



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

East Anglia TWO Offshore Windfarm
(EN010078)

Correspondence received after the
close of the Examination at 23:59 on
Tuesday 06 July 2021

No.	From	Organisation	Date Received
1	Glynis Robertson	Suffolk Energy Action Solutions (SEAS)	8 July 2021
2	Glynis Robertson	SEAS	8 July 2021
3	Glynis Robertson	SEAS	8 July 2021
4	Glynis Robertson	SEAS	8 July 2021
5	Glynis Robertson	SEAS	8 July 2021
6	Jackie Webb	National Grid	17 August 2021
7	Nicola Kirkman		19 August 2021
8	Elizabeth Matterson		21 August 2021
9	Charles Matterson		23 August 2021
10	Louise Burton	Natural England	26 August 2021
11	Amanda Carpenter		28 August 2021
12	Martin Cotter		3 September 2021
13	Tanya Barnard		20 September 2021
14	Olivia and Michael Brown		29 September 2021
15	SEAS	SEAS	4 October 2021
16	Nick Ireland		4 October 2021
17	Rosamond Castle		5 October 2021
18	Ian Cook		5 October 2021
19	Elizabeth Thomas		6 October 2021
20	East Anglia ONE North Limited	East Anglia ONE North Limited	6 October 2021
21	Bernard and Jane Bence		6 October 2021
22	Alan Bullard		6 October 2021
23	Graeme Fraser Steele		6 October 2021
24	Janet Harber		6 October 2021
25	Charles Manning		6 October 2021
26	Alan Thomas		6 October 2021
27	Melissa Baker		7 October 2021
28	Graeme Murray	Anglian Energy Planning Alliance	7 October 2021
29	Andrew Coxson		7 October 2021
30	Professor Peter Dickinson		7 October 2021
31	Lucinda Palmer		7 October 2021
32	Fiona Gilmore	SEAS	7 October 2021
33	Professor Peter Dickinson		8 October 2021
34	Karen Crisp		10 October 2021
35	Nicholas and Nichola Winter		10 October 2021
36	Karen Flower and Mike Flower		11 October 2021
37	Simon Ive	Friston Parochial Church Council	11 October 2021
38	Jan Bullard		11 October 2021
39	Paul Carlaw		12 October 2021
40	Philip Larking		12 October 2021

41	Lesley and John Swann		12 October 2021
42	Christine Laschet		13 October 2021
43	Ian and Mary Shipman		13 October 2021
44	Janet and Michael Dolan		16 October 2021
45	Josie Woodfield		16 October 2021
46	Richard Evans		17 October 2021
47	Ian Henderson		17 October 2021
48	Rosemary Kersey		17 October 2021
49	Lorraine Anderson		18 October 2021
50	Patricia Dorcey and Mr S Dorcey		18 October 2021
51	Michael Mahony	Substation Action Save East Suffolk (SASES)	19 October 2021
52	Elisabeth Jarrett		20 October 2021
53	Margaret Knight		20 October 2021
54	John Lepley		21 October 2021
55	Carole Filby		21 October 2021
56	Sarah Prior		21 October 2021
57	Nicholas and Vivienne Holt		24 October 2021
58	Tim Rowan-Robinson		24 October 2021
59	Martin Allen		25 October 2021
60	Anthony Ball		25 October 2021
61	Judith Gordon		25 October 2021
62	John and Linda Grover		25 October 2021
63	John Lloyd		25 October 2021
64	Louisa Thorp		25 October 2021
65	Carol Filby		26 October 2021
66	Sarah Courage		26 October 2021
67	Andrew Drummond		26 October 2021
68	John Pigneguy		26 October 2021
69	Denise Ryder		26 October 2021
70	Paul and Caroline Spendlove		26 October 2021
71	Josef and Wendy Wondrak		26 October 2021
72	James Piper		27 October 2021
73	Jocelyn Bond		28 October 2021
74	Ning Fulford		29 October 2021
75	Marion Wells		31 October 2021
76	Luigi Beltrandi		1 November 2021
77	Jill Hills		1 December 2021
78	Suffolk Wildlife Trust		1 December 2021
79	Eric Griffiths		2 December 2021
80	Luigi Beltrandi		8 December 2021
81	Amanda Churchill		8 December 2021
82	Janet and Graham Staveley-Dick		8 December 2021
83	Christine Wiles		8 December 2021

84	Ian Wiles		8 December 2021
85	Simon Seymour-Taylor		9 December 2021
86	Sarah Thornton		9 December 2021
87	Nicholas Winter		9 December 2021
88	Snape Parish Council		10 December 2021
89	John Sutherell		10 December 2021
90	Stephen Stocks		13 December 2021
91	Lawrence Mallinson		14 December 2021
92	Lesley and John Swann		15 December 2021
93	Victoria Hambley		16 December 2021
94	Philip Lines		18 December 2021
95	Gillian Beardsworth		28 January 2022
96	Annette Mason-Gordon		4 February 2022
97	Heather Li		7 February 2022
98	Jessica Cassey		8 February 2022
99	Rupert Wace		13 February 2022
100	Fred Beltrandi		14 February 2022
101	Frances Cahill		15 February 2022
102	Sally Averdieck		15 February 2022
103	William Gault		15 February 2022
104	Edward Hunt		15 February 2022
105	Helen and Maria Tejada Randall		15 February 2022
106	Laurelie Walter		15 February 2022
107	Dick Warner		15 February 2022
108	Nicholas Bell		16 February 2022
109	Dee Clayton		16 February 2022
110	Drake Davis		16 February 2022
111	Dawn Oliver		16 February 2022
112	Linda Hawes		16 February 2022
113	Maryanne Nicholls		16 February 2022
114	Jamie Philpot		16 February 2022
115	Jack Wake-Warner		16 February 2022
116	Jane Davis		17 February 2022
117	Melissa Embleton		18 February 2022
118	Charlotte Petsopoulos		18 February 2022
119	India Dickinson		19 February 2022
120	Richard, Celia and Noss Hoyles		19 February 2022
121	Jennifer Morris		19 February 2022
122	Jill Segal		19 February 2022
123	Susan Brinkhurst		20 February 2022
124	Rachel Laughton-Scott		20 February 2022
125	Anthony Morris		20 February 2022
126	Stephen Oliver		20 February 2022
127	Olivia Pomp		20 February 2022
128	Suffolk Energy Action Solutions (SEAS)		21 February 2022
129	Thomas Boyd-Bowman		22 February 2022

130	Timothy Cutler		22 February 2022
131	John Latham		22 February 2022
132	Annabell Matterson		22 February 2022
133	Christopher Matthew		22 February 2022
134	Alex Stanley		22 February 2022
135	Alex Winterbotham		22 February 2022
136	Edward Greenwell		24 February 2022
137	Johnathan Fahie		25 February 2022
138	Clare Malim		25 February 2022
139	Diane Gibbins		27 February 2022
140	Steve Falvey		28 February 2022
141	Christine Gray		28 February 2022
142	Sara Hinton		28 February 2022
143	Bill Hough		28 February 2022
144	Jane Stevensen		1 March 2022
145	Sharon Quilter		2 March 2022
146	Lynne Bellars		4 March 2022
147	Debra Daoutis		4 March 2022
148	Clare Gold		4 March 2022
149	Clare Greenwell		4 March 2022
150	Richard, Sally and Louise Webb		4 March 2022
151	Victoria Heazell		7 March 2022
152	Sophie Marple		7 March 2022
153	Nicholas Matthew		7 March 2022
154	William Matthew		7 March 2022
155	Angus Gribbon		8 March 2022
156	Camilla Haycock		8 March 2022
157	Charlie Mackesy		8 March 2022
158	Rigby Whittaker		8 March 2022
159	Louise Fincham		9 March 2022
160	Lucy Pollard		9 March 2022
161	Giles Webster		9 March 2022
162	Mya Manakides		15 March 2022
163	Frances Hopewell-Smith		15 March 2022
164	Jenny Newhouse		15 March 2022
165	Graham Hanson		16 March 2022
166	Alan Bullard		17 March 2022
167	The Countryside Charity		18 March 2022
168	Ian and Mary Shipman		20 March 2022
169	Cindy Shelley		21 March 2022
170	Katherine Mackie	The Aldeburgh Society	22 March 2022
171	Mark Witham		23 March 2022
172	David McKenna		24 March 2022
173	Sally Sturridge		24 March 2022
174	Dan Millis		25 March 2022
175	Elaine Hawes		28 March 2022
176	Christine and Mike		28 March 2022

	Laschett		
177	Louise and Derek Chadwick		28 March 2022
178	Graham Bagnall		29 March 2022
179	Fiona Gilmore		29 March 2022
180	Fiona Gilmore, Glynis Robertson, Jenny Wells	SEAS	29 March 2022
181	Colette Kearns		30 March 2022
182	Dr Gillian Horrocks		30 March 2022
183	Cllr Marianne Fellowes	Aldeburgh Town Council	30 March 2022

SEAS 8 July 2021

Video submission from SEAS – [Please follow the link to view video 1 MAIN FILM 2019](#) (Audio only)

SEAS 8 July 2021

Video submission from SEAS – [Please follow the link to view video 2 MAIN FILM 2019](#) (Audio only)

SEAS 8 July 2021

Video submission from SEAS – [Please follow the link to view video 3 MAIN FILM 2021](#) (Audio only)

SEAS 8 July 2021

Video submission from SEAS – [Please follow the link to view video 4 MAIN FILM 2021](#) (Audio only)

SEAS 8 July 2021

Video submission from SEAS – [Please follow the link to view video Jason Gathorne-Hardy](#) (Audio only)

From: [REDACTED]
To: [East Anglia Two](#)
Cc: [REDACTED]@scottishpower.com
Subject: FW: EXT || NOTIFICATION: Cadent and National Grid Plant Enquiry Response - Your Ref: East Anglia Two Project – EN010078 (KS) Our Ref: EA_GE4B_3NWP_029949
Date: 17 August 2021 12:10:30
Attachments: [image001.png](#)
[OHL No Objection Development Project 2 17-08-2021 10-40-36 EA_GE4B_3NWP_029949.pdf](#)

Good morning,

Please find attached a No Objection letter.

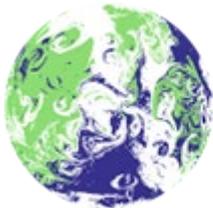
Kind Regards
Jackie Webb

Technical Assistant
Gas Operations
Nationalgrid

[REDACTED]
[REDACTED]

[REDACTED]@nationalgrid.com

National Grid House, B2, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA



PRINCIPAL PARTNER
**UN CLIMATE
CHANGE
CONFERENCE
UK 2021**
IN PARTNERSHIP WITH ITALY

From: Webb, Jackie
Sent: 12 August 2021 14:23
To: EastAngliaTwo@planninginspectorate.gov.uk
Cc: [REDACTED]@scottishpower.com
Subject: FW: EXT || NOTIFICATION: Cadent and National Grid Plant Enquiry Response - Your Ref: East Anglia Two Project – EN010078 (KS) Our Ref: EA_GE4B_3NWP_029949

Hi,

We are issuing a Holding Objection until we receive the information requested below.

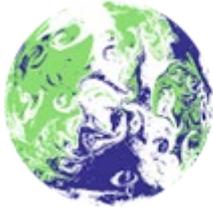
Kind Regards
Jackie Webb

Technical Assistant
Gas Operations
Nationalgrid



[\[redacted\]@nationalgrid.com](mailto:[redacted]@nationalgrid.com)

National Grid House, B2, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA



PRINCIPAL PARTNER
**UN CLIMATE
CHANGE
CONFERENCE
UK 2021**
IN PARTNERSHIP WITH ITALY

From: Webb, Jackie

Sent: 04 August 2021 10:51

To: EastAngliaTwo@planninginspectorate.gov.uk

Subject: FW: EXT || NOTIFICATION: Cadent and National Grid Plant Enquiry Response - Your Ref: East Anglia Two Project – EN010078 (KS) Our Ref: EA_GE4B_3NWP_029949

Good afternoon,

Our engineer has reviewed this application and has asked me to forward this document and has requested turbine locations in x & y co-ordinates OSGB36 metres to plot locations. He also requires turbine height and blade diameter.

Kind Regards
Jackie Webb

Technical Assistant
Gas Operations
National**grid**



[\[redacted\]@nationalgrid.com](mailto:[redacted]@nationalgrid.com)

National Grid House, B2, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA



PRINCIPAL PARTNER
**UN CLIMATE
CHANGE
CONFERENCE
UK 2021**
IN PARTNERSHIP WITH ITALY

From: Webb, Jackie

Sent: 02 August 2021 12:02

To: EastAngliaTwo@planninginspectorate.gov.uk

Subject: FW: EXT || NOTIFICATION: Cadent and National Grid Plant Enquiry Response - Your Ref: East Anglia Two Project – EN010078 (KS) Our Ref: EA_GE4B_3NWP_029949

Good afternoon,

Please send your location plan for us to review this application.

Kind Regards
Jackie Webb

Technical Assistant
Gas Operations
Nationalgrid



[\[redacted\]@nationalgrid.com](mailto: [redacted]@nationalgrid.com)

National Grid House, B2, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA



From: Cadent EAGLES System <noreply.eagles@dnvgl.com>

Sent: 22 June 2021 12:01

To: .box.assetprotection <assetprotection@nationalgrid.com>

Subject: EXT || NOTIFICATION: Cadent and National Grid Plant Enquiry Response - Your Ref: East Anglia Two Project – EN010078 (KS) Our Ref: EA_GE4B_3NWP_029949

NOTIFICATION: Formal Planning Application - Ref: EA_GE4B_3NWP_029949; Your Ref: East Anglia Two Project – EN010078 (KS)

This is a notification about an enquiry received by the Plant Protection team on 16/06/2021.

Reason for Notification:

This Notification has been triggered by proposed imminent activities which may require Asset Protection Consultation. See below for details.

Details:

Formal Planning Application Requiring Asset Protection Consultation (Overhead Line Affected)

This e-mail and any attachments thereto may contain confidential information and/or information protected by intellectual property rights for the exclusive attention of the intended addressees named above. If you have received this transmission in error, please immediately notify the sender by return e-mail and delete this message and its attachments. Unauthorized use, copying or further full or partial distribution of this e-mail or its contents is prohibited.

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

You may report the matter by contacting us via our [UK Contacts Page](#) or our [US Contacts Page](#) (accessed by clicking on the appropriate link)

Please ensure you have adequate virus protection before you open or detach any documents from this transmission. National Grid plc and its affiliates do not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

The Planning, Inspectorate

The Planning Inspectorate
Temple Quay House, Temple Quay, Bristol, BS1 6PN

Jackie Webb
Asset Protection Assistant
Compliance & Integrity
Gas Transmission
National Grid
Warwick
Direct Tel [REDACTED]
Email [REDACTED]@nationalgrid.com

Planning Work?

Contact us on [REDACTED]*

Mon-Fri 8am-4pm

(*Calls may be recorded and monitored)

E-mail: Plantprotection@cadentgas.com

Electricity Emergency Number:

[REDACTED]

National Gas Emergency Number:

[REDACTED]*

*Available 24 hours, 7 days/week.

Calls may be recorded and monitored.

www.nationalgrid.com

Date : 8/17/2021

Our Reference: EA_GE4B_3NWP_029949

Your Reference: East Anglia Two Project – EN010078 (KS)

Dear The Planning, Inspectorate/The Planning Inspectorate

Ref: IP16 4PY Aldeburgh Road, Aldringham cum Thorpe, Aldringham, East Suffolk, Suffolk

National Grid has no objections to the above proposal which is in close proximity to a High Voltage Transmission Overhead Line –Low Pressure Gas Mains, Medium Pressure Gas Mains, Above Ground Gas Installation, Overhead Electricity Line, Electricity Tower.

I have enclosed a location map to show the location of National Grid's Overhead Lines within the vicinity of your proposal and associated information below.

We have no reason to object to the development as it stands.

Yours sincerely

Jackie Webb

Asset Protection Assistant

EAGLES (Electricity And Gas Location Enquiry System)

Is now available to use simply click on the link to register www.beforeyoudig.nationalgrid.com, submit details of your proposed works and receive instant guidance and if appropriate maps showing the location of National Grid gas and electric apparatus.

PLEASE READ CAREFULLY

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.
- National Grid requires 3D drawings to be provided at the earliest opportunity (DWG, DGN or DXF)
- Statutory electrical safety clearances must be maintained at all times. National Grid recommends that no permanent structures are built directly beneath our overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004) To view EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004).
http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/appendixIII/appIII-part2
- The statutory minimum safety clearance is 7.6 metres to ground and 8.1 metres to a normal road surface. Further detailed information can be obtained from the Energy Networks Association's (www.energynetworks.org.uk) Technical Specification E-43-8 for “Overhead Line Clearances”, Issue 3 (2004)
- Any changes in ground levels which are proposed either beneath or in close proximity to our existing overhead lines would serve to reduce safety clearances. Safety clearances to existing overhead lines must be maintained in all circumstances.
- To view the Development Near Overhead Lines Document.
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=23713>
- To view the National Grid Policy's for our Sense of Place Document.
<http://www2.nationalgrid.com/UK/Services/Land-and-Development/A-sense-of-place/>
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines.”
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors at the point where the conductors are under their maximum ‘sag’ or ‘swing’ conditions. Overhead Line profile drawings should be obtained using the above contact details.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of our towers. These foundations extend beyond the base are of the tower. Pillar of Support drawings should be obtained using the contact details above.
- Due to the scale, bulk and cost of the transmission equipment required to operate at 275kV or 400kV we only support proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by government.
- To promote the successful development of sites crossed by existing overhead lines, and the creation of well-designed places, National Grid has produced ‘A Sense of Place’ guidelines, which look at how to create high quality development near overhead lines and offer practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.
- Further information regarding our undergrounding policy and development near transmission overhead lines is available on our website at: <http://www.nationalgrid.com/uk/LandandDevelopment>

From: [REDACTED]
To: [Secretary Of State \(Kwasi Kwarteng\)](#)
Cc: minister.state@beis.gov.uk; [REDACTED]
Subject: PDM - Offshore Wind Energy Plans - Andrew Fay - TO
Date: 19 August 2021 12:42:37

Dear Recipients of this e Mail,

Please consider the serious and detrimental impact of the proposed development of off shore wind energy plans for the Suffolk coast. There are better solutions which will impact this beautiful and precious environment less significantly.

I hope you will make the decision to make the right choice and protect this special area for generations of the future as well as the of the present and also the environment, flora and fauna.

Thank you for taking the time to read this email. I await your reply with interest.

Yours sincerely

Nicola Kirkman

Sent from my iPhone

From: Buffy Matterson [REDACTED]
Sent: 21 August 2021 17:48
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: The Rt Hon Anne-Marie Trevelyan MP <minister.state@beis.gov.uk>; "Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP" [REDACTED] The Rt Hon Robert Jenrick MP [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; OFGEM <offshore.coordination@ofgem.gov.uk>; National Grid ESO <box.offshorecoord@nationalgridESO.com>; NSIP Reform <InfrastructurePlanning@communities.gov.uk>; Suffolk County Councillor, Richard Rout [REDACTED] East Suffolk District Councillor, Craig Rivett [REDACTED]; District Councillor, Russ Rainger [REDACTED] District Councillor Tom Daly [REDACTED]; County Councillor, Andrew Reid [REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close. Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused

to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully, Elizabeth Matterson

From: Charles Matterson [REDACTED]
Sent: 23 August 2021 10:28
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk; [REDACTED]
[REDACTED] Offshore Coordination
<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;
[REDACTED]
[REDACTED]
Subject: EA1N and EA2 Applications

Dear Secretary of State,

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy. The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners. In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

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This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours Faithfully

Charles Matterson

From: [REDACTED]
To: [REDACTED]; [East Anglia One](#); [East Anglia Two](#)
Cc: [REDACTED]
Subject: EN010077 and EN010078 Further information to support the Secretary of State's Ornithology HRA
Date: 26 August 2021 16:37:06
Attachments: [EN010077 EA1N Further NE advice to inform Secretary of States Ornithology HRA.pdf](#)
[EN010078 EA2 Further NE advice to inform Secretary of States Ornithology HRA.pdf](#)

Dear Emré

Please find attached letters containing further advice from Natural England in regards to updating the Collision Risk Modelling (CRM) to inform the Secretary of State's HRA for both EA1N and EA2. This advice is based on the latest evidence which has become available subsequent to the end of examination.

Our advice is consistent with that provided to Secretary of State for the Norfolk Boreas project submitted on 20th August 2021 and for these two projects sent on 26th August 2021

Best Wishes

Lou

Louise Burton

Marine Senior Adviser
East Midlands Area Team
Natural England
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Date: 26 August 2021
Our ref: 10571 and 10572
Your ref: EN010077 and EN010078



National Infrastructure Planning
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T [REDACTED]

BY EMAIL ONLY

Dear Emré

East Anglia One North (EA1N) and East Anglia Two (EA2): Further information to inform the Secretary of States Habitats Regulations Assessments (HRAs)

Please be advised that subsequent to the close of examination the BTO Research Report No.739 "*Additional analysis to inform SNCB recommendations regarding collision risk modelling*" (2021) has been published. Natural England commissioned BTO to review recent evidence regarding the seabird avoidance rates used in Collision Risk Modelling (CRM), and to recommend any updates to the rates advised by Statutory Nature Conservation Bodies (SNCBs).

Natural England and the other SNCBs are now working to produce a joint advice note on CRM, including avoidance rates. It is likely that the rates recommended in the 2021 BTO review will be adopted in that formal SNCB advice note. In advance of that note, we are advising all relevant offshore windfarm projects that the avoidance rates in Table A2 of the BTO report should be used to inform or update impact assessments. This will ultimately ensure that there is a consistent approach across projects to the in-combination Habitats Regulations Assessment, and that robust conclusions can be drawn to inform any compensatory requirements.

We therefore draw your attention to Natural England's advice provided to the Secretary of State for the Norfolk Boreas Project on 20th August 2021^{1,2}, where we have advised that the Collision Risk Modelling for those species where in-principle compensatory measures have been sought should be updated for that project. We therefore advise that EA1N, EA2 and NVG will need to do similar.

Within Annex I to this letter we have provided further details on the report.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely

¹ [Annex 2 Flamborough and Filey Coast SPA](#)

² [Annex 3 Alde-Ore Estuary SPA](#)

Louise Burton
Marine Senior Adviser
E-mail: [REDACTED]@naturalengland.org.uk
Telephone: [REDACTED]

Annex 1 - Additional analysis to inform SNCB recommendations regarding collision risk modelling - BTO Research Report No.739 (2021)

Natural England recently commissioned BTO to undertake an analysis that combines avoidance rates from various sites as presented in Cook et al. (2014), with those derived from the ORJIP study (Bowgen & Cook 2018) and any additional sites where the appropriate data are available, in order to provide avoidance rates based on data across a range of sites where possible.

The Offshore Renewables Joint Industry Programme (ORJIP) funded Bird Collision Avoidance (BCA) project represents one of the few studies of bird behaviour at an offshore windfarm, and a previous analysis, reported in Bowgen & Cook (2018), considered how the data collected could be used to parameterise avoidance rates for Collision Risk Models (CRMs). However, these rates were based on the outputs from a single study, and lacked the contemporary density data required in order to give more context to the observed collision rates. To support the development of SNCB advice in relation to CRMs, there was a need to consider how the data collected as part of the ORJIP BCA project should be combined with existing estimates of avoidance rates, hence the commission to BTO.

The BTO report has now been finalised and is available at: <https://www.bto.org/our-science/publications/research-reports/additional-analysis-inform-sncb-recommendations-regarding>

From: Amanda Carpenter [REDACTED]
Sent: 28 August 2021 08:34
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk; [REDACTED]
[REDACTED]; Offshore Coordination
<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;
[REDACTED]
[REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

I am writing in respect of the

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

As we run up to COP26 the challenge of meeting our net zero goals becomes even greater and leadership from the Government at this time is crucial. Renewables, and wind in particular, have a significant part to play and the role of offshore wind here in East Anglia is key to the UK's 40GW wind power goals set for 2030.

However, the government has clearly stated, on page 80 of the **Energy White Paper 'Powering Our Net Zero Future'**, "*to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid*".

I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners. In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully

Amanda Carpenter

Resident in Snape Suffolk

Amanda Carpenter CEO

[Achill Management](#)



Presenter [Planet Pod](#) - *essential listening for everyone who cares about the planet*

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED] [East Anglia ONE](#)
Subject: [North; East Anglia Two](#)
[Little Moor Farm Track](#)
Date: 03 September 2021 17:44:43

Mr M Cotter

[REDACTED]

Hello Joanna

I trust you are well.

Whilst it is very pleasing to get relief from the purgatory I have been enduring since April, I am very disappointed in the state you have left my track. I have wrote to you on a number of occasions about mainly track blockages but have said the track requires remedial work especially at the Grove Road end in previous dialogue. This week I saw a digger with a blade and roller and presumed you where going to rectify the damage, only to see all machinery disappear on the back of a low loader. Oh well nothing changes, SPR's word is still like pie crust "easily broken". I have told you in the past that this track is private, it is not a vehicular right of way and it is mine and my partners only access. I know the landowner gave you access at this point and I couldn't stop you. I will remind you again I have to finance along with the landowner the repair to the track and before the current landowner took possession of the track I had carried out significant remedial repair at my cost. It is to be hoped that you will make good the damage that the track has sustained, I suggest it needs blading, hardcore and rolling to return it to its pre SPR arrival condition.

Kind regards

Martin Cotter.

Sent from my iPad

From: Tanya Barnard [REDACTED]
Sent: 20 September 2021 19:56
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk; [REDACTED]
[REDACTED]; Offshore Coordination
<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;
[REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications Split Decision

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

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This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully

Tanya Barnard

Sent from my iPhone

From: [REDACTED]
Sent: 29 September 2021 16:36
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Cc: [REDACTED]
Subject: Mass Energy Industrialisation planned for Suffolk Coast and Heaths

Sir, the Planning Inspectorate are due to present their recommendations to you following the public consultation hearings into the proposed site for a new electricity sub station at Friston in Suffolk to support the wind farms East Anglia North 1 (EA1N) and East Anglia Two (EA2). If the Friston site is agreed, there will automatically be at least six other applications or more piggybacking onto this application, each justifying that they have to be near the substation. If consented, this so called 'Energy Hub' would be the largest energy infrastructure in the UK in a totally inappropriate location.

As the responsible Secretary of State, I would respectfully ask that you rigorously examine the following:

Can they provide evidence that brownfield or industrialised sites have been extensively researched and considered to provide investment and job opportunities in areas of East Anglia that need it.

The answer is no.

They have chosen instead to use prime agricultural land adjacent to a quintessential Suffolk village in a tourist area of outstanding natural beauty. The other projects in the pipeline would cluster around the sub station; each of them on a piecemeal planning application. Reject Friston as totally unsuitable and they would all have to look elsewhere. Rejecting the Friston application decision is therefore vitally important.

It is my understanding that there is widespread support for the offshore windfarms themselves and that a 'split decision' has been recommended and championed by our MP Therese Coffey so that the offshore turbines 'do' receive consent to go forward so as not to waste valuable time whilst the 'on shore' infrastructure proposals are rejected so that better locations can be found.

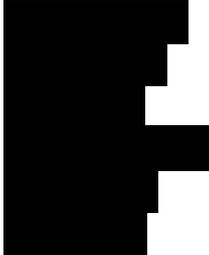
At the public presentation today (29th Sep 21) in Friston on National Grids Nautilus Interconnector project it is clear that their only concern is to be sited near to the proposed Friston Sub Station. Indeed all their literature says that they are proceeding with their application on the

'reasonable assumption' that Friston will be agreed by you.

Please reject Friston and support the 'split decision' proposal.

Thank you

Mrs Olivia Brown and Mr Michael Brown



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From: info at SEAS <[REDACTED]>
Sent: 04 October 2021 22:52
To: East Anglia Two <EastAngliaTwo@planninginspectorate.gov.uk>; [REDACTED]
Cc: Fiona Gilmore <[REDACTED]> East Anglia ONE North
<EastAngliaOneNorth@planninginspectorate.gov.uk>
Subject: SEAS Submission for The Secretary of State re EA1N and EA2 DCO application

Dear Emre and Caroline,

Further to your email below, please find attached new documentation and further evidence since the closing of EA1N and EA2 examinations that SEAS would like included (along with the USB stick) in the package to be sent to the Secretary of State once the Examining Authority's report and recommendation has been submitted.

1. [Crossed Wires: Maintaining public support for offshore wind farms](#), Policy Exchange, July 2021 (attached)
2. [SEAS Analysis of Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report](#), SEAS, July 2021 (attached)
3. [Nautilus Interconnector Consultation Documents](#), National Grid Ventures, September 2021
 - [Nautilus Interconnector Briefing Pack, NGV, September 2021](#)
 - [Nautilus Interconnector FAQs, NGV, September 2021](#)
 - [Nautilus Interconnector Information Sheets, NGV, September 2021](#)
 - [Nautilus Interconnector Maps, NGV, September 2021](#)
 - [Nautilus Interconnector, Webinar Instructions, 7 October 2021](#)
 - [Nautilus Interconnector, Webinar Instructions, 12 October 2021](#)
4. Further evidence of Cumulative Impact, SEAS, October 2021 (attached)
5. [Response to Ofgem consultation on changes intended to bring about greater coordination in the development of offshore energy networks, SEAS & SASES, 7 September 2021](#) (attached SEASSASES_OFGEM_OTNR_0921.pdf)
6. <https://www.nationalgrideso.com/document/211251/download> ESO open letter on the OTNR, 27 September 2021. EAN1 and EA2 fit into the 'Early Opportunities Workstream' criteria. (attached ESO Open Letter on the OTNR 27 September 2021.)

Thank you for your assistance in this matter.

Regards

The SEAS Team

info@suffolkenergyactionsolutions.co.uk
www.suffolkenergyactionsolutions.co.uk

Crossed Wires



Maintaining public support for offshore wind farms

Ed Birkett

Foreword by Rt Hon Dame Andrea Leadsom DBE MP and
Rt Hon Amber Rudd



Cover Image: The cable ship Stemat Spirit begins to lay the electricity cable from Thornton Cove to the Wainey offshore wind farm

Crossed Wires

Maintaining public support for offshore wind farms

Ed Birkett

Foreword by Rt Hon Dame Andrea Leadsom DBE MP and
Rt Hon Amber Rudd



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About the Author

Ed Birkett is a Senior Research Fellow in the Energy and Environment Unit. Ed joined Policy Exchange in 2020 after spending a year at Harvard as a Kennedy Scholar. For the last five years, he has worked in the UK energy sector, most recently as a developer of large-scale solar and energy storage projects. He has an MEng in Engineering Science from the University of Oxford.

Acknowledgements

The author would like to thank the many companies and stakeholders who provided input and views to this report. The author would also like to thank Josh Buckland and Sam Hall for providing comments on a draft of this report.

This report was produced by Policy Exchange and the views and recommendations in the report are those of Policy Exchange.

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About the Policy Exchange Energy & Environment Unit

Policy Exchange's award-winning Energy & Environment unit examines the issues and challenges in achieving a sustainable economy whilst promoting prosperity and democratic values. The unit's recent work has included:

- *Beyond COP26: The UK's Green USPs* (June 2021), which argues that the UK must harness its 'Green Unique Selling Points' to boost jobs at home and environmental progress around the world.
- *The Geopolitics of Climate Change* (April 2021), the first edition of Policy Exchange's new quarterly journal, *Environmental Affairs*.
- *Capital Shift* (March 2021), which argues that the UK should use its presidencies of COP26 and the G7 to green the financial system.
- *Charging Up* (February 2021), which sets out a new approach to ensure a comprehensive and high-quality national network of public chargepoints for electric vehicles.
- *Powering Net Zero* (December 2020), which proposes local electricity pricing as the key to delivering a Net Zero energy system.
- *The Future of the North Sea* (November 2020), which proposes a comprehensive strategy to maximise the contribution of the North Sea to Net Zero and Levelling Up.
- *The Future of UK-EU Energy Cooperation* (September 2020), which proposes policies to strengthen future UK-EU energy and climate cooperation in the Future Relationship.
- *Route '35* (July 2020), which argues for a California-style 'ZEV mandate' to deliver the phase-out of petrol and diesel cars.
- *Outbreaks and Spillovers* (May 2020), exploring the origins of zoonotic diseases such as COVID-19 in ecological disruption.
- *Bigger, Better Forests* (November 2019), on policies needed to increase tree planting in the UK.
- *Modernising the UK* (August 2019), which proposes a series of measures to update UK infrastructure and institutions.
- *Fuelling the Future* (September 2018), examining the options for a hydrogen-based economy.
- *The Future of Carbon Pricing* (July 2018), setting out the need for an economy-wide carbon price and border carbon adjustments.
- *Small Modular Reactors* (January 2018), exploring the potential role of SMRs in the UK energy mix.

- *Farming Tomorrow* (August 2017), calling for a new post-Brexit agricultural policy that places environmental services and productivity at the heart of British farming.

The Unit includes five specialists, actively supported by Policy Exchange's team of in-house economists and policy specialists, as well as a network of experts in industry, government, academia and beyond.

Josh Buckland, Senior Fellow, Energy & Environment

Josh is a Senior Fellow with Policy Exchange's Energy & Environment unit. Josh was previously Energy Advisor to the Secretary of State for Business, Energy and Industrial Strategy. In this role he provided expert policy and strategic advice to both Greg Clark and subsequently Andrea Leadsom on all major energy and climate issues. Josh spent two months working as a senior advisor within the COP26 Unit. Previously he held a number of other senior roles at the centre of Government, including spending three years in the Prime Minister's Policy Unit in No10 Downing Street working on energy and environment issues. He was also Head of the Energy Policy team in HM Treasury.

Dr Ben Caldecott, Senior Fellow, Energy & Environment

Ben is a Senior Fellow with Policy Exchange's Energy & Environment unit. Ben is the founding Director of the Oxford Sustainable Finance Programme at the University of Oxford Smith School of Enterprise and the Environment. At the University of Oxford, he is the inaugural Lombard Odier Associate Professor and Senior Research Fellow of Sustainable Finance, the first ever endowed professorship of sustainable finance, and a Supernumerary Fellow at Oriol College. Ben is also the founding Director and Principal Investigator of the UK Centre for Greening Finance & Investment (CGFI), established by UK Research and Innovation in 2021 as the national centre to accelerate the adoption and use of climate and environmental data and analytics by financial institutions internationally. Ben specialises in environment, energy, and sustainability issues and works at the intersection between finance, public policy, and academe, having held senior roles in each domain. Among his previous roles, he was Research Director for Energy and Environment at Policy Exchange between 2008 and 2009).

Benedict McAleenan, Senior Adviser

Benedict McAleenan leads Policy Exchange's Energy & Environment Unit. Benedict is the Founder and Managing Partner of the strategy consultancy Helmsley Partners. He is a public policy adviser with 14 years' experience in policy development, political risk and thought leadership in the Energy, FMCG, Property, Manufacturing and Engineering sectors. Benedict has advised clients including National Grid, Centrica Energy, the Renewable Energy Association, Madison Square Garden Company, OVO Energy, Shell, Sainsbury's and Balfour Beatty.

Ed Birkett, Senior Research Fellow

Ed Birkett is a Senior Research Fellow in the Energy and Environment Unit. Ed joined Policy Exchange in 2020 after spending a year at Harvard as a Kennedy Scholar. For the last five years, he has worked in the UK energy sector, most recently as a developer of large-scale solar and energy storage projects. He has an MEng in Engineering Science from the University of Oxford.

William Nicolle, Research Fellow

William Nicolle is a Research Fellow in the Energy and Environment Unit. Will joined Policy Exchange in 2019, having previously worked as a Graduate Analyst for Centrica, and most recently as a Researcher at another London-based think tank focusing on energy and environmental policy, co-authoring two reports. He has a BA in Geography from the University of Oxford.

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Foreword

By Rt Hon Dame Andrea Leadsom DBE MP and Rt Hon Amber Rudd

Over the last decade, the UK has rapidly invested in green infrastructure. During this time, we have seen the importance of maintaining democratic consent for development. Without this, strong local opposition risked delaying or even blocking nationally-significant projects.

Onshore wind farms saw incredible take up, but the significant local impact meant that they were rarely welcomed by the communities that hosted them. Similarly, shale gas extraction (fracking) could have improved UK energy security as we rapidly transitioned away from coal. However, whilst it was the evidence of potential seismic impacts of fracking that drove Andrea's decision to impose a moratorium, we must also recognise that some communities were vehemently against this new technology.

To date, offshore wind has avoided many of these concerns. Offshore wind farms are far from shore, where huge turbines can capture the strongest winds and produce more electricity. In addition, the cost of offshore wind farms has fallen so much that they are now cost-competitive with those onshore. So, our decision in 2015 to refocus subsidies towards offshore wind seems to have paid off.

Offshore wind does, however, generate its own problems. That we can fix giant turbines to the seabed or even float them offshore is a marvel of engineering, but they still require significant new infrastructure on land, including underground cables, new substations in some cases the size of Wembley Stadium, new electricity cables snaking under beaches, and new pylons to transmit clean electricity to customers in cities and industrial areas.

Local communities are rightly concerned about the sheer amount of infrastructure built by individual offshore wind companies and the Government must act. The Government should urgently carry out an audit of all outstanding plans for onshore infrastructure relating to offshore wind farms and consider ways to minimise the damage to precious inland areas. It is only by listening to communities and taking account of the need to protect our environment that we can maintain the huge level of support for the UK's decarbonisation efforts.

We support the concept of an offshore wind 'ring main' where neighbouring offshore wind farms will coordinate their infrastructure and coordinate timelines to reduce the burden of infrastructure on communities.

Where new onshore infrastructure is needed, we should compensate local communities through new 'Offshore Wind Wealth Funds'. We already do this for onshore wind farms through 'Community Benefit Funds', and

we were planning something similar for fracking. It's absolutely right that coastal and rural communities should be compensated for hosting new large-scale infrastructure that provides national benefits but has local negative impacts.

More coordination will not come about just by leaving it to the market. It requires Ministers to outline a clear vision for the future of the UK's onshore and offshore electricity network. The Offshore Transmission Network Review is a welcome first step, but Ministers also need to provide more direction to the regulator Ofgem. In addition, the time has surely come to establish a fully Independent System Operator for Great Britain.

Offshore wind provides fantastic opportunities for thousands of green jobs, from apprenticeships in manufacturing wind turbines and electricity cables to roles in construction and operations and scientific developments in technologies needed to build not just our capability at home but exports around the world.

UK companies are already winning contracts to support the development of offshore wind farms across the world but there is more that we can do to share UK expertise and accelerate the deployment of offshore wind farms to support the global transition to Net Zero.

Rt Hon Dame Andrea Leadsom DBE MP is the Member of Parliament for South Northamptonshire. Between 2019 and 2020, she served as Secretary of State for Business, Energy and Industrial Strategy.

Rt Hon Amber Rudd was the Member of Parliament for Hastings and Rye from 2010 to 2019. Between 2015 and 2016, she served as Secretary of State for Energy and Climate Change.

Andrea and Amber are Co-Charing Policy Exchange's Beyond COP26 programme.

Glossary of Terms

Term	Definition
Balancing Mechanism (BM)	Market that the ESO uses to balance supply and demand for electricity in real-time. The ESO uses the BM to resolve network constraints.
BEIS	Department for Business, Energy & Industrial Strategy. UK Government department responsible for business, energy and industrial strategy.
Climate Change Committee (CCC)	Independent statutory body advising the UK and devolved governments on emissions targets and preparing progress reports to Parliament.
Carbon dioxide (CO ₂)	Carbon dioxide (CO ₂) is the main greenhouse gas. The vast majority of man-made CO ₂ emissions come from the burning of fossil fuels.
Constraint costs	Constraints on the electricity network occur when a power line cannot transmit any more electricity. When this happens, the network is said to be 'constrained'. To resolve constraints, the ESO pays generators to turn down. These costs are called 'constraint costs'.
Contracts for Difference (CfD)	Main support scheme for renewable energy generators in Great Britain. Generators receive a fixed price for their electricity, with payments based on the difference between the wholesale price and a fixed 'Strike Price'.
DEFRA	Department for Environment, Food & Rural Affairs. UK Government department.
Electricity System Operator (ESO)	The GB Electricity System Operator, a company within the National Grid group, is responsible for balancing the electricity system's supply and demand to ensure a stable, high-quality supply of electricity. The ESO is also responsible for many aspects of network planning and procures a range of 'system balancing services' on behalf of energy users.
Electricity Market Reform (EMR)	A significant recent programme of electricity market reform in Great Britain. Implemented through the Energy Act 2013.

Emissions Trading Scheme (ETS)	A scheme that sets a cap on the maximum level of emissions from particular industries in a region. Emitters must purchase 'ETS permits' and the number of these available declines over time, in order to reduce overall emissions in that region. Companies can trade emissions permits. The EU operates an ETS.
GB electricity market	The electricity market covering Great Britain (England, Scotland and Wales).
Gigawatt (GW)	One gigawatt (1 GW) equals 1,000 megawatts (1,000 MW)
Green hydrogen	The production of hydrogen using renewable electricity sources. In the UK, the term 'green hydrogen' is typically used to describe all hydrogen produced with electricity.
Hydrogen	A clear, odourless gas which is highly flammable, the most common element in the universe which can be used as a low emission alternative fuel for power, heating and transport.
Local pricing	A wholesale electricity market split into a large number of nodes. For example, the California electricity market has approximately 10,000 pricing nodes.
Net Zero	A target of zero overall greenhouse gas emissions across an economy or for a company. For example, the UK Government has committed to Net Zero emissions across the UK by 2050. The "Net" in Net Zero refers to a balance between positive emissions (e.g. from burning fossil fuels) and negative emissions (e.g. from planting trees or capturing carbon dioxide from the air).
Megawatt (MW)	Measure of installed capacity. The maximum instantaneous output of a generator.
Megawatt hour (MWh)	Measure of energy. For example, a generator that generates 1 MW of electricity for one hour generates 1 MWh of energy.
National pricing	A wholesale electricity market with the same price in all locations in each time period (i.e. a single bidding zone). For example, Great Britain uses national pricing.
Nodal pricing	See <i>Local pricing</i> .
Ofgem	The Office for Gas and Electricity Markets (Ofgem) is the regulator for gas and electricity in Great Britain.
Regional pricing	A wholesale electricity market split into a number of zones that cover a geographical region of that market. For example, the Italian electricity market has 6 zones.

Retail electricity market	electricity supplied to customers, including domestic customers and small businesses. Retail electricity is more expensive than wholesale electricity because it includes network charges and the cost of subsidies and fuel poverty obligations.
System balancing services	The ESO procures system balancing services to manage the technical parameters of the electricity network to prevent blackouts. These services include frequency regulation, voltage control, inertia, and constraint management.
Transmission Owners (TO)	The privately-owned regional monopolies that own the electricity transmission networks in Great Britain. The TOs are National Grid Electricity Transmission (England and Wales), Scottish Power (South Scotland), and SSE Networks Transmission (North Scotland).
Uniform pricing	See <i>National pricing</i> .
Wholesale electricity market	Main market for generators and suppliers to buy and sell electricity. Only take into account energy costs, not network charges and the cost of subsidies (see <i>retail electricity market</i>).
Zonal pricing	See <i>Regional pricing</i> .

Executive Summary

The UK's offshore wind programme is an international success story that demonstrates how governments can work with the private sector to deliver emissions reductions and grow green jobs. However, the sheer number of new wind farms now planned in the UK means that there is increasing local concern over the new 'grid connections' required to connect offshore wind farms to the onshore electricity network. In particular, there is concern that the current regime, which sees each offshore wind farm build its own new power lines and substations to connect to the existing electricity network, is not fit for purpose. Without more coordination between projects, the impact of this new infrastructure on local communities and the environment risks similar local backlash to onshore wind farms and fracking. If these local concerns are not addressed then the current political consensus on the need for offshore wind farms risks breaking down, putting at risk the Government's commitment to deliver its ambitious Carbon Budgets and target for Net Zero emissions by 2050.

New grid connections for offshore wind farms are becoming highly controversial.

As the cost of UK offshore wind farms has tumbled, falling by two-thirds since 2015,¹ the Government's targets for deploying the technology have increased. In early-2019, the Government and industry agreed to target 30 gigawatts (GW) of offshore wind by 2030.² Later that year, in the December 2019 General Election, the Conservative Party manifesto upped this target to 40 GW by 2030.³ The 40 GW offshore wind target by 2030 was also a key part of the Prime Minister's 10 Point Plan, published in autumn 2020.⁴

This increased ambition has been accompanied by a significant rise in the number of new offshore wind farms under development off the UK coastline. Under current rules, each offshore wind farm has built its own 'grid connection' to the existing onshore network, without considering the opportunity to coordinate with the connections of nearby projects.⁵ As a result, new underground cables are now planned that would criss-cross coastal and rural communities, accompanied by large onshore electricity substations serving different projects that would link the new cables to the existing network.

This planned new infrastructure is already causing significant concern in East Anglia and could lead to similar concerns in North Wales, Humberside and the east coast of Scotland as more offshore wind farms

1. KPMG (September 2019). *Blow away: CfD round 3 delivers record low prices for offshore wind*. [Link](#)
2. BE S (March 2019), *Offshore wind Sector Deal – one year on*. [Link](#)
3. Prime Minister's Office (October 2020). *New plans to make UK world leader in green energy*. [Link](#)
4. BE S, 10 Downing Street (November 2020). *The ten point plan for a green industrial revolution*. [Link](#)
5. The current rules do not prohibit coordination between projects. However, to date, each wind farm has built its own 'radial' connection.

are developed. Without reform, there is a risk that new projects will face growing local opposition, including through the courts, that will slow down the UK's offshore wind programme, limiting jobs and slowing down cuts to emissions.

The current rules are also likely to increase energy bills, with analysis from the Electricity System Operator showing that more coordination could save between £3bn and £6bn by 2050, depending on how quickly it can be implemented.⁶

Short-term changes by the Government can kick-start the coordination process.

The current process for planning new electricity networks suffers from a lack of accountability, a lack of long-term planning, and a lack of coordination between projects. In addition, the choice of route for new grid connections for offshore wind farms does not fully account for disruption faced to local communities, impacts on the environment, and does not include compensation for all affected parties.⁷

The Government's *Offshore Transmission Network Review* will tackle some of these weaknesses,⁸ but will only work as part of a wider set of reforms that address the structure and remit of the institutions that manage Great Britain's electricity system – these reforms should remove potential conflicts of interest and ensure clear accountability for the network planning process. We believe that an evolutionary package of reforms, comprised of short-term and long-term actions, can deliver the revolution in outcomes that is needed to deliver a coordinated onshore and offshore electricity network.

In the short term, the BEIS Secretary of State should issue statutory guidance to the regulator, setting out the Government's ambition for an offshore wind 'ring main' and giving Ofgem a clear mandate to adapt the current, technocratic process of network planning. This will be crucial to delivering the Prime Minister's target for 40 GW of offshore wind by 2030.

BEIS should also produce new guidance that would help the Electricity System Operator and Ofgem to assess the negative impacts of different options for connecting offshore wind farms to the onshore network. This assessment process should be conducted at the national level, encouraging the regulator and the electricity network companies to choose coordinated approaches that minimise new infrastructure. Alongside this guidance, Ofgem and the electricity industry should increase the network planning horizon from ten years to thirty years and should review the processes used to assess which new power lines and substations are required.

To compensate local communities that host new infrastructure, the Government should require operators of offshore wind farms to establish 'Offshore Wind Wealth Funds' to fund community projects; Offshore Wind Wealth Funds could be modelled on the Government's prior plans for 'Shale Wealth Funds'.⁹

6. National Grid ESO (December 2020). *Offshore Coordination Phase 1 Final Report*. [Link](#).

7. Project developers are required to provide compensation to those directly affected, for example farmers whose income includes farm subsidies. However, developers are not required to provide compensation for loss of visual amenity or disruption during construction.

8. BEIS (July 2020). *Offshore transmission network review*. [Link](#)

9. HM Treasury (Updated November 2017). *Shale Wealth Fund: response to the consultation*. [Link](#)

In the longer term, more radical change is needed.

In the longer term, the Government should make more substantial reforms, including new legislation, to deliver the offshore wind farms that will be needed to meet the Sixth Carbon Budget by 2035 and Net Zero emissions by 2050.

To increase accountability and to reduce potential conflicts of interest, the Government should establish a new ‘Independent System Operator for Great Britain’ (‘ISO-GB’), fully independent from the National Grid group of companies.¹⁰ The Government should build on Ofgem’s recent review of the current arrangements.¹¹

The Government should also establish a new ‘UK Seas Authority’ to plan the use of the UK’s seas, which will require an increasingly delicate balancing act between different seabed users, including offshore wind farms, fishing, shipping, zones of environmental protection, and more. This new Authority should be accountable to the BEIS Secretary of State and should have new powers to ensure coordination, working with private companies and existing bodies like The Crown Estate, the Oil and Gas Authority, the Marine Management Organisation, and the Devolved Administrations.¹²

Finally, the Government must harness markets to ensure that energy projects like offshore wind farms are built and connected in places where they have the most value. To achieve this, the Government should reform Great Britain’s wholesale electricity market to include ‘local electricity pricing’, which is used in many US States, Singapore and New Zealand.¹³ As Policy Exchange has previously argued, local pricing is the key to a low-cost, smart electricity system, where generators, customers and energy storage providers work together to minimise the amount of new infrastructure that is required.¹⁴

These longer-term changes will require a new Energy Act, which should form part of the Government’s legislative programme for the next Parliamentary Session (expected to cover the period 2022/23).

Changes must not delay existing projects or harm investor confidence.

The challenge for the Government is to deliver these changes without slowing down existing projects or damaging investor confidence in the UK’s offshore wind sector – any delays will put at risk the Government’s manifesto commitment for 40 GW of offshore wind capacity by 2030, and any harm to investor confidence will increase the cost of new offshore wind farms and lead to higher energy bills.

For projects that are close to construction, the Government must ensure that additional coordination is opt-in and that any additional costs are underwritten by the Government, including compensation for delays to projects. Even if these conditions are met, it will be difficult to convince developers to change their plans, which may have been under development for over a decade, as this would incur significant additional costs.

Therefore, for these ‘in-flight’ projects, the Government should

10. Reforms to the existing ESO should continue in parallel with the process to establish the new ‘ISO-GB’.

11. Ofgem (January 2021). *Review of GB energy system operation*. [Link](#)

12. For more details, see Policy Exchange (November 2020). *Future of the North Sea*. [Link](#)

13. Note that local pricing will not fully resolve complex issues around locational signals, including the appropriate regime for transmission network charges. These issues are discussed in more detail later in this report.

14. For more details, see Policy Exchange (December 2020). *Powering Net Zero*. [Link](#)

focus only on the projects where coordination could bring the biggest benefits. The Government should use East Anglia as a pilot region for early coordination, as there are six new offshore wind farms planning to connect to the onshore electricity network in the mid-2020s, with plans for several new underground cables and new substations in the region. The Government will still need to convince the developers in East Anglia, or a subset of them, to opt into the coordination pilot.

Because offshore wind projects and upgrades to the onshore electricity network take many years to develop, any changes will take time to feed through, so stakeholders will need to be patient with the Government. However, without reform, there is now a serious risk that grid connections for offshore wind farms will become a major barrier to the Government's manifesto commitments on offshore wind and Net Zero. With the right changes, there is no reason why the UK cannot develop a coordinated onshore and offshore electricity network that reduces bills, minimises disruption and protects the local environment.

Policy recommendations

This report makes ten specific policy recommendations for the UK Government, grouped into four themes that aim to address the weaknesses of the existing process (Table 1).

Table 1: Policy recommendations to deliver a coordinated onshore and offshore electricity network.

Theme	Time-frame	Recommendation
Establish clear accountability for network planning	Short term	#1: The BEIS Secretary of State should use the 'Strategy and Policy Statement' to issue guidance to Ofgem on the Government's ambitions for a coordinated approach to developing Great Britain's onshore and offshore electricity network, including an offshore wind 'ring main' for new offshore wind farms.
	Long term	#2: The Government should establish a new 'Independent System Operator for Great Britain' ('ISO-GB'), modelled on examples in the United States and beyond. ISO-GB should have overall responsibility for planning the GB transmission network, including the responsibility to develop a coordinated onshore and offshore network.
Minimise disruption and compensate communities	Short term	#3: The Government should continue to develop an 'opt-in' mechanism to coordinate late-stage offshore wind projects, focusing on the East Anglia region. This coordination could include sharing underground cable routes or coordinating construction timelines.
	Short term	#4: Where the impact of new offshore wind farms cannot be reduced, for example because projects have already secured planning permission, the Government should compensate communities impacted by the construction of offshore wind farms and associated infrastructure such as substations and cable routes.
	Short term	#5: BEIS should produce new guidance that would help Ofgem and the ESO to assess the negative impact of different connection options for offshore wind farms. This assessment should be conducted at the national level, with the aim of reducing the burden of new infrastructure on the environment and local communities.
	Long term	#6: The Government should establish mandatory 'Offshore Wind Wealth Funds' for new offshore wind farms, as a condition of receiving support in future Contracts for Difference auctions. Offshore wind farms should pay a minimum community benefit of £0.50 per MWh (approximately £2m per year for a 1 GW offshore wind farm).

Establish a long-term plan to deliver a Net Zero electricity network by 2050.	Short term	#7: The BEIS Secretary of State and Ofgem should jointly request the ESO to produce a long-term plan for Great Britain's electricity network out to 2050, under a range of scenarios, to guide network planning decisions moving forward.
	Short term	#8: Ofgem should review the main network planning methodology ('least-worst regrets') to ensure that it is fit for purpose for a coordinated onshore and offshore electricity network and Net Zero. Ofgem should also work with the ESO to develop new approaches to assess which network projects should have the highest priority.
	Long term	#9: The Government should establish a new 'UK Seas Authority' to coordinate the development of the UK's seas across all users, including offshore wind, fishing, shipping, environmental protection and more.
Encourage developers to build and connect projects in places where they will reduce energy bills the most.	Long term	#10: To ensure that offshore wind farms are built in places where they will reduce energy bills the most, the Government should implement 'local electricity pricing' in Great Britain's wholesale electricity market. This will encourage project developers to build and connect projects closer to customers.

1. Introduction

Since the first UK offshore wind farm was built twenty years ago, installed capacity has grown substantially, doubling in the last five years from 5.1 gigawatts (GW) in 2015 to 10.4 GW in 2020 (Figure 1).

To meet the Government's targets, capacity will need to double again by 2025, to 20 GW, and double again by 2030 to reach 40 GW. One estimate suggests that the UK will need to install one wind turbine every weekday during the 2020s.¹⁵

Meeting these ambitious offshore wind targets is only possible due to rapidly falling prices and new, larger turbines; the newest turbines can each produce 14 megawatts (MW) of electricity and are 250 metres tall.^{16,17} These turbines have double the maximum output of the 7 MW turbines used in recent projects.¹⁸

The UK's offshore wind rollout is a good news story on jobs, climate change and falling costs, but there are several barriers that could delay the next phase of the offshore wind programme. These include: legal challenges to planning consents;¹⁹ interference with military radar systems;²⁰ and conflicts with shipping lanes and fishing grounds.²¹

However, the biggest political risk to the UK's offshore wind programme is now the development of the onshore and offshore electricity networks that will be needed to transmit the electricity generated by offshore wind farms to customers in urban and industrial areas.

This section provides an overview of the current and planned development of offshore wind farms in the UK, including the impacts on Great Britain's electricity network.

Offshore wind targets

In early 2019, the UK Government and the offshore wind industry set a target to build 30 GW of offshore wind capacity by 2030, subject to costs continuing to fall.²² In the deal, the industry has set a target for 60% lifetime UK content in domestic projects by 2030, compared to around 50% today.

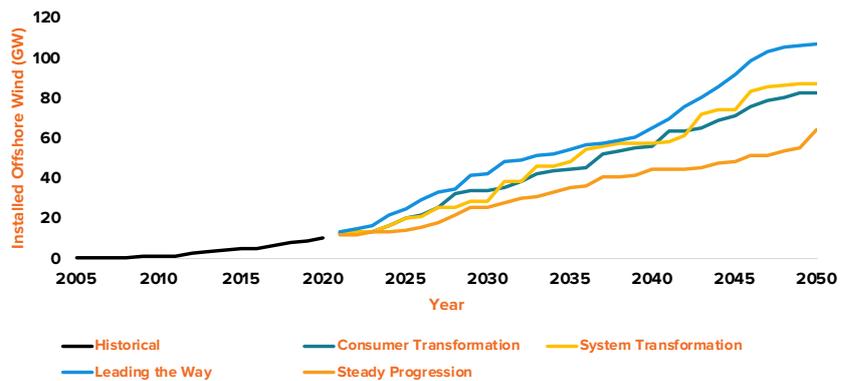
At the December 2019 election, the Conservative Party manifesto included a commitment to increase the offshore wind target to 40 GW by 2030.²³ In October 2020, the Government officially raised the 2030 offshore wind target to 40 GW, including 1 GW of floating offshore wind.²⁴

The Government has also committed to invest £160m in new and upgraded port infrastructure to promote offshore wind manufacturing in the UK. In March 2021, the Government awarded the first £95m of the

15. Aurora Energy Research (February 2020). *Reaching the UK Government's target of 40 GW of offshore wind by 2030 will require almost £50bn in investment.* [Link](#)
16. GE Renewable Energy (undated). *Haliade-X offshore wind turbine.* [Link](#)
17. Siemens Gamesa (June 2020). *Siemens Gamesa's flagship 14 MW turbine to power 1.4 GW Sofia offshore wind power project in the UK.* [Link](#)
18. Orsted (June 2019). *Operations start on Horns Sea One, the world's largest offshore wind farm.* [Link](#)
19. RE News (February 2021). *Judge quashes consent for Norfolk Vanguard.* [Link](#)
20. Ministry of Defence (Defence and Security Accelerator) (Updated June 2021). *Wind-farm Mitigation for UK Air Defence (Phase 2).* [Link](#)
21. The Crown Estate (August 2016). *Changes to fishing practices around the UK as a result of the development of offshore windfarms - Phase 1.* [Link](#). See page 8: *The relationship between fishermen and wind farm developers and their service companies was often described as poor in terms of communication and information exchange.*
22. BE S (March 2019). *Offshore wind Sector Deal - one year on.* [Link](#)
23. Conservative and Unionist Party (2019). *Manifesto 2019.* [Link](#). Page 55.
24. Prime Minister's Office (October 2020). *New plans to make UK world leader in green energy.* [Link](#)

fund, split between ports in the Humber and Teesside.²⁵ As part of this funding, GE Renewable Energy announced plans to build a new blade manufacturing plant on Teesside.²⁶ By 2050, National Grid ESO forecasts that UK offshore wind capacity could rise to between 60 GW and 100 GW, potentially including offshore wind farms directly connected to offshore production facilities for green hydrogen (Figure 1).

Figure 1: UK installed offshore wind capacity – historical and forecast to 2050.



Source: (Historical) BEIS: Renewable Energy Planning Database.²⁷ (Forecasts) National Grid ESO: Future Energy Scenarios.²⁸

The UK’s advanced pipeline of offshore wind projects is approximately 30 GW, including projects that are operational, under construction, or in the planning system; the advanced pipeline includes 5.5 GW of projects awaiting a planning decision, and 5.5 GW of projects that have secured planning permission but are yet to secure a ‘Contracts for Difference’ support contract from the Government (Figure 2).

The earlier-stage pipeline includes several extensions to existing wind farms, including extensions to the Greater Gabbard, Galloper, Sheringham Shoal and Dudgeon offshore wind farms off East Anglia, the Rampion extension off Brighton, and the Gwynt y Mor extension (Awel y Mor) off North Wales. Larger projects that are expected to enter the planning process soon include Hornsea Project Four off Humberside and further phases of the Seagreen project in the Firth of Forth.²⁹ These projects should start operating by 2030, subject to favourable planning decisions and any required upgrades to the electricity network.

Projects aiming to connect post-2030 include some of the 8 GW of projects in England and Wales that recently signed ‘option-to-lease’ agreements with the Crown Estate as part of ‘Leasing Round 4’,³⁰ and option agreements that will be awarded as part of The Crown Estate Scotland’s upcoming ‘Scotwind’ leasing round.³¹

Including these earlier-stage projects, the UK’s total offshore wind pipeline is over 50 GW. Further leasing rounds will be required to meet

25. BEIS (March 2021). *Second wind for the Humber, Teesside and UK energy industry*. [Link](#)

26. GE (March 2021). *GE Renewable Energy plans to open new offshore wind blade manufacturing plant in Teesside, UK*. [Link](#)

27. BEIS (Updated March 2021). *Renewable Energy Planning Database quarterly extract*. [Link](#)

28. National Grid ESO (July 2020). *Future Energy Scenarios 2020*. [Link](#)

29. Seagreen Wind Energy (undated). *About us*. [Link](#)

30. The Crown Estate (updated February 2021). *Offshore Wind Leasing Round 4*. [Link](#)

31. Crown Estate Scotland (undated). *Scotwind Leasing*. [Link](#)

the ESO’s forecasts of installed offshore wind capacity by 2050; these leasing rounds are likely to include floating offshore wind projects, which are expected to become cheaper over time.³²

Figure 2: Subsidy scheme and planning permission status of UK offshore wind farms.



Source: BEIS and Low Carbon Contracts Company.³³

32. Floating offshore wind farms could be particularly valuable because they can be installed in areas of the seabed that are too deep for conventional offshore wind farms.

33. BEIS (Updated March 2021), *Renewable Energy Planning Database quarterly extract*. [Link](#). Low Carbon Contracts Company (undated), *CfD Register*. [Link](#)

2. Connecting offshore wind farms to the onshore electricity network

To transmit power to customers, offshore wind farms must be connected to the existing onshore electricity network. Under the current system, each offshore wind farm has built its own connection to the onshore network, known as a 'radial connection'. One consequence of this approach is that certain areas of the UK are set to be criss-crossed with underground electricity cables.

Current and planned connections

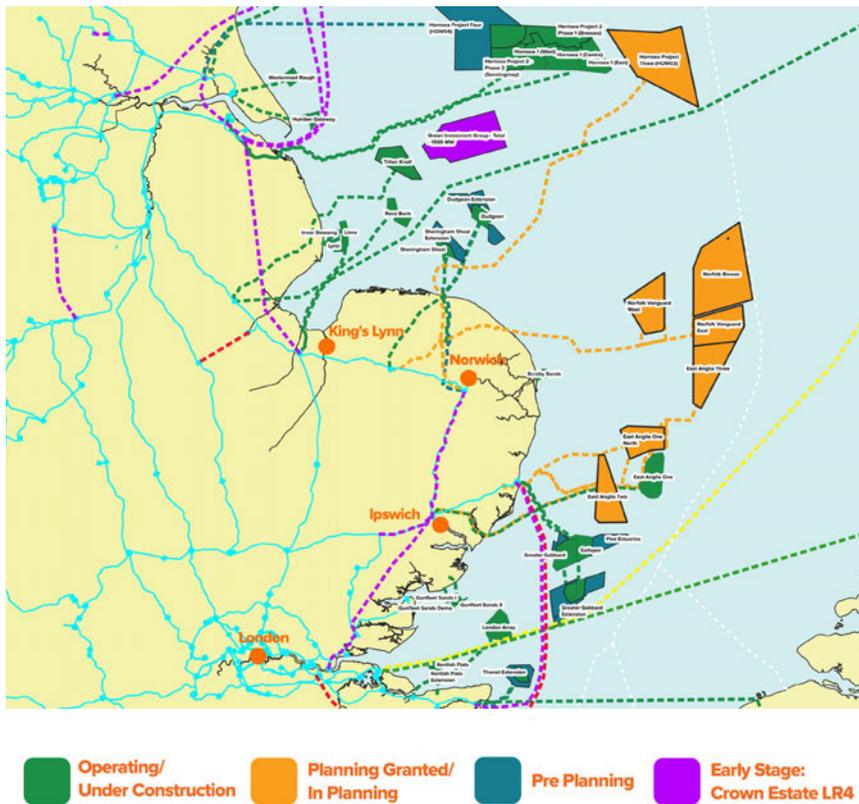
In Norfolk, there are already underground cables that connect the Dudgeon and Sheringham Shoal offshore wind farms to the grid. These are set to be joined by a connection for the Hornsea Three project and a shared connection for the Norfolk Vanguard and Norfolk Boreas wind farms. Longer term, an additional, shared connection is proposed for extensions to the Sheringham Shoal and Dudgeon wind farms (Figure 3).

Once operating, these underground cables have limited impact on local communities; however, there can be significant disruption during the construction process, for example because of road closures and heavy-duty construction vehicles on small, rural roads. Construction can be particularly disruptive where the cables come onshore, known as 'landing points', as these areas are often environmentally sensitive and/or reliant on income from tourism, which some fear will be reduced during the construction period.

One long-term onshore impact of an offshore wind farm is the electricity substation that connects it to the onshore electricity network. As multiple offshore wind farms can connect to a single onshore substation, the onshore substations may need be substantially expanded over time; one example is the planned expansion of the Necton substation in Norfolk, which has met with resistance from local residents.³⁴ The onshore substations are often in rural areas that do not have a history of large-scale infrastructure, except for the existing overhead power lines that the substations are connected to.

34. Eastern Daily Press (December 2017). *Ignored and disregarded - villagers hit out at plans to build huge substations for offshore wind farms.* [Link](#)

Figure 3: Offshore wind farms under development in East Anglia.



Source: Crown Estate, project websites and planning submissions.

As well as the connections to the existing network, offshore wind farms create a need for additional power lines to transit electricity to customers in urban and industrial areas. For example, the ESO has recommended four new subsea electricity cables off the east coast of Great Britain that will predominantly transmit excess wind power from Scotland to customers in England.³⁵ Without these new cables, wind farms in Scotland will increasingly need to be turned down or switched off to avoid overloading the power lines that run between Scotland and England.

Subsea electricity cables can reduce the number of onshore power lines that are required; however, they do not fully remove the need for onshore infrastructure. For example, the proposed subsea cable from Peterhead (Aberdeenshire) to Drax (North Yorkshire) requires at least 37 miles (60 km) of onshore cables between Drax and the coast.

In addition, the ESO has recommended a number of new onshore power lines, mainly driven by offshore wind projects. Figure 5 shows the new power lines that the ESO currently forecasts will be required by around 2030. New onshore power lines are planned between Chesterfield (Derbyshire) and Ratcliffe-on-Soar (Nottinghamshire), between Grimsby (Lincolnshire) and Walpole (Suffolk), and under the Humber estuary.³⁶ The ESO is also considering new power lines between Norwich and

35. Ofgem (June 2021). *Eastern HVDC – Consultation of the project's Initial Needs Case and initial thinking on its suitability for competition.* [Link](#)

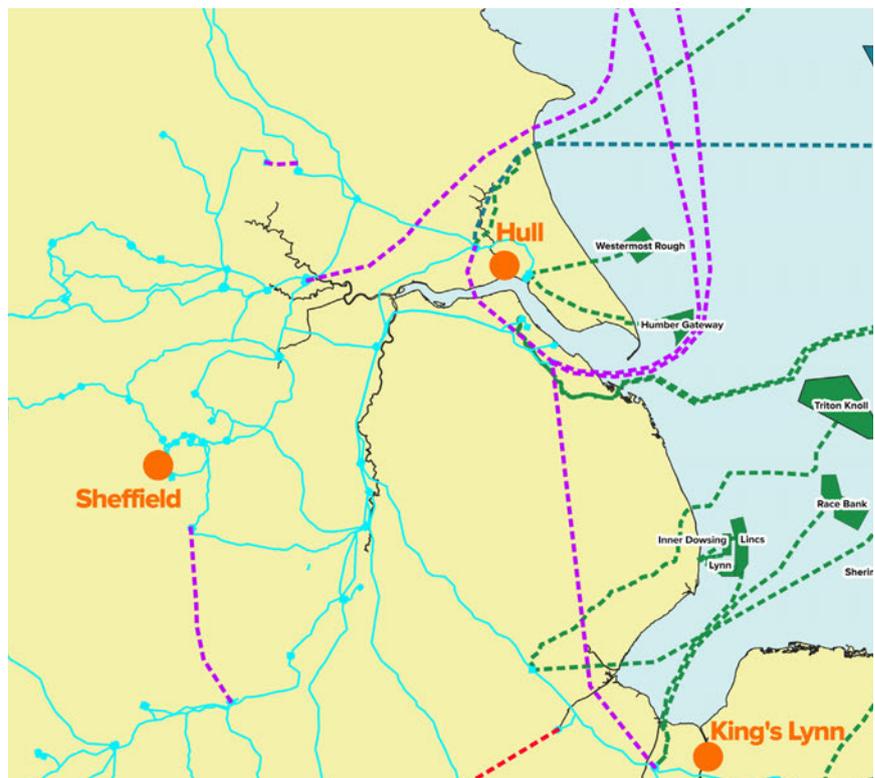
36. See Network Options Assessment 2020/21. [Link](#). Proposed projects referenced are EDNC, GWNC, and CGNC, respectively.

London to transmit electricity generated by offshore wind farms off East Anglia.³⁷

New power lines are not only required for new offshore wind farms. Any new, large-scale generator can create the need for new power lines; for example, the under-construction Hinkley Point C nuclear power station will require new power lines between Hinkley and the Seabank substation, which is 31 miles (50 km) away.³⁸

The ESO's latest Network Options Assessment (2020/21) recommends that fifteen power lines will need to start operating between 2027 and 2031; of these, ten are onshore and five are offshore (Figure 5). These new power lines are in addition to the individual connections for offshore wind farms, which are currently planned separately.

Figure 4: Possible network upgrades in the Humber region (purple)



Source: Network Options Assessment (NOA) 2020/21.³⁹

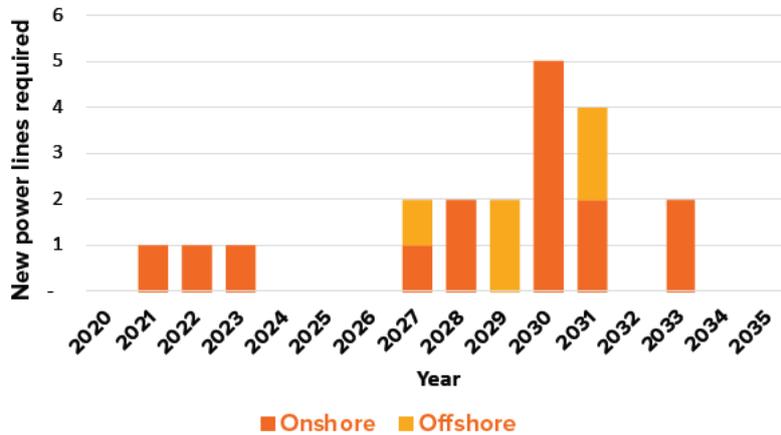
37. See Network Options Assessment 2020/21. [Link](#). See proposed projects AENC, ATNC, and BTNO.

38. Ofgem (undated). *Hinkley - Seabank*. [Link](#)

39. National Grid ESO (undated). *Network Options Assessment (NOA)*. [Link](#). See NOA 2020/21

2. Connecting offshore wind farms to the onshore electricity network

Figure 5: Expected new power lines required in Great Britain, by type and year.

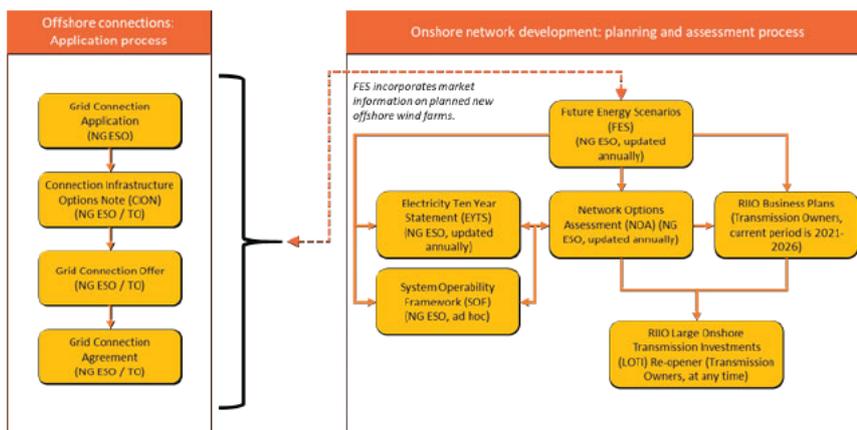


Source: Network Options Assessment (NOA) 2020/21.⁴⁰

Current connections policy

The current connections process for large generators like offshore wind farms is largely separate from the process for upgrading the onshore electricity network (Figure 6). Each process is explained in more detail in Box 1.

Figure 6: Connections and grid development process in Great Britain. (Left) Connections for offshore wind farms. (Right) development of the onshore network.



40. National Grid ESO (undated). Network Options Assessment (NOA). Link. See NOA 2020/21

Box 1: Description of the connection process for offshore wind projects, and for upgrades to the onshore electricity network.

Offshore wind projects

For offshore wind projects, the developer first applies to the ESO for a grid connection. The ESO then works with the project developer and the relevant Transmission Owner to assess the options for connecting the project to the onshore network; this stage includes identifying the optimal landing point where the cables should meet the shore.⁴¹ The 'optioneering' process is summarised in the Connection and Infrastructure Options Note (CION).⁴²

Once the optimal connection method has been identified, the ESO issues a 'Connection Offer' to the project developer; the developer has ninety days to accept the offer. Once the offer is accepted, there is a binding 'Connection Agreement' between the developer and the ESO, and a separate binding agreement between the ESO and the relevant Transmission Owner.

Onshore electricity network

The planning and assessment process for the onshore electricity network is significantly more complicated than for an offshore wind farm. The process starts with the Future Energy Scenarios, produced annually by the ESO.⁴² These scenarios explore a range of future outcomes for the development of Great Britain's energy system, based on different technology costs, societal preferences, and rates of decarbonisation. The Future Energy Scenarios aim to incorporate the latest information on new generation projects, including planned offshore wind farms.⁴³

The Future Energy Scenarios are used by the ESO to assess:

- Future flows on the electricity network, via the Electricity Ten Year Statement (ETYS);⁴⁵
- Future operational requirements, via the System Operability Framework (SOF);⁴⁶

The ESO uses these two documents, combined with the Future Energy Scenarios, to recommend options for upgrading the onshore electricity network, through the Network Options Assessment (NOA).⁴⁷ The NOA recommends network upgrades (for example new power lines, substations or non-network 'commercial solutions') that can reduce customer bills by integrating new sources of generation whilst minimising constraints on the electricity network.⁴⁸

Finally, the Transmission Owners and Ofgem use the NOA as part of the process to approve individual investments in new and upgraded power lines and substations, through the 'RIIO' regulations.^{49,50}

Strengths of the current connections policy

The UK has installed more offshore wind farms than any other country, supported by the current system of individual grid connections for each offshore wind farm.⁵¹ The current connections policy has several benefits, namely:

51. Global Wind Energy Council (March 2021). *Global Wind Report 2021*. [Link](#). Page 52. UK is home to 29% of global installed offshore wind capacity; China 28%; Germany 22%.

41. The relevant Transmission Owner (TO) is: (England and Wales) National Grid Electricity Transmission; (South Scotland) SP Energy Networks Transmission; (North Scotland) SSE Networks Transmission.

42. National Grid ESO (updated November 2018). *The Connection and Infrastructure Options Note (CION) process*. [Link](#)

43. National Grid ESO (undated). *ESO Future Energy Scenarios*. [Link](#)

44. National Grid ESO (July 2020). *FES Modelling Methods 2020*. [Link](#). Pages 16 and 17.

45. National Grid ESO (undated). *Electricity Ten Year Statement (ETYS) 2020*. [Link](#)

46. National Grid ESO (undated). *System Operability Framework (SOF)*. [Link](#)

47. National Grid ESO (undated). *Network Options Assessment (NOA)*. [Link](#)

48. Technically the process aims to find the 'optimal' level of constraint costs. The optimal level of constraints is greater than zero because it would cost more to upgrade the network to avoid all constraints. Commercial solutions include the 'Power Potential' project run by the ESO and UK Power Networks, which aims to use small-scale generators on the distribution network to manage voltage issues on the transmission network. If successful, this will release additional network capacity, which reduces constraints on the network and therefore reduces customer bills. [Link to Power Potential](#).

49. Ofgem (December 2020). *RIIO-2 Final Determinations for Transmission and Gas Distribution network companies and the ESO*. [Link](#). Note: network upgrades can either be approved at the start of each 6-year 'RIIO Business Plan' or at any time through the 'Large Onshore Transmission Investment' (LOT) or Medium Sized Investment Projects (MSIP) processes.

50. Ofgem's approval process also includes project-specific cost-benefit analysis and an engineering review.

#1: Minimises delivery risk for developers:

UK offshore wind farms typically build their own grid connection.⁵² This means that the developer has more control over the connection timeline, minimising the risk of unexpected delays to the grid connection.⁵³

Because risks are reduced, owners of offshore wind farms are able to access cheaper sources of finance (both debt and equity), which puts downwards pressure on the prices that offshore wind farm developers bid into the Contracts for Difference subsidy auctions.

In markets where the grid connection is not built by the developer of the offshore wind farm, complex contracts may be needed to indemnify the project (partially or fully) against delays to the grid connection.

The current system also minimises the risk of overinvesting in coordinated grid connections that are never used due to future projects not being built, for example if proposed wind farms are unexpectedly refused planning permission.

#2: Harnesses competition:

Under the UK's Offshore Transmission Owner (OFTO) regime, each offshore wind farm builds their own grid connection; once operational, the developer is required to sell the asset to a third-party, which owns and operates the connection for the lifetime of the grid connection; this is partly because the grid connection may outlast the wind farm.⁵⁴ The ownership of the each grid connection (the OFTO) is allocated through competitive tenders run by Ofgem, which promote competition and reduces costs.⁵⁵ Unlike these offshore networks, the onshore network is built, owned and operated by regional monopolies (the Transmission Owners).

#3: Free from political interference:

The current network planning process operates independently of the Government and Ministers; it is run by a combination of Ofgem, the ESO and the Transmission Owners. This encourages the industry to pursue least-cost solutions, rather than being subject to the changing preferences of different Ministers or political parties; the electricity networks are still subject to marine and terrestrial planning laws set by Parliament, which, for example, discourage or even ban the construction of electrical infrastructure in areas that are environmentally sensitive or have high visual amenity, such as designated 'Areas of Outstanding Natural Beauty' (AONB). However, this technocratic system leads to a lack of political accountability, as discussed below.

Weaknesses of the current connections policy

Despite the UK's relatively successful offshore wind rollout so far, the current system of grid connections suffers from a number of weaknesses that have been exposed by the UK's increasingly ambitious offshore wind targets. These are:

52. Ofgem (undated). *Offshore transmission policy design*. [Link](#). Under the enduring regime, offshore developers have the flexibility to choose whether they or an OFTO design and construct transmission assets.

53. There is still a risk of delays caused by the onshore Transmission Owner (TO); however, experience shows that this is unlikely.

54. Ofgem (undated). *Offshore transmission*. [Link](#)

55. Ofgem (undated). *Offshore transmission tenders*. [Link](#)

#1: Lack of accountability.

Under the current system, responsibility for planning Great Britain's onshore and offshore electricity network is split across the following organisations:

- Transmission Owners: Proposing options to upgrade the network, including as part of the Network Options Assessment (NOA).
- National Grid ESO: Preparing grid connection offers, including through the CION process, and evaluating options to upgrade the onshore network through the NOA.
- The Crown Estate: Leasing areas of the seabed to offshore wind farm developers, including cable routes.⁵⁶
- BEIS: Granting planning permission (Development Consent Orders) for offshore wind farms and associated infrastructure, including onshore substations.^{57,58}
- Ofgem: Approving the cost of connections for offshore wind farm (OFTOs); approving the business plans of the Transmission Owners through the RIIO regulatory framework,⁵⁹ and ad-hoc applications for network upgrades through the Large Onshore Transmission Investment' (LOTI) Re-opener or 'Medium Sized Investment Projects' (MSIP) Re-opener processes, depending on the value of the proposed investment.⁶⁰

Because responsibility is shared, there is no organisation or individual that is wholly responsible for planning the onshore and offshore electricity network in Great Britain. This split accountability creates a lack of clear strategic planning, which risks delivering piecemeal infrastructure rather than the step changes needed to deliver a network fit for Net Zero by 2050. Split accountability also makes it difficult for Parliament, the Government, the public, and the electricity industry to scrutinise planned network upgrades.

The current system of network planning also suffers from limited input from Ministers. Arguably this is a strength because, as described above, it avoids the risk of changing Government preferences as successive Ministers come and go. However, a lack of political involvement means that there can be a disconnect between the Government's aims, for example Net Zero, and the assumptions used to plan the network.

For example, in the ESO's 2015 Future Energy Scenarios, only one of the four planning scenarios met the Government's legally-binding target for an 80% reduction in carbon emissions by 2050.⁶¹ In the 2020 Future Energy Scenarios, three of the four planning scenarios met the Government's updated legally-binding target for Net Zero emissions by 2050, but one did not.⁶² This doesn't suggest that there are any inherent deficiencies in the FES process, but it is important to understand how these scenarios impact on the network planning process.

There is also split responsibility for planning the use of the UK's seas; the Marine Management Organisation (MMO) is responsible for the statutory

56. In Scotland, responsibility of Crown Estate Scotland.

57. In Wales and Scotland, responsibility of the Welsh and Scottish Governments, respectively.

58. BEIS (updated June 2021). *Energy infrastructure development applications: decisions*. [Link](#)

59. Ofgem (undated). *Current network price controls (RIIO-1)*. [Link](#)

60. Ofgem (March 2021). *Large Onshore Transmission Investments (LOTI) Re-opener Guidance*. [Link](#)

61. National Grid ESO (July 2015). *Future Energy Scenarios (2015)*. [Link](#). Page 5.

62. National Grid ESO (July 2020). *Future Energy Scenarios (2020)*. [Link](#). Page 6.

‘marine planning’ process in England,⁶³ but The Crown Estate and Crown Estate Scotland have a powerful role in determining which areas of the seabed are leased to developers of offshore wind farms through their various leasing rounds. As with the network planning process, the marine planning process would benefit from more input from politicians to guide the trade-offs across different seabed users.

#2: Doesn't fully account for disruption to local communities.

Today, network planning aims to reduce the cost paid by customers for new network infrastructure. However, it is not clear that the process fully considers non-monetary costs such as disruption to local communities during the construction process and the visual impact of new power lines and substations.⁶⁴ This means the chosen connection method may be cheaper, benefitting all customers in Great Britain, but have worse impacts on the communities that host new infrastructure.

There are protections for local communities, including planning laws; however, it is clear that some communities feel like they are bearing a disproportionate impact of new infrastructure.⁶⁵ Today, this new infrastructure is concentrated in East Anglia; however, as more offshore wind farms are installed there could be similar issues in North Wales, Humberside and the east coast of Scotland, as described below.

In some cases, Ofgem has a clear policy to minimise disruption to the communities that host electricity infrastructure. For example, under Ofgem's *Visual Amenity* policy, Transmission Owners can apply for funding to reduce the impact of electricity infrastructure on Areas of Outstanding Natural Beauty (AONBs), for example by burying existing power lines.⁶⁶ However, this policy does not apply to connections for new offshore wind farms, which are typically underground.

In other cases, Ofgem implicitly values connection methods that can be delivered faster and have less visual impact. For example, Ofgem has not challenged offshore wind farms developers when they have pursued underground cables to connect their projects to the onshore network, even though overhead power lines would almost certainly be cheaper; overhead lines are more likely to suffer delays due to planning hurdles and legal challenges.⁶⁷

Where new network infrastructure is required, the current network planning process does not automatically provide compensation for affected communities.^{68,69} This is out of sync with the Government's guidance for onshore wind farms in England, which are advised to make an annual payment of £5,000 per MW per year to community projects through a 'Community Benefit Fund'; under the guidance, a typical 30 MW onshore wind farm would pay £150,000 per year to local projects.⁷⁰

Community Benefit Funds can be used to upgrade village halls and sports facilities or to provide enhanced local services. There is no reason why the Government's approach to Community Benefit Funds for onshore wind farms could not be extended to communities that host new network infrastructure.

63. In Scotland, responsibility of "regional Marine Planning Partnerships ([Link](#)). In Wales, responsibility of the Welsh Government ([Link](#)). In Northern Ireland, responsibility of the Department of Agriculture, Environment and Rural Affairs ([Link](#)).

64. When planning new infrastructure, the TOs do take into account environmental and socio-economic factors. However, it is not clear that these are fully accounted for or that the TOs put the appropriate weight on these factors. See: National Grid (2012). *Our approach to Options Appraisal*. [Link](#). Page 11.

65. Eastern Daily Press (December 2017). *Ignored and disregarded - villagers hit out at plans to build huge substations for offshore wind farms*. [Link](#)

66. Ofgem (undated). *Visual Amenity*. [Link](#)

67. For example, a proposed overhead line between Northern Ireland and the Republic of Ireland has been repeatedly delayed due to legal challenges in both jurisdictions. See: *Uster Business* (September 2020). *Long-awaited North-south interconnector given green light for Northern Ireland*. [Link](#)

68. Project developers do provide compensation to those directly affected by the works, for example farmers who lose income including farm subsidies. However, developers are not required to provide compensation for loss of visual amenity and disruption during construction.

69. Transmission Owners also make voluntary payments to affected communities. For example, National Grid provides grants of up to £20,000 to community organisations and charities in areas affected by major infrastructure projects. See: National Grid (undated). *Community Grant Programme*. [Link](#)

70. Department for Energy and Climate Change (2014). *Community Benefits from Onshore Wind Developments: Best Practice Guidance for England*. [Link](#)

#3: Lack of long-term planning.

The Future Energy Scenarios cover the period from now to 2050; however, the ESO only plans the electricity network approximately ten years ahead of time, through a combination of the Network Options Assessment (NOA), the Electricity Ten Year Statement (ETYS), and the System Operability Framework (SOF).

In a slowly changing electricity system with few new generators, a ten-year planning horizon was sufficient. However, the Net Zero target and the falling cost of renewables means that the electricity system is changing rapidly, and significant new network infrastructure is needed.

Some of this network infrastructure could have a lifetime of over fifty years. It is therefore critical that network planners consider the long-term impact of infrastructure that is approved and/or built in the next few years.⁷¹ For example, without long-term planning, network infrastructure built to meet the 2030 offshore wind target (40 GW) may make it more expensive to meet the UK's longer term decarbonisation goals, which the ESO forecasts will require 80-100 GW of offshore wind.⁷²

In addition, the current system does not encourage projects to coordinate with each other. For example, an offshore wind farm expecting to commission in 2025 could construct an oversized grid connection that could also be used by a nearby offshore wind farm that would connect in 2030 – known as ‘anticipatory investment’.

However, the current system does not encourage the developer of the first project to build the larger connection. It is not always clear whether Ofgem would approve the cost of the larger grid connection, which would leave the first project with no guarantee that they would be paid back if the second wind farm is delayed or not built for any reason.⁷³

As described above, some of the ESO's Future Energy Scenarios do not meet the Government's legal-binding decarbonisation obligations. Because these scenarios play a critical role in the network planning process, the presence of these higher-emission scenarios risks delays to projects that would reduce the cost of meeting Net Zero.⁷⁴

This problem is exacerbated by the main network planning methodology (‘least-worst regrets’), which is used by Ofgem and the ESO to evaluate investments in the electricity network; the outcome of least-worst regrets analysis is driven by the most extreme scenarios, including the ‘Steady Progression’ Future Energy Scenario that does not achieve Net Zero by 2050.^{75,76}

Ofgem has recently published independent research that expresses particular concern about the use of ‘least-worst regrets’ analysis for network planning.⁷⁷ The report suggests that new approaches are needed to plan Great Britain's electricity network, including more traditional probability-based analysis that assigns a different probability to each planning scenario.⁷⁸

In the latest Network Options Assessment (NOA 2020/21), Ofgem approved the ESO's proposal to trial an amended ‘least-worst regrets’ (LWR) methodology known as ‘least-worst weighted regrets’ (LWWR).⁷⁹

71. The NOA does consider the lifetime benefit of the options that it recommends. The point here is that the planning horizon must be sufficiently long that options recommended now are complementary to options that might be recommended in 3-, 5- or 10-years' time.

72. National Grid ESO (July 2020). *Future Energy Scenarios 2020*. [Link](#). Range quoted for the three scenarios that meet Net Zero.

73. The current rules do allow for this type of ‘anticipatory investment’. However, in practice, this provision has never been used, which suggests that it is not currently an attractive option for developers of offshore wind farms.

74. There is clearly a role for planning scenarios that have a slower or faster pace of decarbonisation; however, network planners must ensure that these scenarios do not have undue influence.

75. National Grid ESO (January 2021). *Network Options Assessment 2020/21*. [Link](#). See dates when individual upgrades are required on pages 32 to 52. The date required in the ‘Steady Progression’ scenario (which doesn't meet Net Zero) is often several years later than the date required in the scenarios that meet Net Zero. Note that the NOA process includes additional checks that aim to ensure that recommendations are robust, including applying additional scrutiny to recommendations driven by a single scenario.

76. NERA Economic Consulting (December 2016). *Methods for Planning Under Uncertainty* (Cambridge EPRG Winter Conference). [Link](#)

77. Ofgem (December 2020). *Decision making for future energy systems*. [Link](#)

78. Unlike least-worst regrets, which has no probabilities, leading to outcomes dominated by extreme scenarios.

79. Ofgem (December 2020). *Approval of 2020 Network Options Assessment methodology (letter)*. [Link](#)

This new methodology includes probability weighting to guard against outcomes being driven by one extreme scenario. For future iterations of the NOA, the ESO plans to use the new LWWR technique as a business-as-usual process.⁸⁰

#4: Doesn't sufficiently encourage developers to build and connect projects near to customers.

There are currently relatively weak incentives for developers to build and connect their offshore wind farms near to customers; this is one reason why so much new electricity network infrastructure is needed. Developers are incentivised to connect to the electricity grid as cheaply as possible, leaving the ESO to work out how to get that electricity to customers.

If electricity generated by an offshore wind farm cannot reach customers because the local network is overloaded, then the ESO pays the wind farm to switch off, raising electricity bills through 'constraint costs'. As more wind farms have been connected to the grid, constraints costs have risen from approximately £200m in 2014/15 to approximately £450m in 2018/19.⁸¹

Today, these constraints costs are mainly incurred when the ESO pays wind farms in Scotland to turn down or switch off to stop the power lines between Scotland and England from becoming overload. In future, the electricity network in East Anglia is likely to be increasingly constrained as more offshore wind farms connect there; therefore, each new wind farm built in these 'constrained' areas provides less overall value to the electricity system unless and until the network is upgraded.⁸² If the electricity market rules were reformed to encourage developers to build projects in place where they are most valuable and can therefore reduce energy bills the most, then it is possible that these wind farms off East Anglia would have sought a grid connection nearer to London, where demand for electricity is higher.

Despite significant investment in new network infrastructure, the ESO expects constraint costs to rise to up to £2bn per year by the late-2020s, before falling again in the early-2030s as new power lines are built.⁸³

Regional transmission charges and transmission losses encourage developers to build projects nearer to customers; however, the current system has weaknesses that will be hard to address.

All large generators pay annual network charges to connect to Great Britain electricity transmission network.⁸⁴ Network charges are higher in Scotland, reflecting an excess of generation that needs to be exported to England and Wales.⁸⁵ Network charges therefore encourage project developers to build projects further south in Great Britain, which contributes to reducing network constraints. The GB electricity market also includes transmission losses that vary by region. This encourages generation and demand to locate closer to each other. Regional transmission losses were introduced in April 2018,⁸⁶ following an investigation by the Competition and Markets Authority.⁸⁷

80. National Grid ESO (May 2021). *Network Options Assessment Methodology: for consultation*. [Link](#)

81. Cornwall Insight (January 2020). *Constraints – Can't stop loving you*. [Link](#)

82. The coming constraints in East Anglia are demonstrated by the ESO recommendation in the NOA for new onshore and offshore power lines between East Anglia and the London area.

83. National Grid ESO (June 2021). *Modelled Constraint Costs – NOA 2020/21*. [Link](#)

84. National Grid ESO (undated). *Transmission Network Use of System (TNUoS) charges*. [Link](#)

85. National Grid ESO (April 2019). *TNUoS guidance for generators*. [Link](#)

86. Exon (undated). *Glossary: Transmission Losses*. [Link](#)

87. Competition and Markets Authority (June 2016). *Energy market investigation: final report*. [Link](#)

Network charges and transmission losses both provide locational signals to generators and demand. However, there are two major limitations of this approach:

1. Locational network charges do not encourage generators and demand to react to local supply and demand for electricity, because they are mostly fixed charges.⁸⁸ For example, a battery or a green hydrogen producer in Scotland sees the same wholesale price as one in the southwest of England, even though local supply and demand could be very different.
2. The current network charging regime discourages developers from building energy storage projects in Scotland, even though storage could help to reduce transmission constraints. Ofgem's ongoing Significant Code Review could resolve this issue with energy storage;⁸⁹ however, it will remain inefficient to use network charges, which are set ahead of time, to resolve network constraints, which occur in real time and vary from hour to hour. The only way to address this weakness is to vary network charges in real-time, which is effectively equivalent to implementing local electricity pricing in the wholesale electricity market.

As discussed in Policy Exchange's recent report, *Powering Net Zero*, unless these locational issues are addressed, socialised 'system balancing costs' will continue to rise as more offshore wind farms are built. Without reform, cost increases during coronavirus lockdown in spring and summer 2020 could become the norm, meaning that customers won't benefit fully from the falling cost of offshore wind farms.⁹⁰

Risks from continuing with the current system

The first phase of the ESO's 'Offshore Coordination Project', published in December 2020, provides the first view of how the electricity network could look in 2050 under the current network planning rules (Figure 7). The ESO's study shows that the current rules would lead to unacceptable outcomes, including:

- Significant disruption for coastal and rural communities caused by the new network infrastructure required for each offshore wind farm;
- Risk of environmental degradation in environmentally sensitive areas offshore, onshore and at landing points for subsea cables; and
- Higher costs and therefore higher bills compared to a coordinated onshore and offshore electricity network, as described below.

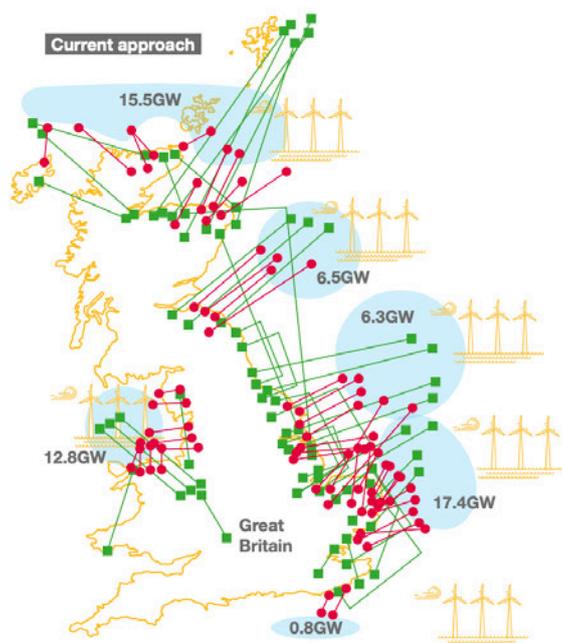
Uncoordinated development will also affect communities further onshore as more new power lines will be needed to bring wind power to customers in urban centres like London.

88. .e. there is poor 'dispatch efficiency'.

89. Ofgem (undated). *Reform of network access and forward-looking charges*. [Link](#)

90. See Policy Exchange (December 2020). *Powering Net Zero*. [Link](#). Pages 29-33.

Figure 7: Illustrative network design in 2050 (current policy).



Source: National Grid ESO.⁹¹

Without reform, the Government risks growing public resistance to offshore wind farms, including through the courts;⁹² this could put the Government's offshore wind targets at risk. In an extreme scenario, concerns over network infrastructure for offshore wind farms could lead to severe delays or even a pause on development, similar to restrictive planning rules enacted for onshore wind farms in England or the moratorium on fracking.⁹³

Benefits of an integrated approach

To reduce the negative impacts of new network infrastructure, several parties have called for reform, including in Parliament.^{94,95} Advocates argue that a coordinated offshore electricity network, sometimes called an offshore wind 'ring main', should be used to connect multiple wind farms to customers in demand centres like London via fewer, larger cables.

A coordinated offshore electricity network would reduce the number of landing points, underground cables, and overhead power lines that will be needed to transmit wind power to customers in urban and industrial centres. Even with a coordinated approach offshore, there will still need to be reinforcements to the onshore electricity network to transmit electricity from the coast to customers further inland. It is critical important that coordination includes both the onshore and offshore network.

91. National Grid ESO (December 2020). *Offshore Coordination Phase 1 Final Report*. [Link](#). Page 20.

92. RE News (February 2021). *Judge quashes consent for Norfolk Vanguard*. [Link](#)

93. BE S, Oil and Gas Authority (November 2019). *Government end support for fracking*. [Link](#)

94. Eastern Daily Press (September 2019). *Hope grows that Norfolk countryside won't have to be dug up for every new wind farm*. [Link](#)

95. Hansard (November 2020). *Adjournment Date: Offshore Wind Transmission Connections*. [Link](#)

A coordinated offshore electricity network was considered and rejected in the early 2010s.

In 2011-2012, the Department for Energy and Climate Change (DECC) and Ofgem ran a project, the Offshore Transmission Coordination Project, to assess the possible benefits of developing a coordinated offshore electricity network.⁹⁶ The project found that a coordinated approach could save £0.5bn – £3.0bn by 2030 (8-15% of costs), compared to the existing approach of individual (radial) connections for each offshore wind farm.

However, the project also noted significant risks from pursuing a coordinated approach, including: risks to security of supply due to relying on fewer, larger cables; reliance on transmission technologies that were not yet commercially proven; and the risk of stranded investments in larger grid connections that may not be required.⁹⁷ The project also found that the benefits of coordination varied between zones, and that in some zones the current approach was still the most cost-effective solution.

Ofgem and DECC concluded that:

“These findings, in combination with the high levels of uncertainty surrounding long-term offshore generation build-out, supports an incremental, evolutionary approach to network development rather than the building of a large-scale, meshed network from the outset.”

This decision was understandable given that offshore wind technology was nascent, and offshore transmission technology was relatively unproven. Other countries, such as Belgium, took a different approach, planning and implementing a coordinated offshore network earlier (Box 2).

96. Ofgem, DECC (March 2012). *DECC/Ofgem Offshore Transmission Coordination Project*. [Link](#)

97. Ofgem and DECC (March 2012). *DECC/Ofgem Offshore Transmission Coordination Project*. [Link](#). Pages 5 and 6.

2. Connecting offshore wind farms to the onshore electricity network

Box 2: Belgium's 'Modular Offshore Grid' (MOG)

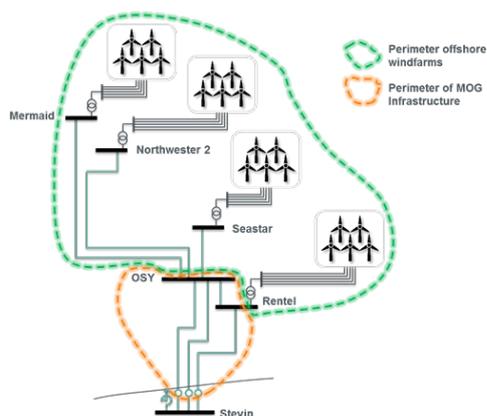
The Belgian Transmission Owner, *Elia*, has recently built an offshore substation that will be used to connect at least four offshore wind farms to the onshore electricity network. The offshore substation is the backbone of Belgium's 'Modular Offshore Grid'.

The first offshore wind farms built in Belgium each have their own connection to the onshore electricity network, similar to the current system in Great Britain. As more wind farms were developed, *Elia* developed plans for the Modular Offshore Grid, which will reduce the impact of new cables on the local environment; *Elia* estimates that the coordinated offshore network uses 30-40km less cable compared to an uncoordinated approach.

The coordinated offshore network could be expanded to include more offshore wind farms or new interconnectors, for example between Belgium and Great Britain. Belgium's Modular Offshore Grid could also be integrated into a future 'offshore supergrid' in the North Sea.

Belgium's Modular Offshore Grid is currently a similar size to the proposed Hornsea 3 offshore wind farm in the UK (2.4 GW). This suggests any modular offshore grid in the UK will need to have more capacity than currently planned in Belgium, which may require new HVDC equipment to be developed.

Figure 8: Network diagram of Belgium's 'Modular Offshore Grid'.



Source: *Elia*.⁹⁸

Increasing deployment of offshore wind means that the Government, Ofgem, and the ESO are now looking again at a coordinated approach to Great Britain's onshore and offshore electricity network.

In spring 2020, the ESO started its *Offshore Coordination Project* to explore the potential for more coordination.⁹⁹ The first phase of the project analysed the potential impact of connecting over 80 GW of offshore wind to Great Britain's electricity network by 2050, which the ESO's *Future Energy Scenarios* suggest is needed to achieve Net Zero. The ESO analysed the

99. National Grid ESO (undated). *Offshore Coordination Project*. [Link](#)

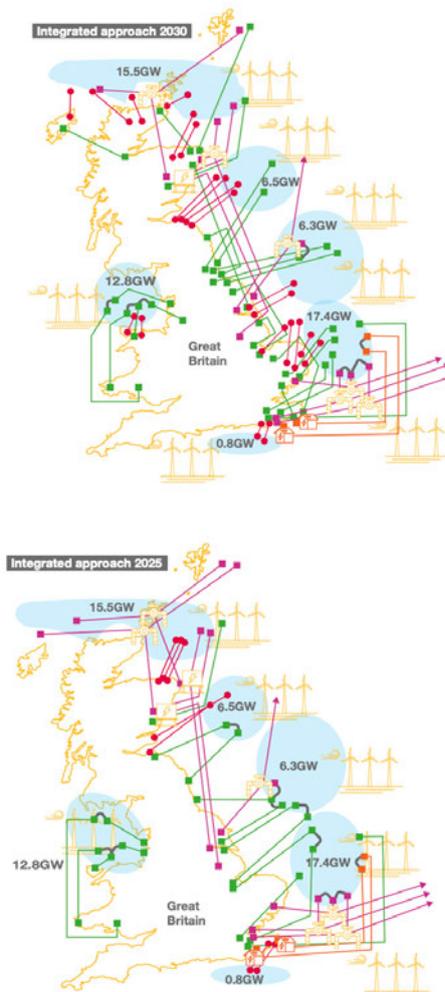
98. *Elia* (undated). *Modular Offshore Grid*. [Link](#)

current approach (Figure 7) and alternative illustrative scenarios where a coordinated approach is delivered for projects connecting from 2030 onwards or from 2025 onwards (Figure 8).

The ESO’s analysis shows that an integrated approach could significantly reduce the new infrastructure required onshore and offshore, as well as reducing the number of landing points. The ESO found that an integrated approach could reduce the number of landing points by 50% if delivered by 2025, or 30% if delivered by 2030 (Table 2).

The ESO’s study also found that a coordinated approach could reduce the cumulative cost of building and operating new network infrastructure by £3bn-£6bn by 2050 (8%-18%), depending on how quickly coordination can be delivered.

Figure 9: Illustrative network design in 2050. (top) Integrated approach for projects connecting from 2030 onwards. (bottom) Integrated approach for projects connecting from 2025 onwards.



100.National Grid ESO (December 2020). Off-shore Coordination Phase 1 Final Report. [Link](#). Page 20.

Source: National Grid ESO.¹⁰⁰

2. Connecting offshore wind farms to the onshore electricity network

Table 2: Impact of an integrated approach.

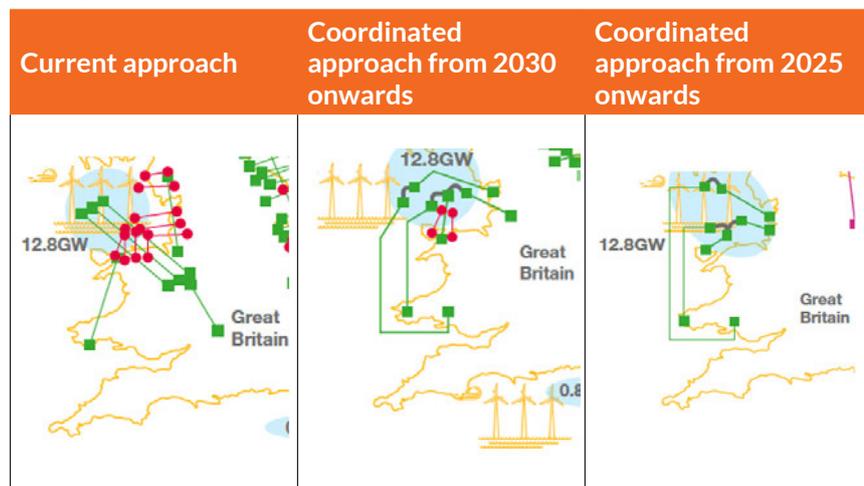
Year that integrated approach is delivered from. ¹⁰¹	Cumulative savings by 2050 (capital and operating costs)	Reduction in cable landing points
2025	£6bn (18%)	50%
2030	£3bn (8%)	30%

Source: National Grid ESO.¹⁰²

The impact of a coordinated approach can be clearly seen by focusing on individual UK regions.

In Wales, a coordinated approach could see offshore wind farms in the Irish Sea off North Wales connected to the onshore electricity network in South Wales, where the grid is stronger and there are more customers (Table 3). Without coordination, new electricity networks will be needed across North Wales to transmit power to stronger parts of network in the English Midlands.

Table 3: Illustrative design of the electricity network in 2050: Wales.



Source: National Grid ESO.¹⁰³

There is a similar situation on the east coast of England, where a coordinated approach would significantly reduce the number of new connections and other grid upgrades (Table 4).¹⁰⁴ If a coordinated approach could be delivered for projects connecting from 2025 onwards, then new subsea cables could be built to transmit electricity directly to London via the Thames Estuary, rather than over land across East Anglia. This proposed offshore network is sometimes known as an offshore wind ‘ring main’.

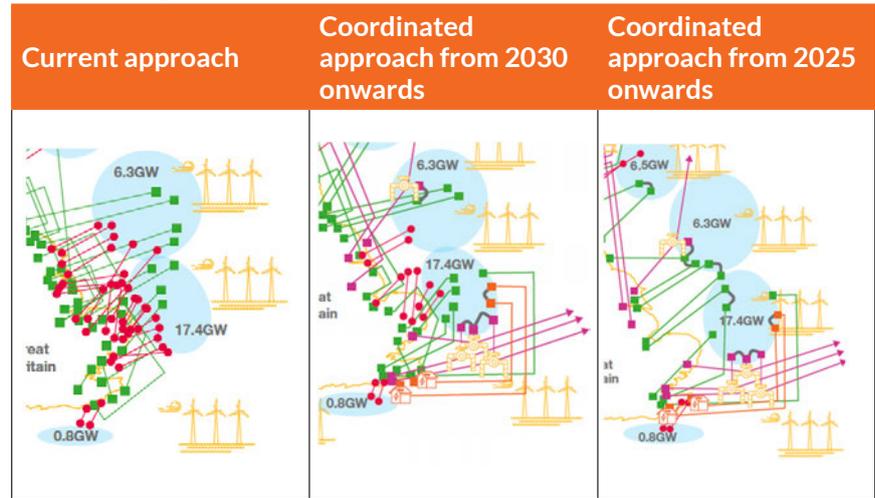
102. National Grid ESO (December 2020). *Offshore Coordination Phase 1 Final Report*. [Link](#). Page 4.

103. National Grid ESO (December 2020). *Offshore Coordination Phase 1 Final Report*. [Link](#). Page 20.

104. Note that the ESO’s analysis does not show existing connections for offshore wind farms; in East Anglia this includes the following wind farms: East Anglia One, Gager, Greater Gabbard, Sheringham Shoal and Dudgeon (Figure 3: Offshore wind farms under development in East Anglia.).

101. Note that the ‘year’ is the date that the offshore wind farm starts operating. Construction may begin several years earlier. i.e. for an integrated approach by 2025, construction may need to start in 2022 or 2023.

Table 4: Illustrative design of the electricity network in 2050: East coast of England.



Source: National Grid ESO.¹⁰⁵

The main caveat to the ESO’s analysis is that it would be incredibly difficult to deliver a coordinated approach for projects connecting by 2025, without delaying the connection dates for those projects. Many of the projects aiming to connect by 2025 have been under development since at least 2010, when the Crown Estate awarded leases to developers as part of the third seabed leasing round (Leasing Round 3).¹⁰⁶

Some of these projects have already secured planning permission or are hoping to secure planning permission during 2021, in advance of the fourth round of the Contracts for Difference auctions due to open December 2021.¹⁰⁷

Implementing a coordinated approach for these projects would require the Government to underwrite any new risks faced by project developers, including the risk of delays to the coordinated network. Otherwise, the Government risks damaging hard-won investor confidence in the UK’s offshore wind sector, which would raise the cost of future offshore wind farms.

If the design of projects cannot be changed without risking major delays and cost increases, then the Government and industry can consider other measures to reduce the impact on affected communities. For example, projects can coordinate construction timelines and reduce visual impact through measure such as additional tree planting; alternatively, the Government could provide compensation.

Any coordinated approach will also need to demonstrate that it is compatible with security of supply, a concern that was raised during DECC and Ofgem’s assessment of a coordinated approach in the early 2010s.¹⁰⁸

To address these thorny issues, the Government established the Offshore Transmission Network Review (OTNR) in July 2020.¹⁰⁹ The OTNR is explored in detail in the next section.

105. National Grid ESO (December 2020). *Offshore Coordination Phase 1 Final Report*. [Link](#). Page 20.

106. Crown Estate (2020). *Playing our part in the growth of UK offshore wind*. [Link](#)

107. BE S (Updated April 2021). *Contracts for Difference (CFD): Allocation Round 4*. [Link](#)

108. Ofgem and DECC (March 2012). *DECC/Ofgem Offshore Transmission Coordination Project*. [Link](#). Page 37.

109. BE S (July 2020). *Offshore transmission network review*. [Link](#)

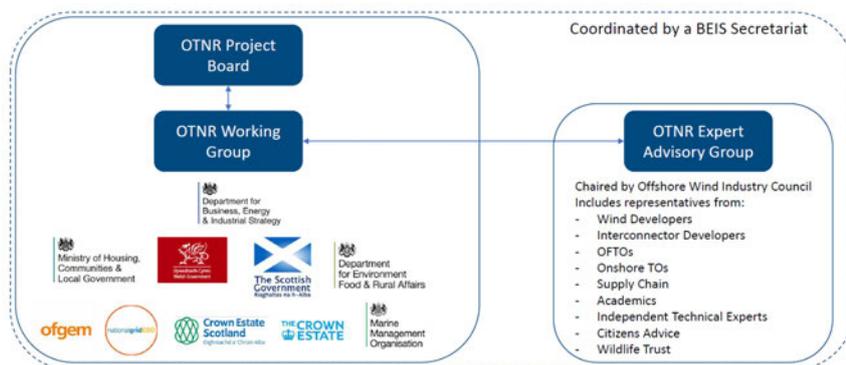
3. The Offshore Transmission Network Review (OTNR)

The benefits of a coordinated approach are now well-known; however, there are still major barriers to planning and implementing a coordinated onshore and offshore electricity network. To enable coordination, the Government, Ofgem and the ESO will need to overhaul the entire grid connections process, with knock-on impacts on marine planning, seabed leasing, consenting (planning permission), network planning, offshore wind auctions (CfDs), the delivery model for onshore transmission, and the regulation and ownership of grid connections for offshore wind farms.

Structure of the OTNR

In July 2020, the Government established the Offshore Transmission Network Review (OTNR) to bring together the various Departments, regulators and companies involved in the development of offshore wind farms and Great Britain's electricity network (Figure 9).

Figure 10: Structure of the Offshore Transmission Network Review.



Source: BEIS.¹¹⁰

The aim of the OTNR is:

“[To] ensure that the transmission connections for offshore wind generation are delivered in the most appropriate way, considering the contribution offshore wind is expected to make towards net-zero by 2050. This will be done with a view to finding the appropriate balance between environmental, social and economic costs”.¹¹¹

110.BE S (December 2020). *Offshore Transmission Network Review Webinar (17th December 2020)*. [Link](#). Page 9.

111.BE S (December 2020). *Offshore Transmission Network Review Webinar (17th December 2020)*. [Link](#). Page 7.

This explicitly recognises the environmental and social impacts of grid connections for offshore wind farms, something that is not fully accounted for in the current approach, as described earlier in this report. The main challenge for the OTNR is to address the known weaknesses of the current system without losing its current strengths.

The OTNR must also find solutions that can reduce the social and environment impact of projects under development ('in-flight'), without risking delays or harming investor confidence. Recognising this challenge, the OTNR is split into four workstreams, each of which is developing different approaches for projects at each stage of development (Table 5). The OTNR also includes an overarching workstream that will focus on 'multi-purpose interconnectors'.

Table 5: The four workstreams in the OTNR.¹¹²

Workstream	Connection dates	Description
1. Early Opportunities	2026-30	<p>Focuses on projects that are close to construction but do not yet have planning permission ('in-flight').</p> <p>Any coordination must primarily rely on existing legislation and regulation, as there is insufficient time to make significant changes without risking delays.</p> <p>This phase could include projects that are aiming to secure CfD contracts in Allocation Round 4 (AR4), which is due to open in December 2021. For example, there are six projects off East Anglia that either have planning permission or are awaiting a planning decision.¹¹³</p>
2. Pathway to 2030	2026-30	<p>Focuses on projects that can connect by 2030 but are early enough in the development process to accommodate changes to the design of their grid connection. The workstream is likely to rely on existing primary legislation, plus some changes to Ofgem's investment approval process and possibly small regulatory changes.</p> <p>BEIS, Ofgem and the ESO will work with others to develop a map of likely offshore wind projects and identify priority regions for coordination.</p> <p>With more certainty over where projects will be built, Ofgem may be able to approve more 'anticipatory investment' in the onshore and offshore electricity network.</p> <p>This phase could include the 3.5 GW of projects in the Irish Sea that were awarded options-to-lease in the Crown Estate's Leasing Round 4 or options-to-lease that will be awarded in Crown Estate Scotland's upcoming ScotWind leasing round.</p>

112. BEIS (December 2020). *Offshore Transmission Network Review Webinar (17th December 2020)*. [Link](#). Page 43.

113. Hornsea Project Three, Norfolk Vanguard, Norfolk Boreas, East Anglia Three, East Anglia One North and East Anglia Two.

3. Enduring regime	2030 onwards	<p>For projects connecting post-2030, the Government and Ofgem can completely redesign the development process for offshore wind farms without risking delays to projects under development.</p> <p>This will include changes to the seabed leasing process, consenting, network planning, ownership of grid connections and more.</p> <p>The workstream will require both legislative and regulatory changes. Legislative changes could be implemented through an Energy Act in 2022 or 2023.</p>
4. Multi-purpose interconnectors	2026 onwards	<p>Multi-purpose interconnectors (MPIs) combine connections for offshore wind farms with electricity interconnectors between neighbouring markets.</p> <p>MPIs could offer substantial savings and reduce onshore network infrastructure, including landing points, compared to existing approaches.</p> <p>However, there are significant commercial, regulatory and technical barriers to developing MPIs, which will need to be addressed by BEIS and Ofgem, working with counterparts in the EU and Norway.</p>

There are several other recent and ongoing programmes that are either part of the OTNR or support its wider objectives. These are summarised in the Appendix.

Next steps

Over the last year, the OTNR has analysed the potential savings from coordination, sought feedback from project developers on perceived barriers to coordination and to identify potential ‘pathfinder’ projects, and consulted with industry to inform the design of all parts of the OTNR.¹¹⁴

During summer 2021, the OTNR is expected to consult on the Early Opportunities and Pathway to 2030 workstreams. This work will be crucial for delivering the networks required to achieve the Government’s target for 40 GW of offshore wind by 2030, as set out in the Prime Minister’s 10 Point Plan.¹¹⁵

In the autumn of 2021, the OTNR is expected to consult on the Enduring Regime, which is likely to require changes to primary legislation that would be included in any Energy Bill that comes forward, possibly during 2022 or 2023.

114. BE S (March 2021). *OTNR Update (Newsletter)*. [Link](#). Pages 1 and 2.

115. BE S, 10 Downing Street (November 2020). *The ten point plan for a green industrial revolution*. [Link](#)

4. Policy recommendations

The UK's increasing ambition on offshore wind requires a revolution in the design of Great Britain's onshore and offshore electricity network. Some might argue that this revolutionary change can only be delivered through root-and-branch reform of the institutions that currently plan, own and operate Great Britain's electricity network.

However, experience shows that evolutionary changes can lead to a revolution in outcomes. For example, the evolution of the UK's subsidy regime for renewables, from Feed-in Tariffs (FiTs) to the Renewables Obligation (RO) and finally the Contracts for Difference (CfD) auctions, led to revolutionary changes in outcomes by putting competition at the heart of the Government's strategy.

Similarly, evolutionary changes to network planning could lead to the revolutionary changes in outcomes that are needed to avoid the disruption and higher costs caused by the current approach.

We have split our recommendations into short-term and long-term recommendations, recognising that there is a need for immediate action in advance of the legislative changes that are needed to deliver an enduring regime. These recommendations are grouped under four themes, each addressing one weakness of the current system.

Theme #1: Establish clear accountability for planning Great Britain's electricity networks.

Under the current system, there is no one individual or organisation in charge of the end-to-end planning process for Great Britain's electricity network. This makes it difficult for stakeholders to scrutinise decisions, including the Government, Parliamentarians, the public, and the electricity industry. We believe that these reforms can be delivered by focusing on the roles of the Government, through BEIS, the independent regulator, Ofgem, and the Electricity System Operator, National Grid ESO.

In the short term, the Government should provide more guidance to Ofgem on how to interpret its statutory duties; Ofgem's duties involve delicate trade-offs, for example between reducing costs for current versus future customers and the role that the Government wants Ofgem to play in facilitating Net Zero.

Under existing legislation, the Government can publish a *Strategy and Policy Statement (SPS)* that sets out "the Government's strategic priorities and other main considerations of its energy policy".¹¹⁶ Ofgem would be required to take the SPS into account when planning its future work programme.

The Government held a consultation on a Strategy and Policy Statement

116. DECC (Updated March 2015). *Strategy and policy statement*. [Link](#)

in 2014-2015, but never completed the consultation process or published the SPS.¹¹⁷ In the 2020 Energy White Paper, the Government committed to consult on the Strategy and Policy Statement during 2021.¹¹⁸

The Government could use the SPS to reiterate its targets for 40 GW of offshore wind by 2030; to set out its preference for a coordinated offshore network to reduce disruption to coastal and rural communities; and to set out the Government's preference to build a coordinated onshore and offshore electricity network ahead of need, including an offshore wind 'ring main'.

The guidance would help Ofgem to assess the relative importance of reducing overall costs, compared to reducing disruption for communities and the environment. These trade-offs are ultimately a political judgement; as an independent regulator, Ofgem is not well-placed to make political judgements. The SPS could also provide Ofgem with additional political cover to approve more 'anticipatory investment' in the onshore and offshore electricity network. With all investment ahead of need, there is a risk that future projects will not materialise and money will be wasted. Arguably, the risk tolerance for this type of investment is a political judgement, and hence the Secretary of State should provide guidance to Ofgem in this area.

The Strategy and Policy Statement provides an opportunity for the BEIS Secretary of State to set out his priorities through a comprehensive and accountable framework, in line with the recommendations from Policy Exchange's recent report, *Government Reimagined*.¹¹⁹

A clear vision from the BEIS Secretary of State, articulated in the Strategy and Policy Statement, could also accelerate work on the technical standards that will be needed to develop an interoperable (or 'plug and play') offshore electricity network. Any new technical standards must allow future connections to neighbouring markets through 'Multi-Purpose Interconnectors', for example in the North Sea. This vision could also act as a catalyst to develop UK supply chains and technical expertise in offshore electricity networks, including through The National HVDC Centre near Glasgow.¹²⁰

The main risk with the Strategy and Policy Statement is that Ofgem and BEIS may start trying to tackle the same problems in different and conflicting ways. For example, if Ofgem is given an explicit mandate to deliver Net Zero, then it may be encouraged to take actions that conflict with its other duties or with Government policy.

For example, Ofgem may decide that, to deliver Net Zero, certain technologies should be exempt from paying for the use of the electricity network; higher network charges in Scotland are currently a major concern for developers of Scottish onshore and offshore wind projects.^{121,122} However, any changes need to be considered in light of Ofgem's duty to protect customers by reducing costs through competitive, technology-neutral markets and by recovering costs using cost-reflective charges. Any changes may also cut across Government policy, which is sometimes technology-neutral (e.g. carbon pricing) and sometimes technology-

117. DECC (Updated March 2015). *Strategy and policy statement*. [Link](#)

118. BEIS (December 2020). *Energy White Paper: Powering our net zero future*. [Link](#), Page 86.

119. Policy Exchange (May 2021). *Government Reimagined*. [Link](#)

120. The National HVDC Centre (undated). *Our Centre*. [Link](#)

121. Scottish Renewables (February 2021). *Electricity network charging report. Reaction*. [Link](#)

122. Renewables UK (May 2021). *Charging the Wrong Way report on grid transmission charges*. [Link](#)

specific (e.g. a dedicated ‘Pot 2’ for offshore wind in the CfD auctions). The Secretary of State should ensure that his guidance is clear in this area.

Recommendation 1: The BEIS Secretary of State should use the ‘Strategy and Policy Statement’ (SPS) to issue guidance to Ofgem on the Government’s ambitions for a coordinated approach to developing Great Britain’s onshore and offshore electricity network, including an offshore wind ‘ring main’ for new offshore wind farms.

In the long term, network planning will become an increasingly important part of the electricity system. Network planning is also likely to become more controversial as its impacts grow on developers of offshore wind farms and electricity interconnectors, owners of the electricity transmission and distribution networks, local communities affected by network upgrades, and the flexibility providers that provide alternatives to new power lines, for example through smart charging for electric vehicles.

In this context, it is clear that network planning must be delivered by a body that is both independent and seen to be independent (i.e. no perceived or actual conflicts of interest). Today, responsibility for network planning is split between the Transmission Owners and the Electricity System Operator, National Grid ESO, a legally separate business within the National Grid group of companies.¹²³

The legal separation of the ESO provides assurances over its independence; however, the ESO remains part of a wider group that owns the high-voltage electricity network in England and Wales, develops and owns the majority of the UK’s electricity interconnector projects, and has agreed to acquire one of Great’s Britain’s regional Distribution Network Operators.¹²⁴

To address concerns over conflicts of interest, many governments and regulators have established an ‘Independent System Operator’ to plan and operate their electricity systems. Examples in the United States include those in New England (ISO-NE),¹²⁵ New York (NY-ISO),¹²⁶ California (CAISO),¹²⁷ Texas (ERCOT),¹²⁸ and the Midcontinent ISO (MISO).¹²⁹

Many of these organisations have the type of enhanced planning roles that Ofgem’s recent review suggested would be beneficial in Great Britain.¹³⁰ Ofgem’s review also highlighted potential conflicts of interest in three areas: asset ownership; aligning the interests of the ESO’s shareholders with those of billpayers; and separate frameworks for operating Great Britain’s electricity and gas systems. As part of the Energy White Paper, BEIS committed to “review the right long-term role and organisational structure for the ESO” through a consultation in 2021.¹³¹

We recommend that the Government establishes a new ‘Independent System Operator for Great Britain’ (ISO-GB), which would take on the current operational and planning duties of National Grid ESO, plus additional responsibility for planning Great Britain’s onshore and offshore electricity network; for example, there should be a new obligation on the ESO to coordinate development.

123.National Grid ESO (undated). *Who we are*. [Link](#)

124.Current News (March 2021). *National Grid to acquire WPD as it shifts from gas to a more electrified asset base*. [Link](#)

125. SO New England (undated). *About us*. [Link](#)

126.New York SO (undated). *What we do*. [Link](#)

127.California SO (undated). *About us*. [Link](#)

128.ERCOT (undated). *Twitter feed*. [Link](#). Website not accessible outside the United States.

129.MISO Energy (undated). *About MISO*. [Link](#)

130.Ofgem (January 2021). *Review of GB system operation*. [Link](#)

131.BEIS (December 2020). *Energy White Paper: Powering our net zero future*. [Link](#). Pages 85 and 86.

Over time, the role of ISO-GB should be expanded to include the elements of the gas system, new energy vectors such as hydrogen and carbon capture and storage, and enhanced responsibility for electric vehicle charging.¹³² The Government and Ofgem should also consider giving ISO-GB responsibility for the planning and operation of Great Britain's electricity distribution networks, a function that currently sits within the Distribution Network Operators (DNOs); this could be delivered by establishing regional Distribution System Operators (DSOs) as subsidiaries of ISO-GB.

The BEIS Secretary of State should issue guidance to ISO-GB, through a mechanism similar to the Strategy and Policy Statement. We believe that this strikes the right balance between Ministerial accountability and the independence of the existing ESO, which has generally served billpayers well.

Recommendation 2: The Government should establish a new 'Independent System Operator for Great Britain' ('ISO-GB'), modelled on examples in the United States and beyond. ISO-GB should have overall responsibility for planning the GB transmission network, including the responsibility to develop a coordinated onshore network.

Theme #2: Minimise disruption faced by communities and introduce compensation.

Large-scale energy projects provide national benefits but can have negative local impacts.¹³³ In some cases, these local impacts can be avoided, for example through placing more of the required electricity network offshore. In other cases, impacts can be reduced, for example by running the electricity cables for multiple wind farms through a single trench. Finally, impacts can be mitigated, for example through enhanced tree planting to screen new onshore substations.

The current system of network planning does not fully account for the disruption faced by local communities during both construction and operations. The current system does partially account for negative impacts through planning regulations and a preference for offshore wind farms to use underground cables rather than overhead lines. This system has had some positive results, including encouraging the proposed Norfolk Boreas and Norfolk Vanguard offshore wind farms to share a single cable route, reducing the impact onshore.¹³⁴ The current system also encourages developers to minimise disruption by using techniques like Horizontal Directional Drilling to cross under roads and railways without having to close them.¹³⁵ However, it is clear that more can be done to reduce the impact of new infrastructure on coastal and rural communities, for example by developing a coordinated offshore electricity network.

In the short term, it will be extremely challenging to implement coordination for projects that have secured planning permission or have submitted planning applications; these projects may have been under development for over a decade and will have completed expensive and

132. On the gas system, Ofgem's review of GB system operation noted that it is more difficult to separate the operation of the gas system from its ownership, in part due to safety concerns. [Link](#), Page 96-97.

133. Offshore wind farms do of course bring a number of local benefits, including the potential for employment in manufacturing, construction and operation of the wind farm.

134. Vattenfall (Autumn 2018). *Consultation Summary Document: Norfolk Boreas Offshore Wind Farm*. [Link](#)

135. See Vattenfall (June 2019). *Norfolk Boreas offshore Wind Farm: Environmental Statement (Chapter 4)*. [Link](#)

time-consuming environmental studies. Coordinated approaches may also require using different technologies, for example High Voltage Direct Current (HVDC) rather than Alternating Current (AC) subsea cables, which is an additional barrier to coordination in the short-term. Any coordinated solution is likely to require additional surveys and planning consents, which could lead to lengthy delays.

The OTNR's *Early Opportunities* workstream focuses on these 'in-flight' projects and has invited expressions of interest from project developers to participate in 'pathfinder' projects. This offer is only likely to be attractive to developers if the Government does the following:

1. Underwrites all additional costs incurred by the developers, including the cost of any delays to their projects such as lost CfD payments.
2. Allows developers to continue developing their existing proposals for their own grid connection in case the coordinated option does not materialise.

Given the potentially large costs involved in encouraging projects to coordinate, we recommend that the Government focuses only on the projects where early coordination could have the biggest benefits; the Government should focus on the East Anglia region, where there are six new offshore wind farms that are looking to connect to the onshore electricity network in the mid-2020s and where proposals include new substations and many miles of underground cables onshore.¹³⁶

If the Government cannot convince projects to coordinate, or if it proves too expensive, then the Government should take the following steps for projects commissioning in the mid-2020s:

1. **Reduce** the impact on local residents by encouraging projects to align their construction timelines; for example, ensuring that road closures are coordinated so that key routes are not blocked for long periods. This could also include paying developers to build temporary tracks for construction traffic to avoid pinch points on rural roads and in small towns and villages.
2. **Mitigate** the impact of new infrastructure, for example through enhanced tree planting to screen new substations or accelerated remediation of construction sites.
3. **Compensate** local residents, either directly or through community payments that benefit local assets such as village halls and sports clubs (see Recommendation 4 and Recommendation 6).

¹³⁶Hornsea Project Three, Norfolk Vanguard, Norfolk Boreas, East Anglia Three, East Anglia One North and East Anglia Two.

Recommendation 3: The Government should continue to develop an ‘opt-in’ mechanism to coordinate late-stage offshore wind projects, focusing on the East Anglia region. For projects that agree to coordinate, the Government should underwrite developers’ costs. The Government should also take steps to reduce the impact of construction, mitigate visual impacts and compensate local residents.

In some cases, it will not be possible to avoid or reduce the impacts of new electricity networks. In these cases, communities should be compensated for hosting nationally-significant infrastructure. The UK Government has already accepted this principle as part of the planned Shale Wealth Fund, which would have distributed a share of tax revenues from shale development to local communities.^{137,138}

In the short term, the Government should pay this compensation rather than developers of offshore wind farms, as it would be unreasonable to levy a charge on offshore wind projects that have already secured a support contract with the Government as part of the Contracts for Difference auction.¹³⁹ In the longer-term, this compensation should take the form of ‘Offshore Wind Wealth Funds’ (see recommendation 6).

Recommendation 4: Where the impact of new offshore wind farms cannot be reduced, for example because projects have already secured planning permission, the Government should compensate communities impacted by the construction of offshore wind farms and associated infrastructure such as substations and cable routes.

For future projects, the Government should also ensure that negative impacts are fully accounted for by developers, the Transmission Owners, Ofgem and the ESO. Once these impacts are considered, coordinated solutions will be viewed more favourably in the network planning process.

We recommend that BEIS produces new guidance that would help Ofgem and the ESO to assess the negative impact of different connections options for offshore wind farms; this assessment should consider impacts on the environment, visual amenity and disruption to local residents, for example disruption caused by construction traffic. This assessment should be conducted at the national level, with the aim of reducing the burden of new infrastructure on the environment and local communities.

Recommendation 5: BEIS should produce new guidance that would help Ofgem and the ESO to assess the negative impact of different connection options for offshore wind farms. This guidance will provide clear direction to project developers, the Transmission Owners, Ofgem and the ESO on the value of minimising disruption to the environment and affected communities.

In the long term, the Government should establish ‘Offshore Wind Wealth Funds’ that make payments to local communities affected by offshore wind farms and associated onshore infrastructure. Many developers have already established voluntary ‘Community Benefit Funds’; for example, the 659 MW Walney Extension project in the Irish Sea pays £600,000 per

137.HM Treasury (Updated November 2017). *Shale Wealth Fund: response to the consultation.* [Link](#)

138.The moratorium on fracking in England means that the Shale Wealth Fund was never implemented.

139. If the Government does want to put a levy on existing wind farms, then it should increase the CfD ‘Strike Price’ by the same amount so that investors are no worse off.

year to community projects (around £1,000 per MW per year).¹⁴⁰

As Policy Exchange recommended in a recent report, *The Future of the North Sea*, the Government should make community benefits mandatory for all new offshore wind farms that participate in the Government's Contracts for Difference auctions; these community benefit funds should be called 'Offshore Wind Wealth Funds', echoing the Government's previous plans for 'Shale Wealth Funds'. We recommend that the minimum community benefit is set at £0.50 per MWh;¹⁴¹ this would raise around £2,000,000 per year for a typical 1 GW offshore wind farm (£2,000 per MW per year).¹⁴²

This proposed levy on offshore wind farms (£0.50 per MWh or approximately £2,000 per MW per year) is significantly less than the Government's recommendations for onshore wind Community Benefit Funds (£5,000 per MW per year); this reflects the reduced visual impact and disruption of an offshore wind farm compared to an equivalent onshore wind farm.

Additionally, the Government could consider new conditions in the planning regime (Development Consent Orders) that would require project developers to compensate affected communities, using BEIS' guidance on how to assess the negative impact on local communities (see Recommendation 5). The Government could also impose new obligations on developers to coordinate, for example through changes to the National Policy Statements (NPS).¹⁴³

Recommendation 6: The Government should establish mandatory 'Offshore Wind Wealth Funds' for new offshore wind farms, as a condition of receiving support in future Contracts for Difference auctions. Offshore wind farms should pay a minimum community benefit of £0.50 per MWh (approximately £2m per year for a 1 GW offshore wind farm).

Theme #3: Establish a long-term plan to deliver a Net Zero electricity network by 2050.

The UK's Net Zero target requires long-term planning. However, under current policy, Great Britain's electricity network is only planned up to ten years ahead of time. In the old electricity system this made sense, as only small, incremental network upgrades were required to accommodate relatively slow changes in generation and demand patterns.

Today, the electricity system is changing rapidly, as coal-fired power stations close and new wind and solar projects are built across the UK; this new electricity system demands a longer-term approach, which considers the needs of both current and future projects. The network upgrades that are built today could operate for fifty years or more, so it may make economic sense to build assets now that will only be needed in five- or ten-years' time, when the Government's ambitious targets for Carbon Budget 5 and Carbon Budget 6 start to bite.

In the short term, the BEIS Secretary of State and Ofgem should jointly

140. Wainwright Extension (Orsted) (undated). *About the project*. [Link](#)

141. The community benefit should be per MWh of output rather than per MW of capacity because the CfD payments are per MWh. This reduces risks for project developers as the community benefit payment is 'back-to-back' with the terms of the CfD contract.

142. Assuming an average load factor of 50%. Annual payments for a 1 GW offshore wind farm = 1,000 MW * (50% * 8,760 hours/year) * (£0.50/MWh) = £2.19m per year.

143. DECC (June 2011). *National Policy Statements for energy infrastructure*. [Link](#)

request the ESO to produce a long-term plan for Great Britain's electricity network out to 2050, under a range of scenarios. The plan would help to identify high-priority projects, and to explain to the public why certain new infrastructure is required. Today it can feel like infrastructure is planned in a haphazard and suboptimal manner, which is hard to justify to affected communities.

This 30-year plan would build on the ESO's *Offshore Coordination Project*, which explored for the first time the likely impact of the UK's Net Zero target on the electricity network, and ongoing work by The Crown Estate to assess where new offshore wind farms will be built.^{144,145}

A long-term plan will also help to ensure that infrastructure built now does not conflict with infrastructure that will be needed post-2030. For example, one option in the ESO's analysis suggests connecting wind farms off North Wales to the onshore network in South Wales, via a subsea electricity cable around the west coast (Table 3). Whilst this may be an optimal solution in the medium term, scenarios in the 30-year plan could assess whether this would hinder the development of floating offshore wind in the Celtic Sea off South Wales, which may be cost competitive in the long term.

To implement these changes, the ESO should increase the horizon of its various plans from ten years to thirty years. This includes the Electricity Ten Year Statement (ETYS), the Network Options Assessment (NOA), and the System Operability Framework (SOF); the ESO should also reform these processes to put more focus on a wider assessment of the environmental and social impacts of its proposals. Each of these documents is linked to the ESO's Future Energy Scenarios (FES), which also need reform.

A long-term plan would allow Ofgem and the new ISO-GB to take new approaches to the development of a coordinated onshore and offshore electricity network. For example, upgrades could be structured as a number of phased work packages to build out the network, similar to how 'Renewable Energy Zones' (REZs) have been linked to infrastructure development in markets like Texas.¹⁴⁶ The grid connections for the Renewables Energy Zones could be built by the incumbent Transmission Owners, developers of offshore wind farms, or allocated through competition – potentially using the existing 'OFTO' regime.

Over time it may be possible to merge the regulatory regimes and for the onshore and offshore electricity network, for example through a single competition framework. In the Energy White Paper 2020, the Government committed to legislate to allow competitive tendering for onshore networks, possibly through a 'Competitively Allocated Transmission Owner' (CATO) regime, which could act a precursor to a coordinated regulatory regime for the onshore and offshore network.¹⁴⁷

144. National Grid ESO (undated). *Offshore Integration Project*. [Link](#)

145. The Crown Estate (December 2020). *New partnerships to unlock offshore energy ambitions and protect the nation's marine environment*. [Link](#). See *East Coast Grid Spatial Study and Future Offshore Wind Scenarios project*.

146. NREL (May 2016). *Renewable Energy Zones: Delivering clean power to meet demand*. [Link](#)

147. Ofgem (November 2016). *Quick Guide to the CATO Regime – November 2016*. [Link](#)

The Future Energy Scenarios (FES) should be complemented by new, bottom-up approaches.

The Future Energy Scenarios provide comprehensive analysis of how Great Britain’s energy system could evolve between now and 2050, depending on various pathways for technological progress, societal preferences and Government ambition on decarbonisation. The FES aims to model the entire energy system, including future deployment of electric vehicles and electric heating systems, adoption of rooftop solar, and deployment of new technologies like low-carbon hydrogen and carbon capture and storage.

This type of modelling is valuable to understand the high-level drivers of the future energy system. However, the wide scope of these scenarios means that they are not well-suited to answer the highly-granular, highly-locational questions that network planners need to answer.

The FES methodology assumes there are “no internal constraints on the GB network”,¹⁴⁸ yet the Network Options Assessment uses outputs from the FES to assess which new network investments are required.¹⁴⁹ It is not completely clear how the modelling in the FES is translated to the detailed modelling in the rest of the network planning process, or whether modelling for the FES takes into account the powerful feedback effect between where networks are built and where project developers choose to build and connect their projects.¹⁵⁰

We recommend that the FES is complemented by a new set of scenarios that focus more on where projects will be built, and how they might connect to the electricity network; these scenarios should include less detail on the rest of the energy system. These scenarios should also consider constraints on marine space and environmental constraints, which the OTNR will consider as part of the Enduring Regime workstream. The OTNR is already adopting bottom-up approaches by seeking to “develop a map of upcoming generation to early 2030s”; this bottom-up ‘generation map’ will provide a useful complement to the largely top-down Future Energy Scenarios.

The Government, Ofgem and the ESO also need to grapple with how they should use scenarios that do not meet the Government’s legally-binding commitment to achieve Net Zero emissions by 2050. In the 2015 Future Energy Scenarios, only one of the four planning scenarios met the Government’s legally-binding target for an 80% reduction in carbon emissions by 2050.¹⁵¹ In the 2020 Future Energy Scenarios, three of the four planning scenarios met the Government’s updated legally-binding target for Net Zero emissions by 2050, but one did not.¹⁵² Given the importance of the most extreme scenarios in the network planning process (see Recommendation 8), the parties should review whether these scenarios should be given a lower weighting or considered separately.

148. National Grid ESO (revised June 2021). *FES Modelling Methods 2020*. [Link](#). Page 16.

149. National Grid ESO (undated). *ETYS 2020: Network Development Inputs*. [Link](#). Card 1 (Future Energy Scenarios).

150. If new power lines are built, then these locations are immediately more attractive to developers of future projects.

151. National Grid ESO (July 2015). *Future Energy Scenarios (2015)*. [Link](#). Page 5.

152. National Grid ESO (July 2020). *Future Energy Scenarios (2020)*. [Link](#). Page 6.

Recommendation 7: The BEIS Secretary of State and Ofgem should jointly request the ESO to produce a long-term plan for Great Britain’s electricity network out to 2050, under a range of scenarios. These scenarios should be bottom up and should complement the ESO’s existing Future Energy Scenarios (FES).

A further barrier to long-term planning is the methodology that Ofgem, the Transmission Owners and the ESO use to assess new network projects, known as ‘least-worst regrets’. This methodology is used in conjunction with the Future Energy Scenarios to assess which new network projects should be built. One downside of the least-worst regrets methodology is that the outcomes are dominated by the most extreme scenarios, which may delay the approval of new power lines that are needed for Net Zero.¹⁵³

For example, a new power line may be required in the three FES scenarios that meet the Government’s legally-binding Net Zero target but not in the one that does not. Under the current methodology, this project may be rejected because it would lead to high “regret” in the higher-emission scenario.

The Network Options Assessment (NOA) process does include additional checks to ensure that the recommendations are robust, including applying additional scrutiny to recommendations driven by a single scenario. However, in an independent report commissioned by Ofgem, a group of academics recently recommended that Ofgem treats higher-emission scenarios as “non-core”.¹⁵⁴

Other approaches are available, including standard probability-based scenarios that assign probabilities to individual scenarios. One reason why these approaches are not currently used is that it is difficult to apply probabilities to the wide range of possible outcomes for the future energy system. The bottom-up approaches recommended above will help (Recommendation 6). We recommend that Ofgem reviews the use of the ‘least-worst regrets’ methodology in network planning to ensure that it is fit for purpose to deliver a coordinated onshore and offshore grid, and to ensure that it is consistent with delivering Net Zero at least cost.

The ESO has trialed a new methodology, ‘least-worst weighted regrets’ (LWWR), which aims to guard against outcomes dominated by extreme scenarios.¹⁵⁵ This is a positive step, which Ofgem and the ESO should build on when reviewing the existing methodology.

Recommendation 8: Ofgem should review the main network planning methodology (‘least-worst regrets’) to ensure that it is fit for purpose to deliver a coordinated onshore and offshore electricity network and Net Zero. Ofgem should also work with the ESO to develop new approaches to assess which network projects should have the highest priority.

In the long term, there will be increasing pressure on the use of UK’s seas, with more conflicts between low-carbon energy projects like offshore

153. NERA Economic Consulting (December 2016). *Methods for Planning Under Uncertainty* (Cambridge EPRG Winter Conference). [Link](#)

154. Ofgem (December 2020). *Decision making for future energy systems*. [Link](#). [Page 3](#)

155. Ofgem (December 2020). *Approval of the 2020 Network Options Assessment methodology (letter)*. [Link](#)

wind, low-carbon hydrogen and carbon capture, and traditional activities like fishing, shipping, and military radar. Additional pressure will come from the Government's ambition to increase the size and scope of the UK's Marine Protected Areas (MPAs).¹⁵⁶

Without more coordination, there will be more conflicts between users of the UK's seas, which may limit the potential of the UK's seas to contribute to Government's aims on the economy, the environment, and Net Zero. These issues are explored in more detail in Policy Exchange's recent report, *The Future of the North Sea*.¹⁵⁷

To address these issues, we recommend that the Government establishes a new 'UK Seas Authority' to coordinate the development of the UK's seas. This new Authority would build on existing work by the Marine Management Organisation (MMO), which is responsible for marine planning in England, and its equivalents in the Devolved Nations.

The new UK Seas Authority would also help to establish clear accountability for the planning of the UK's marine space. Today, the MMO is responsible for marine planning, but other organisations like The Crown Estate, Crown Estate Scotland and the Oil and Gas Authority also play a major role in deciding what projects are built where. As with Ofgem and the new ISO-GB, the BEIS Secretary of State should provide guidance to the UK Seas Authority through a policy statement, which should include a clear explanation of which body is responsible for each element of the marine planning process.

Recommendation 9: The Government should establish a new 'UK Seas Authority' to coordinate the development of the UK's seas across all users, including offshore wind, fishing, shipping, environmental protection and more.

Theme #4: Encourage developers to build and connect projects where they will reduce electricity bills the most.

In the long term, the Government must embed coordination in every stage of the development process for offshore wind farms, including seabed leasing, windfarm design, offshore wind auctions (CfDs), consenting (planning permission) and construction. The previous recommendations in this report would help this process by increasing accountability, fully accounting for disruption to local communities, and creating a long-term plan for Great Britain's electricity network. However, the Government and Ofgem must not ignore the potential for market signals to ensure that projects are built and connected in the places where they have the most value.

Today, grid connections for offshore wind farms are primarily designed to reduce the cost of the grid connection itself, with only relatively minor consideration given to the impact on the wider electricity network.

For example, offshore wind farms off Scotland and East Anglia are planning to connect to nearby substations on the onshore electricity network. This minimises the cost of the grid connection but is expected

156.Gov.UK (undated). *Global Ocean Alliance: 30by30 initiative*. [Link](#)

157.Po icy Exchange (November 2020). *The Future of the North Sea*. [Link](#)

trigger upgrades to the onshore network that will be needed to transmit electricity to customers in urban and industrial areas. In Scotland, planned upgrades include four subsea electricity cables connecting to various places on the east coast of England.¹⁵⁸ In East Anglia, planned upgrades include new onshore power lines to transmit electricity to customers in London.¹⁵⁹ Some of these upgrades could undoubtedly have been avoided if offshore wind farm developers had a stronger incentive to connect their projects closer to customers.

The existing transmission charging regime (TNUoS) does provide incentives for developers to build and connect projects closer to customers; however, as discussed earlier in this report, we believe that the weaknesses of the current TNUoS regime will be difficult to address. Alongside trying to improve the TNUoS regime, we recommend that the Government and Ofgem reform Great Britain's wholesale electricity market.

Under current market rules, generators receive the same price for electricity across the whole of Great Britain, regardless of whether the electricity can actually be transmitted to customers; this system is known as 'national pricing'. Other pricing systems are possible, including 'local electricity pricing'.¹⁶⁰ With local pricing, prices rise in areas with low supply and high demand, and fall in areas with high supply and low demand.

This would lead to lower prices in areas with lots of wind farms, such as Scotland, whereas urban areas like London would see higher prices; note that these locational prices do not necessarily need to be passed on to residential customers. For more discussion of this issue, please see Policy Exchange's recent report, *Powering Net Zero*.¹⁶¹

With local pricing, offshore wind farms would be encouraged to seek a grid connection closer to customers, where prices are higher. As an added benefit, new sources of industrial electricity demand would be encouraged to locate near to the UK's cheap and abundant offshore wind resources. For example, lower prices could benefit car manufacturers in Sunderland and encourage new green hydrogen production in Grangemouth, green steel production on Teesside, and new data centres on Humberside.

As part of Policy Exchange's recent report, *Powering Net Zero*, modelling by Aurora Energy Research found that regional or local pricing could save customers £2bn per year by encouraging more coordination between supply and demand.¹⁶² Local pricing is already used in many US States, New Zealand and Singapore.

Some may have concerns that a more coordinated approach to network planning will give less choice to developers over where they build and connect their projects, thus undermining the rationale for local electricity pricing. Even if this were true, local pricing would still send strong signals to energy storage facilities, green hydrogen producers, and possibly electric vehicle owners on when to use more electricity, providing significant benefits to the electricity system. In addition, we believe that local pricing would encourage developers of offshore wind farms to work with the new ISO-GB to plan wind farms and the onshore and offshore electricity

158. National Grid ESO (January 2021). *Network Options Assessment (NOA) 2021*. [Link. See Page 61, options E2DC, E4D3, E4L5 and TGDC.](#)

159. National Grid ESO (January 2021). *Network Options Assessment (NOA) 2021*. [Link. See Page 56, options AENC, ATNC, BTNO, SCD1, and TENC.](#)

160. As known as nodal pricing.

161. Policy Exchange (December 2020). *Powering Net Zero*. [Link](#)

162. Policy Exchange (December 2020). *Powering Net Zero*. [Link](#)

network to more easily transmit electricity to urban and industrial areas. In Texas, a coordinated network (Renewable Energy Zones) has been developed in a market with local electricity pricing.¹⁶³

Recommendation 10: To encourage project developers to build offshore wind farms in places where they will reduce energy bills the most, the Government should implement local electricity pricing in Great Britain’s wholesale electricity market. This will encourage project developers to build and connect projects closer to customers.

Summary of policy recommendations

Table 6: Policy recommendations to deliver a coordinated onshore and offshore electricity network.

Theme	Time-frame	Recommendation
Establish clear accountability for network planning	Short term	#1: The BEIS Secretary of State should use the ‘Strategy and Policy Statement to issue guidance to Ofgem on the Government’s ambitions for a coordinated approach to developing Great Britain’s onshore and offshore electricity network, including an offshore wind ‘ring main’ for new offshore wind farms.
	Long term	#2: The Government should establish a new ‘Independent System Operator for Great Britain’ (‘ISO-GB’), modelled on examples in the United States and beyond. ISO-GB should have overall responsibility for planning the GB transmission network, including the responsibility to develop a coordinated onshore and offshore network.
Minimise disruption and compensate communities	Short term	#3: The Government should continue to develop an ‘opt-in’ mechanism to coordinate late-stage offshore wind projects, focusing on the East Anglia region. This coordination could include sharing underground cable routes or coordinating construction timelines.
	Short term	#4: Where the impact of new offshore wind farms cannot be reduced, for example because projects have already secured planning permission, the Government should compensate communities impacted by the construction of offshore wind farms and associated infrastructure such as substations and cable routes.
	Short term	#5: BEIS should produce new guidance that would help Ofgem and the ESO to assess the negative impact of different connection options for offshore wind farms. This assessment should be conducted at the national level, with the aim of reducing the burden of new infrastructure on the environment and local communities.
	Long term	#6: The Government should establish mandatory ‘Offshore Wind Wealth Funds’ for new offshore wind farms, as a condition of receiving support in future Contracts for Difference auctions. Offshore wind farms should pay a minimum community benefit of £0.50 per MWh (approximately £2m per year for a 1 GW offshore wind farm).

163.NREL (May 2016). *Renewable Energy Zones: Delivering clean power to meet demand.* [Link](#)

Establish a long-term plan to deliver a Net Zero electricity network by 2050.	Short term	#7: The BEIS Secretary of State and Ofgem should jointly request the ESO to produce a long-term plan for Great Britain's electricity network out to 2050, under a range of scenarios, to guide network planning decisions moving forward.
	Short term	#8: Ofgem should review the main network planning methodology ('least-worst regrets') to ensure that it is fit for purpose for a coordinated onshore and offshore electricity network and Net Zero. Ofgem should also work with the ESO to develop new approaches to assess which network projects should have the highest priority.
	Long term	#9: The Government should establish a new 'UK Seas Authority' to coordinate the development of the UK's seas across all users, including offshore wind, fishing, shipping, environmental protection and more.
Encourage developers to build and connect projects in places where they will reduce energy bills the most.	Long term	#10: To ensure that offshore wind farms are built in places where they will reduce energy bills the most, the Government should implement local electricity pricing in Great Britain's wholesale electricity market. This will encourage project developers to build and connect projects closer to customers.

5. Conclusion

The Government's target to install 40 gigawatts (GW) of offshore wind by 2030 requires a step change in the development of Great Britain's onshore and offshore electricity networks. Without reform, there is now a significant risk that local backlash against grid connections for offshore wind farms will grow, spreading from East Anglia to North Wales, Humberside, and the east coast of Scotland.

With the right reforms, the Government can ensure that offshore wind maintains the strongest possible support across the UK, recognising that compensation should be forthcoming for those local communities that will be inevitably impact by new infrastructure, even under a coordinated approach.

As the offshore wind rollout continues, there will be plenty of opportunities for British businesses to participate, whether manufacturing of wind turbines and subsea cables, constructing and operating wind farms, or developing the new technologies that will unlock an offshore electricity grid in the North Sea. Therefore, alongside the reforms proposed in this report, the Government should ensure that British businesses have the right opportunities to win contracts, grow green jobs and expand the export potential of the UK's world-leading offshore wind industry.

Appendix: Other ongoing reviews

The following reviews are relevant to the Offshore Transmission Network Review (OTNR) and related issues raised in this report. Please note that this list is not exhaustive.

Review	Organisation	Description
Decarbonisation Action Plan. ¹⁶⁴	Ofgem	In February 2020, Ofgem published an action plan for an 18-month programme of work. The action plan includes work on cost-effective network for Net Zero and on 'anticipatory investment.
Interconnector Policy Review. ¹⁶⁵	Ofgem	In August 2020, Ofgem announced a review of its policies on interconnectors, including a review of the 'cap and floor' regime that supports investment in new interconnectors, and a workstream on Multi-Purpose Interconnectors that is highly relevant to the OTNR.
Review of GB system operation. ¹⁶⁶	Ofgem	In January 2021, Ofgem published a review of GB system operation. In this review, Ofgem recommended that the Electricity System Operator is given full independence from the National Grid group.
Review of GB system operation. ¹⁶⁷	BEIS	In the Energy White Paper 2020, the Government committed to consult during 2021 on the 'institutional arrangements governing the energy system, including system operation.
Offshore Coordination Project. ¹⁶⁸	National Grid ESO	In Spring 2020, National Grid ESO started a project on offshore coordination. The first phase analysed illustrative scenarios for Great Britain's electricity network in 2050 under current policies compared to a coordinated approach for connecting offshore wind farms. Phase 2 of this project is being delivered in conjunction with the OTNR.

164. Ofgem (February 2020). *Ofgem's Decarbonisation Action Plan*. [.ink](#)

165. Ofgem (August 2020). *Open letter: Notification to interested stakeholders of our interconnector policy review*. [.ink](#)

166. Ofgem (January 2021). *Review of GB energy system operation*. [.ink](#)

167. BEIS (December 2020). *Energy White Paper*. [Link](#). Page 85.

168. National Grid ESO (undated). *Offshore Coordination Project*. [.ink](#)

<p>Early Competition Plan.¹⁶⁹</p>	<p>National Grid ESO</p>	<p>In April 2021, National Grid ESO published a plan to introduce competition for onshore networks. This plan is subject to the Government passing new legislation, which BEIS committed to as part of the Energy White Paper, published in December 2020.</p>
<p>Offshore Wind Evidence and Change Programme.¹⁷⁰</p>	<p>Crown Estate, BEIS, DEFRA</p>	<p>In December 2020, The Crown Estate established a new programme to facilitate increase offshore wind capacity alongside environmental goals. DEFRA and BEIS are project partners. Early outputs from the project include:</p> <ul style="list-style-type: none"> - East Coast Spatial Grid Study (with Aecom).¹⁷¹ - Future Offshore Wind Scenarios (with Arup).¹⁷²
<p>Windfarm Mitigation for UK Air Defence.¹⁷³</p>	<p>BEIS, MoD</p>	<p>Offshore wind farms can conflict with radar signals, including those used by the UK's Ministry of Defence. This competition will fund innovative solutions that could allow future offshore wind farms to coexist alongside the UK's radar systems for air defence.</p>
<p>The National HVDC Centre.¹⁷⁴</p>	<p>Part of SSE Networks</p>	<p>Opened in 2017, the National HVDC Centre conducts research and tests High Voltage Direct Current (HVDC) electrical systems, for example those used to connect offshore wind farms to the onshore electricity network. In 2020, Ofgem approved funding for the National HVDC Centre for the period 2021-26.¹⁷⁵</p>
<p>Ministerial Delivery Group for renewable energy projects.¹⁷⁶</p>	<p>BEIS, DEFRA, MoD, HMT, MHCLG.</p>	<p>In the Energy White Paper 2020, the Government committed to establish a 'Ministerial Delivery Group' for renewable energy projects. This group includes Ministers from BEIS, DEFRA, Ministry of Defence, HM Treasury and MHCLG.</p> <p>This cross-Departmental working group aims to deliver a step change in coordination between Departments to remove barriers to new large-scale renewable energy projects such as offshore wind farms.</p>

169. National Grid ESO (April 2021). *Early Competition Plan*. [Link](#)

170. The Crown Estate (undated). *Offshore Wind Evidence + Change Programme*. [Link](#)

171. Aecom for Crown Estate (April 2021). *East Coast Grid Spatial Study*. [Link](#)

172. *RE News* (February 2021). *Arup to scope future UK offshore wind scenarios*. [Link](#)

173. Defence and Security Accelerator (UK Government) (Updated June 2021). *Windfarm Mitigation for UK Air Defence Phase 2: Competition Document*. [Link](#)

174. The National HVDC Centre. (undated). *Our centre*. [Link](#)

175. Ofgem (July 2020). *Decision on the future of the HVDC centre following the end of NIC-funding period*. [Link](#)

176. BEIS (December 2020). *Energy White Paper*. [Link](#). Page 47.



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SEAS Analysis of Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021¹

1. INTRODUCTION

“Without reform, there is now a significant risk that local backlash against grid connections for offshore wind farm will grow, spreading from East Anglia to North Wales, Humberside, and the east coast of Scotland”²

1.1 This is the conclusion to the latest report endorsed by the Rt Hon Dame Andrea Leadsom DBE MP and the Rt Hon Amber Rudd.

1.2 SEAS would agree with this conclusion. The Government must minimise the damage to precious inland areas and listen to communities if they are to maintain the support for the UK’s ambitious 2030 offshore wind energy goals.

1.3 SEAS and other community groups are proposing a positive way forward, a ‘split decision’, for East Anglia One North (EA1N) and East Anglia Two (EA2), so that:

- a. The offshore turbines are recommended for consent. This will mean that no time is wasted in respect of construction of the turbines.
- 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 industrialised site.

2. THE CURRENT REGIME IS NOT FIT FOR PURPOSE

“[There is] concern that the current regime, which sees each offshore wind farm build its own new power lines and substations to connect to the existing electricity network, is not fit for purpose.”³

¹ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

² Ibid

³ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)



2.1 This report is the latest in a string of policy papers which discredits the current 'point to point' system for connecting wind farms to the grid. It supports the findings of the National Grid ESO study⁴ which states that the current rules would lead to unacceptable outcomes, including:

- a. Significant disruption for coastal and rural communities caused by the new network infrastructure required for each offshore wind farm;
- b. Risk of environmental degradation in environmentally sensitive areas offshore, onshore and at landing points for subsea cables; and
- c. Higher costs and therefore higher energy bills compared to a coordinated onshore and offshore electricity network.

2.2 The devastating impacts of EA1N and EA2 on the onshore tourism economy, the environment and local communities have been well documented throughout the nine month examination demonstrating the now established fact that the current regime is not fit for purpose.

3. WE NEED A CLEAR VISION FOR THE FUTURE NOW

“More coordination will not come about just by leaving it to the market. It requires Ministers to outline a clear vision for the future of the UK’s onshore and offshore electricity network.”⁵

“Some of this network infrastructure could have a lifetime of over fifty years. It is therefore critical that network planners consider the long-term impact of infrastructure that is approved and/or built in the next few years. For example, without long-term planning, network infrastructure built to meet the 2030 offshore wind target (40 GW) may make it more expensive to meet the UK’s longer term decarbonisation goals, which the ESO forecasts will require 80-100 GW of offshore wind.”⁶

“Projects recommended now must be complementary to options that might be recommended in 3, 5 or 10 years time.”⁷

⁴ The Offshore Co-ordination Phase 1 Final Report, National Grid Electricity System Operator (NGESO), 16 December 2020 [Link](#)

⁵ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

⁶ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

⁷ Ibid



3.1 There is an urgent need for a comprehensive long-term offshore and onshore spatial plan so that projects connecting over the near, medium and long term benefit from pre-planned coordination. Importantly, we need this holistic plan now, not in two, five or ten years time.

3.2 SEAS believe that this point must be reflected upon with regard to EA1N and EA2 planning applications. The cumulative impact of future projects planned to connect to the Grid at Friston should consent be given is staggering (Nautilus Interconnector, Eurolink Interconnector, SCD1 Interconnector, SCD2 Interconnector and possibly Five Estuaries Offshore Wind Farm and North Falls Wind Farm). With the addition of Sizewell C Nuclear Power Station, this will become the largest complex of energy infrastructure in the UK. It is essential that EA1N and EA2 are planned strategically in co-ordination with the future projects planned to connect to the grid in East Anglia. To date, this has not been the case. The Examination of EA1N and EA2 took place without due consideration to future projects.

3.3 The 'split decision', where the offshore turbines are given consent but the onshore infrastructure is not, would give the government an opportunity to develop a planned strategic direction for East Anglia.

- a. An opportunity to choose a Grid connection on a brownfield or industrialised site which has the long-term capacity to act as a wind energy hub and thus facilitate the timely consenting not only of EA1N and EA2 but future projects planned to connect in the area. Thus avoiding the costly and lengthy Judicial Review process as has been experienced in Norfolk.
- b. An opportunity to give new strategic direction to the UK's offshore wind industry and pilot an East Anglian 'Pathfinder' project with integrated offshore solutions in order to minimise the number of connections onshore and thereby creating significant economies of scale and synergies. A major opportunity to lead the world in terms of wind energy infrastructure.
- c. An opportunity to nurture and grow the Suffolk Heritage Coast's nature based tourist economy.
- d. An opportunity for a grid connection to be chosen in line with the government's environmental policy to protect Areas of Outstanding Natural Beauty.
- e. And ultimately the opportunity to accelerate the government's wind energy targets.



4. INTEGRATION OFFSHORE AND ONSHORE

“It is critically important that coordination includes both the onshore and offshore network.”⁸

4.1 The National Grid ESO’s analysis⁹, highlighted in this report, shows that an integrated approach could significantly reduce the new infrastructure required onshore and offshore, as well as reducing the number of landing points. National Grid ESO found that an integrated approach could reduce the number of landing points by 50% if delivered by 2025, or 30% if delivered by 2030.

4.2 The ESO’s study also found that a coordinated approach could reduce the cumulative cost of building and operating new network infrastructure by £3bn-£6bn by 2050 (8%-18%), depending on how quickly coordination can be delivered.

5. MODULAR OFFSHORE GRID (MOG)

5.1 A coordinated offshore approach does not necessarily mean an offshore ring main. The report gives a case study of the Belgian transmission owner, Elia, who has built an offshore substation that will be used to connect at least four offshore wind farms to the onshore grid. This is called a ‘Modular Offshore Grid’ (MOG). This reduces the impact of new cables on the local environment. Elia estimates that the coordinated offshore network uses 30-40 km less cable compared to an uncoordinated approach.

5.2 Unlike an offshore ring main, this small scale integration is compatible with security of supply.

5.3 If ScottishPower Renewables (SPR) were willing, they could coordinate their EA1N and EA2 wind farms and deliver the power from those two farms together to a single site using HVDC rather than HVAC technology. Ofgem has confirmed within the Examination of EA1N and EA2 that *“there is scope for the development of shared assets and this can be considered within the existing regime.”*

⁸ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

⁹ The Offshore Co-ordination Phase 1 Final Report, National Grid Electricity System Operator (NGESO), 16 December 2020 [Link](#)



6. THE DEPARTMENT OF BUSINESS, ENERGY AND INDUSTRIAL STRATEGY, (BEIS) OFFSHORE TRANSMISSION NETWORK REVIEW (OTNR)

6.1 As the report emphasises, the overarching stated aim of the OTNR is:

“[To] ensure that the transmission connections for offshore wind generation are delivered in the most appropriate way, considering the contribution offshore wind is expected to make towards net-zero by 2050. This will be done with a view to finding the appropriate balance between environmental, social and economic costs”¹⁰

6.2 Importantly, this explicitly recognises the environmental and social impact of grid connections for offshore wind farms.

6.3 Crossed Wires recognises the importance of finding solutions that can reduce the social and environmental impacts of projects without risking delays or harming investor confidence.

6.4 A ‘split decision’ for EA1N and EA2 would enable such a solution. It would facilitate an alternative brownfield or industrialised grid connection to be brought forward and thereby ensure the onshore infrastructure minimises its environmental and community damage in line with the explicit aim of the BEIS OTNR Review. Alternative brownfield or industrialised sites have been identified such as Grain, Bramford¹¹ or Bradwell.¹²

7. EAST ANGLIA FOR FIRST PATHFINDER PROJECT

“Given the potentially large costs involved in encouraging projects to coordinate, we recommend that the Government focus only on the projects where early coordination could have the biggest benefits; the Government should focus on the East Anglia region, where there are six new offshore wind farms that are looking to connect to the onshore electricity network in mid-2020s and where proposals include new substations and many miles of underground cables onshore.”¹³

7.1 Very significantly, this report singles out East Anglia as the region for the Government to focus on with regard to greater integration and engagement with the BEIS OTNR ‘pathfinder’ projects.

¹⁰ BEIS OTNR Objective [Link](#)

¹¹ Substation Action Save East Suffolk (SASES), Pathfinder Update, 28 June 2021 [Link](#)

¹² Therese Coffey has been consistent in proposing Bradwell. Therese Coffey’s Deadline 10 Submission, 7 May 2021 [Link](#)

¹³ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)



7.2 SEAS wholeheartedly supports this positive suggestion. In the case of EA1N and EA2, these two projects can share the same technology, share the same developer (which would negate the need for changes to legislation) and therefore have opportunities to integrate offshore and reduce the harm to the environment. This does not require a ring main or shared assets but would enable an alternative grid location to be brought forward at a brownfield or industrialised site. This would lead to less damaging impacts on our environment and coastal tourism economies, in line with the environmental aims of the White Paper¹⁴ and the BEIS OTNR Review¹⁵.

7.3 Whilst SEAS welcome the report's calling for East Anglia to become the first Pathfinder project, it is important to realise that EA1N and EA2 should not in any way be classified as 'advanced' or 'in-flight'. Nor should they, as the report sometimes implies, be lumped in the same category as projects that have already received planning consent (e.g. EA3) or even projects which are much further down the planning path (e.g. Norfolk Vanguard). Let us be clear, EA1N and EA2 have only just reached the end of the examination period and as yet no recommendation has been received or made by the Secretary of State. As such they should be regarded as early enough in the development process to accommodate changes to the design of their grid connection which a 'split decision' would enable.

8. GOVERNMENT MUST UNDERWRITE ANY NEW RISKS

8.1 The report goes on to say that such a pathfinder project is only likely to be attractive to developers, if the government:

"Underwrites all additional costs incurred by the developers, including the cost of any delays to their projects such as lost CfD payments."¹⁶

8.2 SEAS supports this initiative which would incentivise developers to coordinate.

¹⁴ Energy White Paper, Powering our Net Zero Future, December 2020 [Link](#)

¹⁵ BEIS OTNR Objective [Link](#)

¹⁶ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)



9. CHANGES MUST BE DELIVERED WITHOUT SLOWING DOWN THE GOVERNMENT'S DRIVE TO NET ZERO

“The challenge for the Government is to deliver these changes without slowing down existing projects or damaging investor confidence in the UK’s offshore wind sector – any delays will put at risk the Government’s manifesto commitment for 40 GW of offshore wind capacity by 2030, and any harm to investor confidence will increase the cost of new offshore wind farms and lead to higher energy bills.”¹⁷

9.1 SEAS recognises the time critical political agenda. It is quite likely that even if the Applications for EA1N and EA2 are consented in full it may well miss the CfD (Contract for Difference) to begin later this year. In this case it may be late 2023/24 before the Applicant has an opportunity to bid in a CfD. By 2024, if a ‘split decision’ was granted and the consenting process was quickened, (as it has been suggested it will be by the Secretary of State for Business, Energy and Industrial Strategy, The Rt Hon Kwasi Kwarteng MP), SPR would have sufficient time to submit an alternative proposal with a grid connection designed to cherish our environment and also maximise efficiency. Viewed in this way, no time would be lost in achieving 40GW by 2030.

10. OFFSHORE WIND PROJECTS SHOULD BE BUILT AND CONNECTED IN PLACES WHERE THEY HAVE THE MOST VALUE

10.1 The report recommends that developers should be incentivised to build and connect projects near centres of demand so as to minimise the amount of new infrastructure that is required and reduce electricity bills through minimising ‘constraints costs’¹⁸.

“In future, the electricity network in East Anglia is likely to be increasingly constrained as more offshore wind farms connect there; therefore, each new wind farm built in these ‘constrained’ areas provides less overall value to the electricity system unless and until the network is upgraded. If the electricity market rules were reformed to encourage developers to build projects in place where they are most valuable and can therefore reduce energy bills the most, then it is possible that these wind farms off East Anglia

¹⁷ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

¹⁸ NGENSO expects constraint costs to rise to up to £2bn per year by late 2020s. The Offshore Co-ordination Phase 1 Final Report, National Grid Electricity System Operator (NGESO), 16 December 2020 [Link](#)



would have sought a grid connection nearer to London, where demand for electricity is higher.¹⁹

10.2 A split decision for EA1N and EA2 would enable a more suitable onshore site connection to be chosen closer to centres of demand. For example, as the Secretary of State for Work and Pensions, the Rt Hon Thérèse Coffey MP says:

“The long-term capacity of Bradwell as an integrated Wind Energy Hub has significantly greater potential than the Friston site. It is closer to London and on the coast thus negating the need for cable corridors to be dug and re-dug with every future wind farm project attempting to connect to the Grid. It is a brownfield site and in need of development”²⁰

11. THE DANGER OF LEGAL CHALLENGE TO PLANNING CONSENT

“Without reform, there is a risk that new projects will face growing local opposition, including through the courts, that will slow down the UK’s offshore wind programme, limiting jobs and slowing down cuts to emissions.”²¹

11.1 The report recognises that legal challenges to planning consents, as has already occurred in Norfolk, will cause severe delays to the next phase of the offshore wind programmes.

11.2 The UK clearly needs to ramp up the construction of wind farms. It is thus essential that we get this East Anglian Hub right NOW and save time by avoiding a costly and lengthy judicial review process not only for EA1N and EA2 but for the future projects planned to connect on the shores of East Anglia such as Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.

12. COSTS

12.1 The report states that the current rules are likely to increase energy bills, with analysis from the Electricity System Operator showing that more coordination could

¹⁹ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

²⁰ Therese Coffey’s Deadline 10 Submission to PINS, 7 May 2021 [Link](#)

²¹ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)



save between £3bn and £6bn by 2050, depending on how quickly it can be implemented.²²

12.2 Infrastructure coordination to a brownfield site is needed to avoid the higher costs caused by the current approach.

13. INTEGRATED GRID CONNECTIONS MUST BE TAKEN TO A BROWNFIELD OR INDUSTRIALISED SITE

13.1 The report does not go far enough. Integration in itself is not enough to protect our biodiversity and rural communities. Only if integrated grid connections are taken forward at **brownfield or industrialised sites** can the impacts of offshore wind farm infrastructure be minimised. In today's world if our environment is not protected for our future generations, then the Government will not receive support for the UK's decarbonisation efforts.

14. NEITHER MITIGATION NOR COMPENSATION IS THE ANSWER

14.1 However this report suggests weak and regressive caveats to fall back upon.

“Where new onshore infrastructure is needed, we should compensate local communities through new ‘Offshore Wind Wealth Funds’”²³

“The Government should compensate communities impacted by the construction of offshore wind farms and associated infrastructure such as substations and cable routes”²⁴

14.2 SEAS rejects this suggestion. No amount of money can compensate for the needless and permanent loss of our environment and rural communities. This degree of damage to environmentally sensitive and diverse landscapes brimming with biodiversity is unmitigable, unacceptable and given the availability of better industrialised or alternative brownfield sites either on the coast or using existing cable routes, indefensible.

²² The Offshore Co-ordination Phase 1 Final Report, National Grid Electricity System Operator (NGESO), 16 December 2020 [Link](#)

²³ Crossed Wires: Maintaining public support for offshore wind farms, A Policy Exchange Report July 2021 [Link](#)

²⁴ Ibid



15. CONCLUSION

15.1 There is no reason why Coastal Suffolk cannot develop a coordinated onshore and offshore electricity network that reduces bills, minimises disruption and protects the local environment. In today's world if our environment is not protected then the Government will not receive support for the UK's decarbonisation efforts. Only if integrated grid connections are taken forward at a brownfield or industrialised site can the impacts of offshore wind farm infrastructure be minimised.

SEAS July 2021



Nautilus Interconnector

National Grid Ventures

Update on our proposals and
consultation programme | **September 2021**

nationalgrid

Introducing Nautilus Interconnector

At National Grid Ventures (NGV), we are bringing forward plans for Nautilus, a new multi-purpose interconnector (MPI) that could supply enough electricity to power around 1.4 million UK homes.

Nautilus could connect up to 1.4 gigawatts (GW) of offshore wind to the transmission systems of Great Britain and Belgium through a subsea electricity cable called an interconnector. The 1.4 GW interconnector could connect up to 2.8 GW of offshore wind, given the import and export capability of the high voltage direct current (HVDC) cable to two demand centres (Great Britain and Belgium). The project would include underground cabling works and onshore infrastructure, located in East Suffolk.

We are seeking feedback on Nautilus as part of its development process, including options for the onshore infrastructure – namely, a cable route, landfall and converter station search areas. These emerging options are detailed in this Briefing Pack on page 10.

The previous briefing pack published in April 2021 provided initial information on the project in its early stages. This briefing pack provides an update on our plans for Nautilus and the details for our non-statutory consultation – which will begin on 14 September and will run for 6 weeks, closing on 26 October.

National Grid Ventures (NGV)

Proposals for Nautilus are being developed by NGV and our partner in Belgium, Elia. Elia is the Belgian National Transmission System Operator (TSO).

Elia and NGV have a track record of working together successfully during the development of Nemo Link. Operational since 2019, this interconnector connects Belgium and Great Britain (GB) electricity networks providing both countries with access to electricity generation, improved grid reliability and access to cheaper electricity for consumers.

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There are three distinct electricity business entities under the umbrella of National Grid plc in the UK, as detailed in the diagram below, all with different roles and responsibilities. The separation between NGV, National Grid Electricity Transmission (NGET) and National GridESO stipulates that NGV is treated the same way as any other energy project promoter.

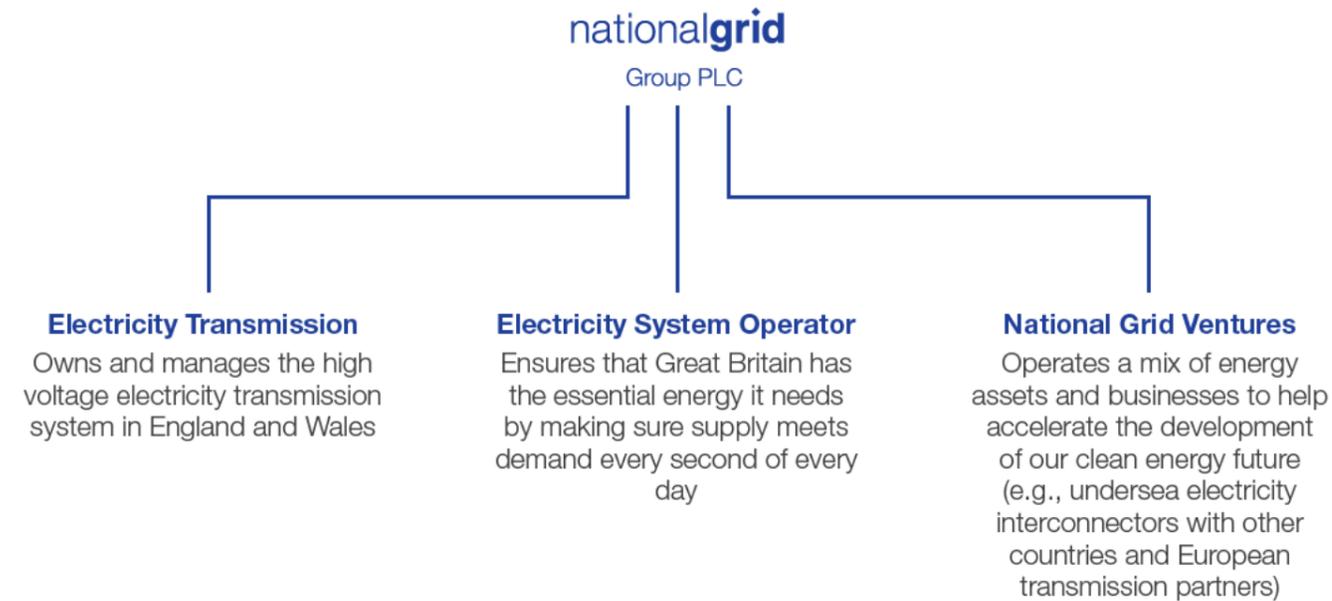


Figure 1: National Grid plc's electricity business entities in the UK

Our vision for the scheme

Building upon our experience as a world leading developer and operator of interconnectors, we have been working closely with Elia, BEIS, Ofgem and numerous non-governmental organisations to develop the next generation of interconnector and wind connection technology – multi-purpose interconnectors (MPIs).

MPIs are subsea electricity cables which travel between two countries connecting offshore wind farm/s to both markets. This technology marks an evolution from point-to-point interconnection and radially connected wind.

By combining offshore wind generation with interconnector capacity between GB and Belgium, Nautilus will reduce the amount of infrastructure required both onshore and offshore. In doing so we will be able to reduce the impact on the affected community and environment, as well as delivering a pathway towards a more integrated offshore network.

Since 2019 we have been engaging in the area with local councils, parish and town councils and community groups across East Suffolk to gain a better understanding of their interests and concerns. From this engagement it has been made clear that there is a need for greater coordination and cooperation between energy developers in the region, in particular relating to connections to the electricity transmission network.

Developing Nautilus as a MPI rather than a traditional point-to-point interconnector is our first step in responding to this feedback. Going forward, throughout the consenting, development and construction process we intend to coordinate as far as possible with other developers in the area in order to best address the interests of the environment and local communities.



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These cables will come onshore at a point known as 'landfall' and will be buried underground. At the landfall very little will be visible once the works have been completed, although there may be some relatively small-scale equipment visible above ground. A kiosk type structure (similar to a telephone exchange) may be required at the landfall location to boost the signal for the subsea fibre optic communication system.

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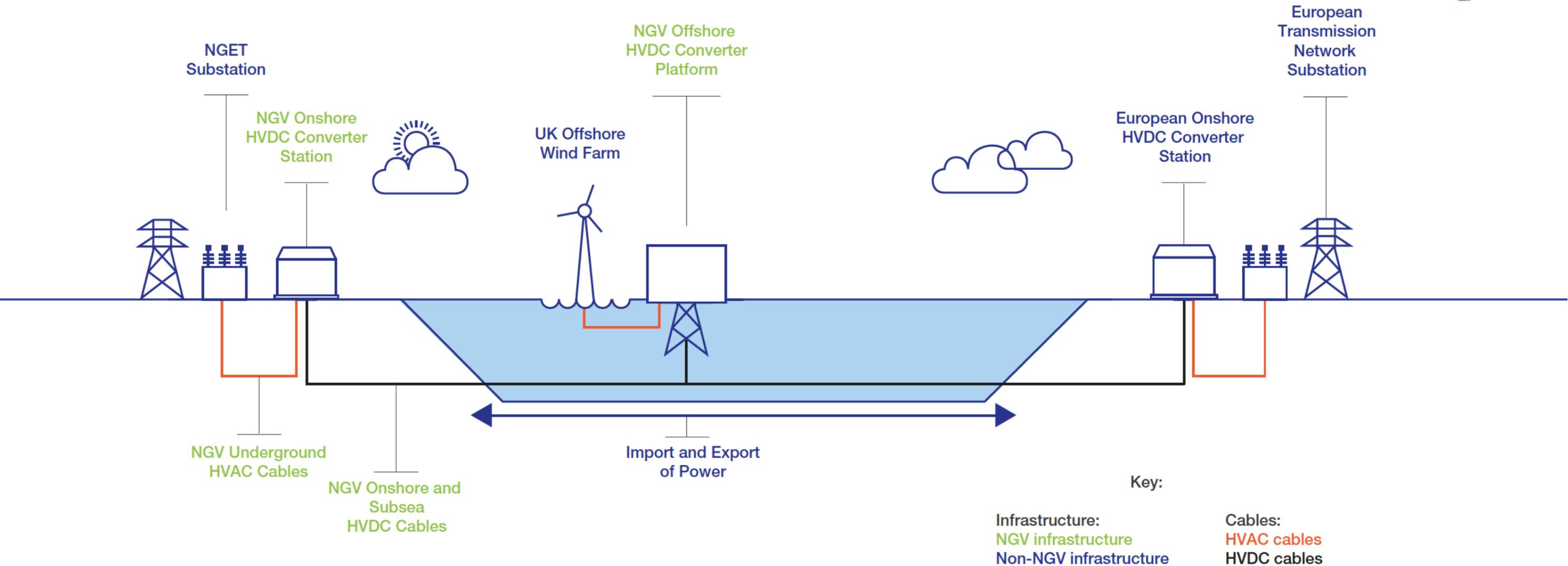


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Nautilus onshore

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Converter station search areas, landfall site options and cable corridor options

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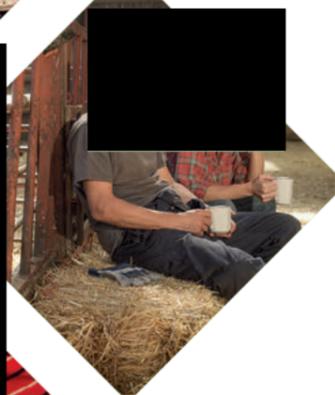
For our landfall site options, nearshore constraints were also considered including:

- Shipping and vessel activity
- Commercial fishing and recreational usage
- Marine archaeology

Considering different scenarios

We recognise that the Friston substation has not yet been consented. We participated in the Development Consent Order (DCO) Examinations for East Anglia One North and East Anglia Two as an Interested Party and continue to monitor the outcome. Parallel to our siting and routeing work, we are continuing to consider the potential coordination opportunities associated with our connection area.¹

MPIs present the opportunity for coordination of multiple projects. For Nautilus this means both providing a connection opportunity for new offshore wind farm/s (integration) and exploring the ability to co-locate with projects to reduce potential impacts both onshore and offshore (collaboration). Currently, our work involves exploring different scenarios for potential coordination. This work is at a very early draft stage, and we are not able to share further details during this consultation. However, the feedback you provide now will help inform our work on this.



¹ Our connection agreement for Nautilus relates to a new National Grid Electricity Transmission (NGET) substation on the Sizewell 400 kilovolts (kV) network in the 'Leiston area'. The connection agreement therefore relates to an area rather than a specific location.

Initial siting and routing options

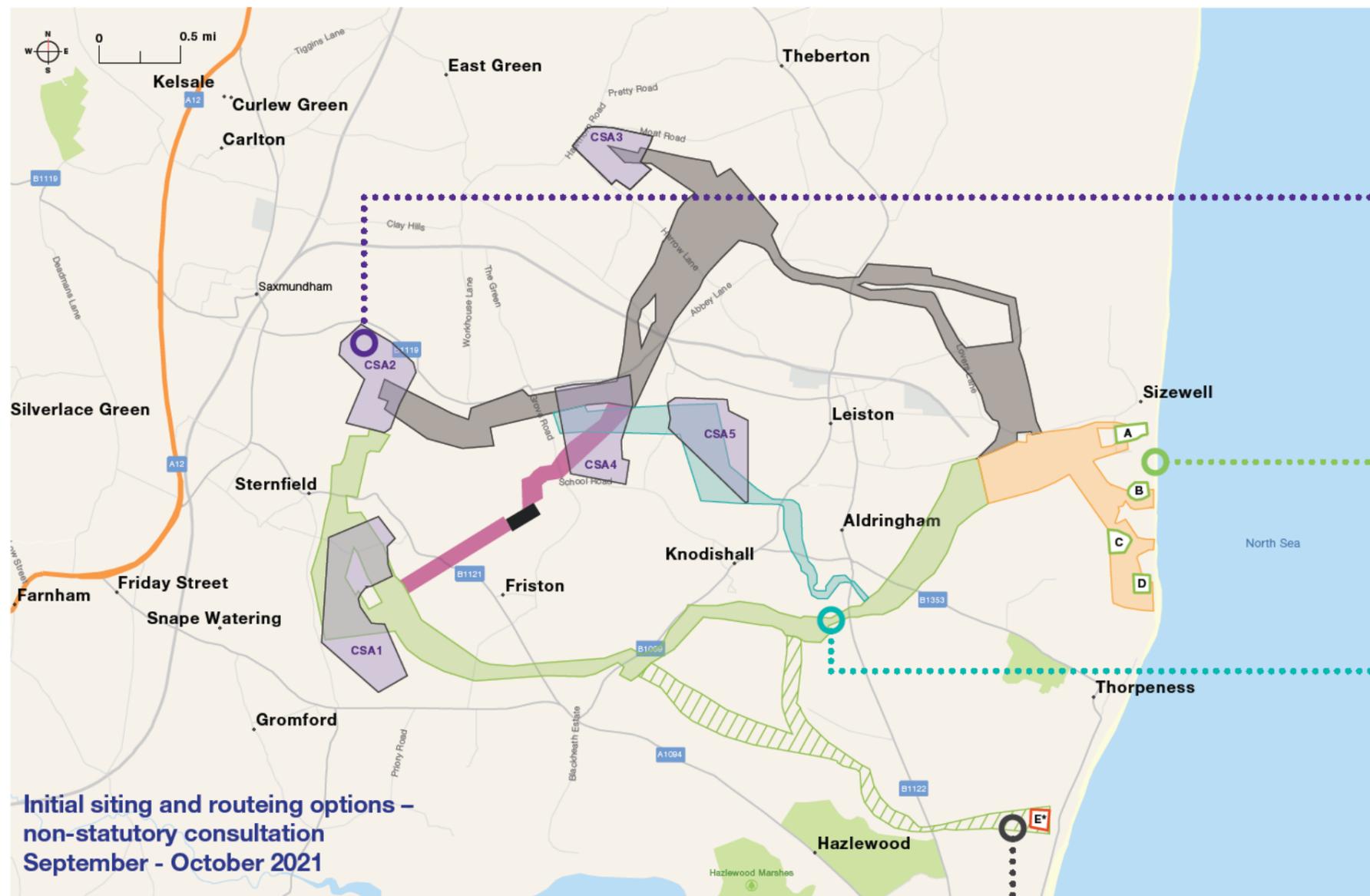


Figure 3: Initial siting and routing options

Key

- Landfall location options
- Landfall E - least preferred onshore*
- Northern cable route corridor
- Southern cable route corridor
- Shared route for Northern and Southern corridor
- Central cable route corridor
- Landfall E cable route corridor
- Converter station search areas
- Friston substation
- Cable corridors for grid connection

Converter station search areas

We have identified five shortlisted converter station search areas. A typical footprint for a converter station site covers an area of five hectares (12 acres). This includes space for construction lay down areas as well as the converter station building. The converter station will have a height of up to 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

Landfall options

The landfall location is the point where our cables come ashore and typically requires a working area of two hectares during construction. The cables will be buried underground at the landfall site. We have identified five landfall location options within the search area.

Cable route options

We have undertaken an initial screening of constraints to identify possible cable corridors between the emerging landfall options and converter station search areas, and between the converter station search areas to the proposed National Grid substation in Friston.

More detailed OS Maps will be available online and at our events.

*While Landfall E has not been discounted, it is heavily constrained from an onshore perspective. Landfall E is located within an Important Bird Area (IBA), RSPB reserve and Site of Special Scientific Interest (SSSI). It is also located close to a Special Protection Area (SPA) and County Wildlife Site. These ecological features present substantial siting and routing challenges. As such, Landfall E is not preferred from an onshore perspective. However, due to environmental features and technical constraints in the marine environment we need to consider this Landfall options from an offshore perspective in order to confirm that one or more of the landfall options that have been identified are achievable. We will also consider any engineering measures which could reduce potential effects if it emerges that there is a need for Landfall E to be progressed.

Nautilus offshore

As well as developing our onshore proposals we are also progressing assessments of the project in the marine environment. Offshore components for Nautilus will include:

- Offshore converter station platform/s
- A submarine High Voltage Direct Current (HVDC) interconnector

There are a number of factors which will influence the infrastructure required in the marine environment including ongoing discussions with the supply chain, technical assessment and discussions with offshore wind farm developers.

Submarine HVDC interconnector

The interconnector will comprise of HVDC submarine cables. These will be installed between the two respective landfall locations in Belgium and East Suffolk and, where possible, will be buried within the seabed. Where it's not possible, it will be protected by non-burial methods such as the placement of rocks on top of the cable. Although the offshore interconnector route is yet to be defined, its total length between Belgium and East Suffolk will be approximately 200 kilometres (km).

Offshore converter station platforms

Offshore wind farm/s will be connected to the interconnector via an offshore HVDC converter station platform. The design and configuration of the offshore HVDC converter station platform is still in its early stages.

The approximate maximum dimensions for an offshore HVDC converter station could be 110 metres in length and 80 metres wide, with a height of 45 metres. Note that the converter station will be installed on foundations (jacket) elevating it above the water surface and the height of the jacket, and therefore total platform structure will depend on water depth at the chosen location.

If Nautilus connects more than one offshore wind farm then it may be necessary to have two separate offshore converter platforms in order to reduce the length of cabling connecting the offshore wind farms.

This would be subject to further engagement with stakeholders and relevant offshore wind farms.

Our engagement with engineering specialists is ongoing as we continue to discuss and refine what the detailed infrastructure requirements are in the offshore marine environment.

Offshore siting and routing

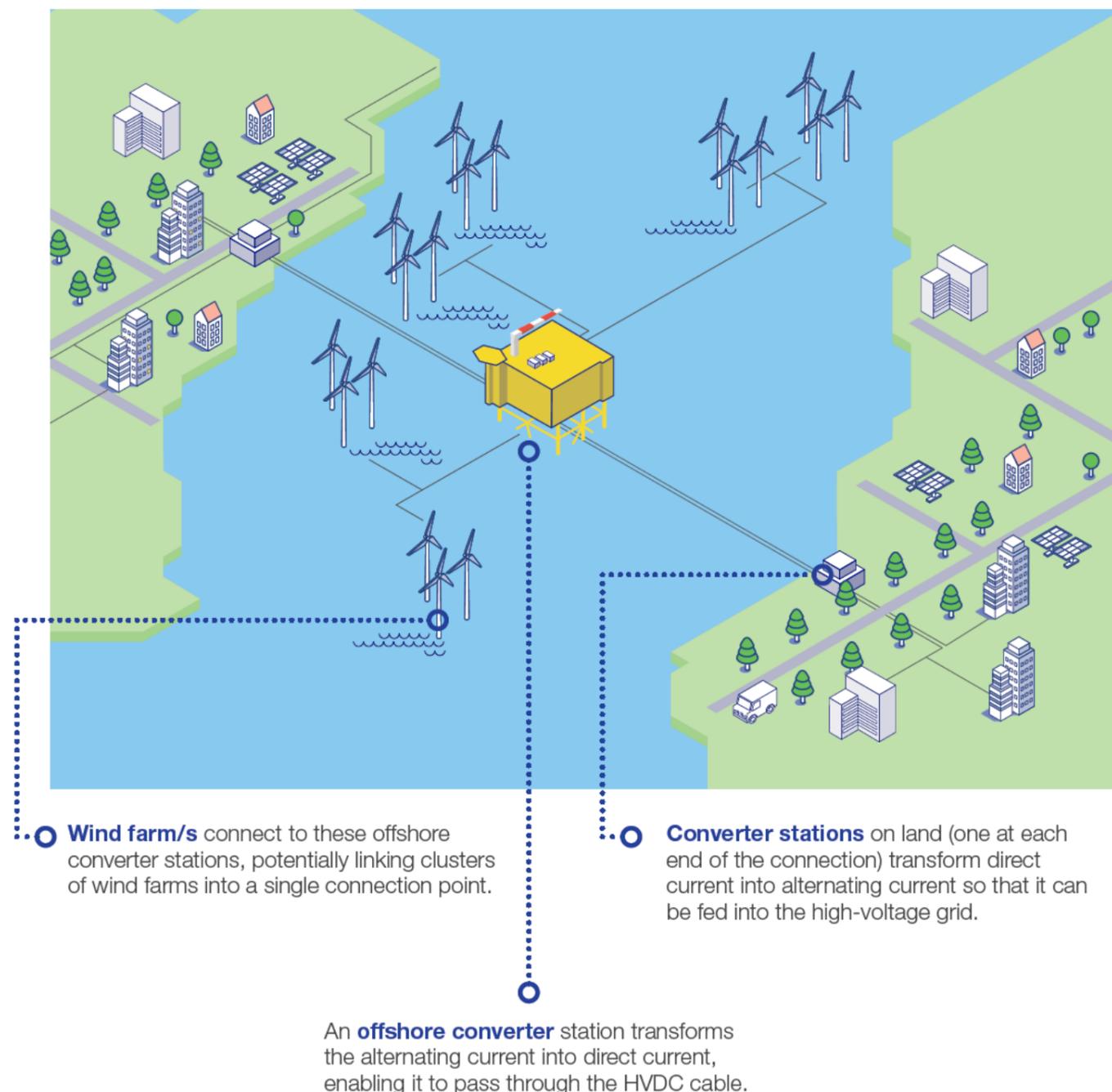
We are currently identifying potential cable route options and possible location options for the offshore HVDC converter station platform (and any additional infrastructure). As part of this process, we have mapped environmental, social and engineering information to gain a better understanding of the constraints and features that are present in the study area. Key criteria considered to identify routes and sites includes:

- Nature conservation designations and protected habitat areas
- Existing and planned infrastructure (cables, pipelines, wind farms), aggregate extraction areas and disposal sites
- Navigational features, anchorages, major shipping routes, commercial fishing grounds, wrecks
- Water depth, seabed sediment and other seabed features

Once we have identified potential options we will engage with relevant technical marine stakeholders and fisheries organisations to help inform the development and refinement of these options. The location of the offshore platform will be informed by the alignment of the interconnector cables and the proposed location of the wind farm schemes.

Tomorrow: offshore wind and Interconnectors in harmony

MPIs enable offshore wind and interconnection to work together as a combined asset.



Our consultation

Our consultation starts on Tuesday 14 September and will run for six weeks, closing on Tuesday 26 October. Our communication lines will still be open following this period and there will be more opportunities to comment on our proposals once these have been refined.

This consultation and our local information events are an important part of our pre-application consultation. Understanding what issues are most important for the local community is key, and the feedback gathered at these events will help us to shape our proposal going forward.

Community drop-in sessions

We are planning to hold public events at different locations across our consultation area. These events will complement our online consultation process and be a direct opportunity for you to view our plans, discuss them with members of the project team, and provide feedback on them.

Details of the local information events can be found below:

Tuesday 28 September - 4pm to 8pm - Leiston Community Centre, King George's Avenue, Leiston, Suffolk, IP16 4JX

Wednesday 29 September - 10am to 2pm - Friston Village Hall, Church Road, Friston, Suffolk, IP17 1PU

Thursday 30 September - 4pm to 8pm - Thorpeness Pavilion, Thorpe Road, Thorpeness, Suffolk, IP16 4FD

Friday 1 October - 10am to 2pm - Saxmundham Market Hall, High St, Saxmundham IP17 1AF

Community webinar events

We will also be holding community webinar events during our consultation period. You will be able to join by video call or phone to hear more from the project team and ask any questions you may have. These will be held on:

- **Thursday 7 October 2021** from 10am to 12pm
- **Tuesday 12 October 2021** from 6pm to 8pm

A detailed step-by-step guide for how to access our community webinars, along with webinar links and telephone dial-in details are available on our website: nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

Virtual exhibition

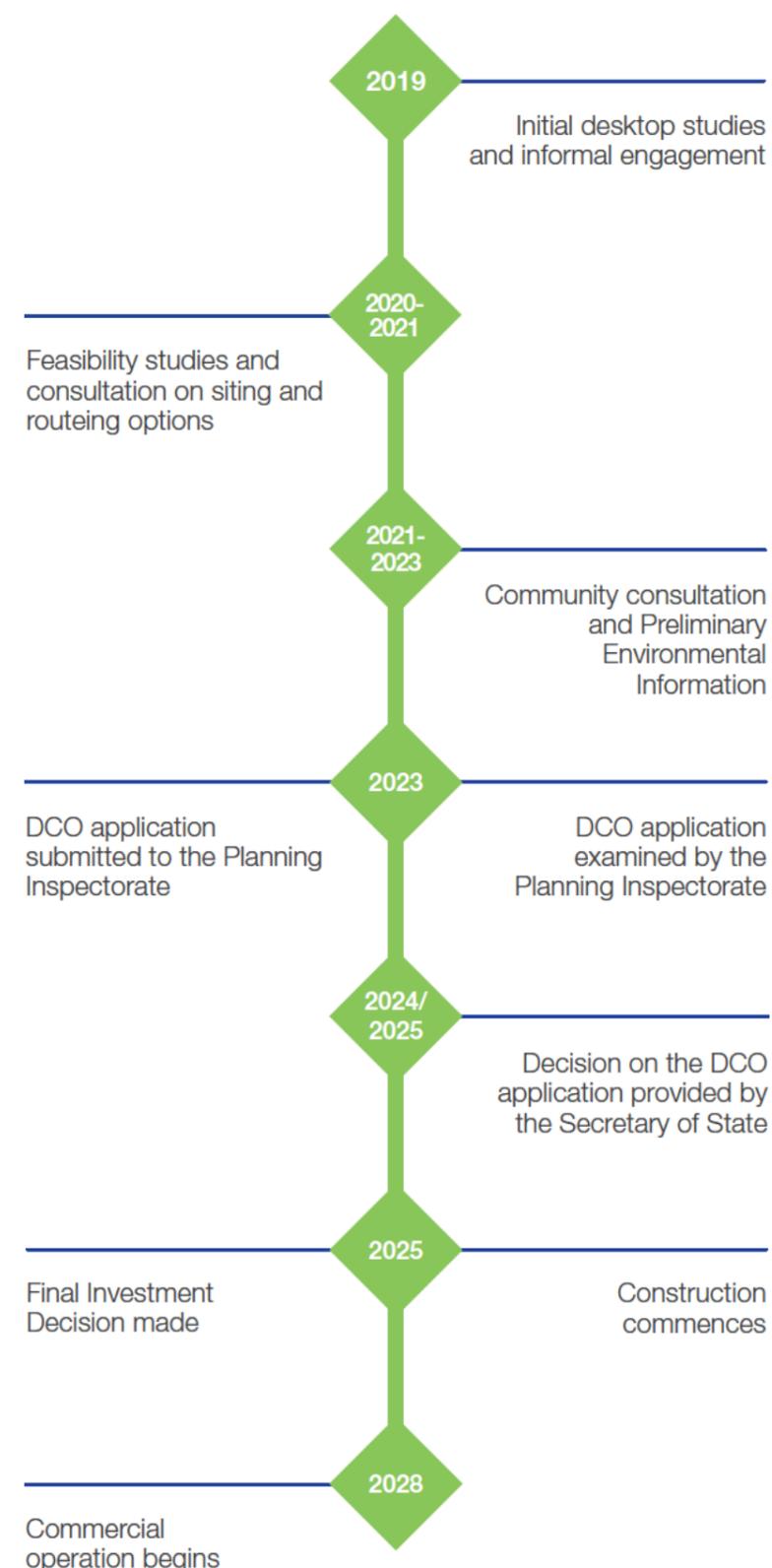
For anyone unable to attend our consultation events, we have created a virtual version which is accessible through our project website and contains the same information: nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

Have your say

You can access our consultation material and provide your views in the following ways:

- In person by attending one of our events
- Online via our project website
- By post by writing a letter or completing one of our feedback forms and posting it back to us free of charge to our Freepost address on the back page of this leaflet
- You can also email us, call us or write to us using the details on the back page of this leaflet

Indicative Timeline*



*Please note, all dates are indicative.

Contact us

Please don't hesitate to get in touch if you would like to find out more information about Nautilus Interconnector.

You can contact a member of our Community Relations Team to find out more by using the details below.



Write to us at:
Freepost Nautilus Interconnector



Email us at:
info@nautilusinterconnector.com



Call our Freephone information line:
08081 699 822



For more information about Nautilus Interconnector please visit:
www.nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

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For all sources, please visit our website or contact a member of our team.

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**National Grid
Interconnector Holdings Limited**

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United Kingdom
Registered in England and Wales No.8169384

nationalgrid.com

Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS Final Submission re:
CUMULATIVE IMPACT
Deadline October 6, 2021**

The ExA's recommendations to the Secretary of State BEIS

by

SEAS (Suffolk Energy Action Solutions)

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

Unique Ref. No. EA2: 2002 4496

SEAS Final Submission re: CUMULATIVE IMPACT Deadline October 6, 2021

The ExA's recommendations to the Secretary of State BEIS

Further information with regard to Cumulative Impact and Nautilus Interconnector - 29 September 2021

1. On 14 September 2021 the Nautilus Interconnector Project Consultation was launched by National Grid Ventures¹.

2. The following resources have been made available on their website:
 - a. [Nautilus Interconnector Briefing Pack, NGV, September 2021](#)
 - b. [Nautilus Interconnector FAQs, NGV, September 2021](#)
 - c. [Nautilus Interconnector Information Sheets, NGV, September 2021](#)
 - d. [Nautilus Interconnector Maps, NGV, September 2021](#)

3. In the launching of the Nautilus consultations and the current planning application for EA1N (East Anglia One North) and EA2 (East Anglia Two) offshore wind projects we begin to see the true extent of National Grid's plans for rural East Suffolk.

4. An energy hub, on an enormous scale. To be the largest energy hub in the UK with a site the size of the Vatican City and the substations planned for SPR's projects alone nearly three times the size of Wembley Stadium.

¹ [Nautilus Interconnector, National Grid Ventures](#)

5. The harsh reality is that this is just the beginning. National Grid Ventures has recently confirmed that the consultations for Eurolink Interconnector and Sea Link (previously SCD1) begin next year, both with plans to connect to the National Grid substation at Friston²,. Further additional projects SCD2 and offshore windfarms Five Estuaries and North Falls are also widely believed to be planned to connect to the National Grid here. With the addition of Sizewell C Nuclear Power Station, this will become the largest complex of energy infrastructure in the UK. Nautilus is only the first of an onslaught of more projects now in the public domain and planned for this region.
6. For further evidence of future projects please read SEAS previous submissions on cumulative impact. (Deadline 13 Submission [[REP13-072](#)], Deadline 11 Submission [[REP11-183](#)], Deadline 9 [[REP9-087](#)], Deadline 8 [[REP8-242](#)], Deadline 6 [[REP6-141](#)] and Deadline 5 [[REP5-115](#)]).
7. Cumulative Impact Assessments are a legal requirement of the Planning Inspectorate's Examination procedure.
8. The Norfolk Vanguard wind farm Development Consent Order was overturned in a Judicial Review due to the failure to give full consideration to Cumulative Impact, which goes to underline the significance of the point.
9. Despite repeated requests from the Inspectors and Interested Parties, SPRs approach to cumulative impact was to ignore it or to provide the minimum possible information.

SPR has never provided a complete cumulative impact assessment of energy projects planned for the immediate area.

10. Cumulative adverse impacts include:

- 10.1 Multiple landfalls on a fragile coastline of coralline crag (which is sand-based and already crumbling) near Thorpeness.

² As confirmed by National Grid Ventures in a meeting with community groups in Thorpeness on 30 September 2021.

10.2 Multiple cable routes to run for approximately 9 km through the Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the Sandlings SPA (Special Protected Area) and multiple villages to connect to the National Grid at an energy hub located in the heart of the ancient village of Friston in rural Suffolk.

10.3 A converter station for Nautilus Interconnector with a height of up to 24 metres over a site of 12 acres. This could impact on additional communities including Theberton, Kelsale, Leiston, Sternfield, Snape and Saxmundham.

10.4 Research commissioned by the Suffolk Coast Destination Management Organisation (DMO), suggests that new energy projects on the Suffolk coastline could damage one of the UK's most successful nature based tourism centres by up to £40 million per annum. This will crucially lead to loss of jobs in hospitality and other tourist related businesses.

10.5 Intolerable noise pollution, light pollution and air pollution to local communities, wildlife and livestock.

11. This will become a substantial complex of industrial scale infrastructure in the midst of unspoilt rural Suffolk, unmitigable and indefensible given the alternatives available.
12. It is obvious to anyone visiting this area that the adverse impacts will outweigh any benefits to this region. Quite simply a catastrophe for the region.
13. 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, a 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

14. There is quite simply a better, greener solution. SEAS endorse the Rt Hon Therese Coffey MP's proposal of a split decision which grants consent for the offshore infrastructure but 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 industrialised site. This gives time to enable Ofgem/BEIS to follow through on the aims of the Offshore Transmission Network Review and pivot to better solutions for onshore wind energy infrastructure using a reduced number of cable routes to a brownfield site.

End



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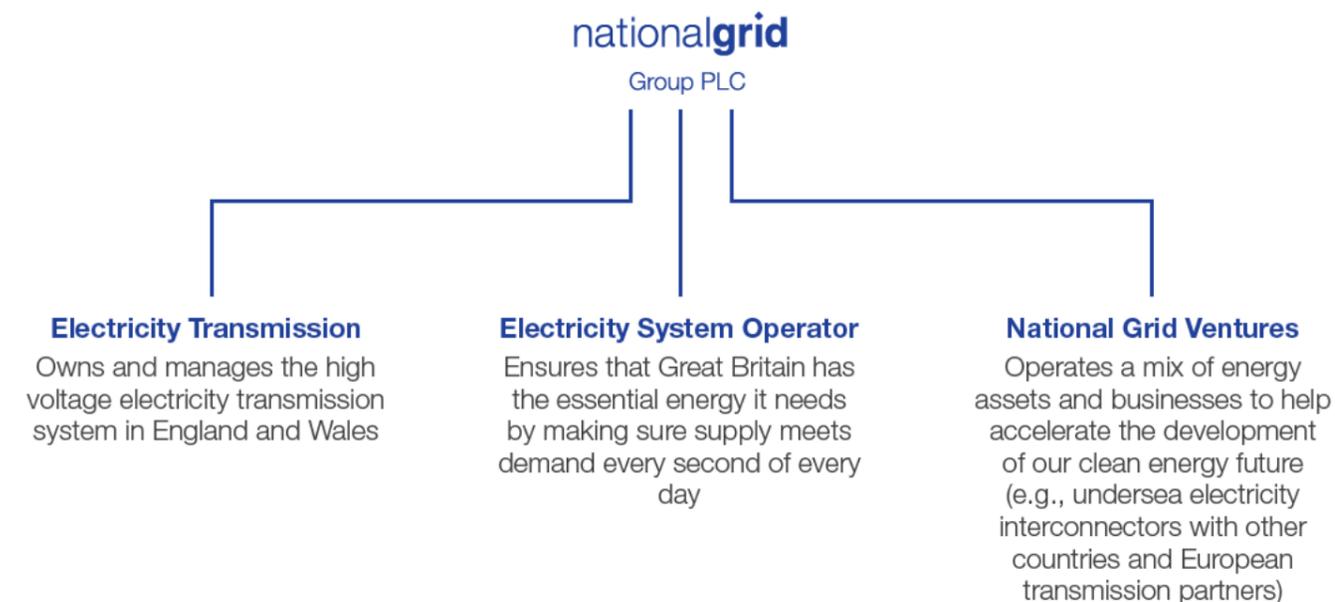


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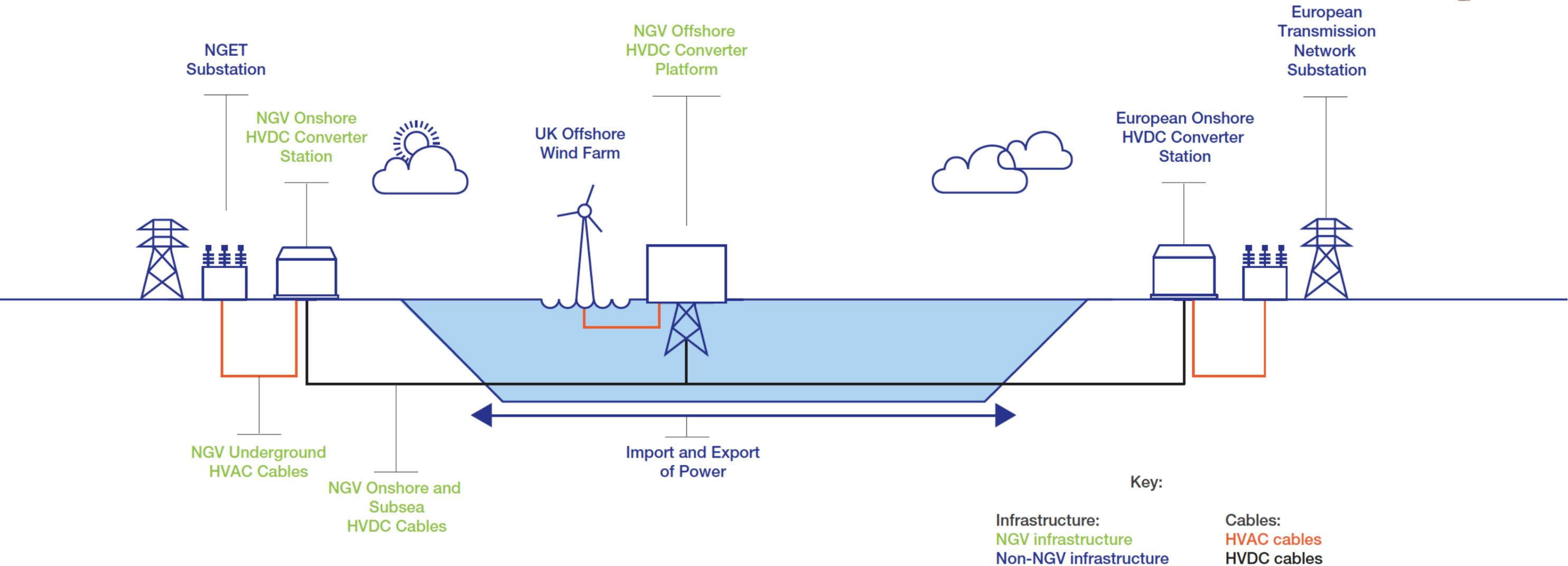


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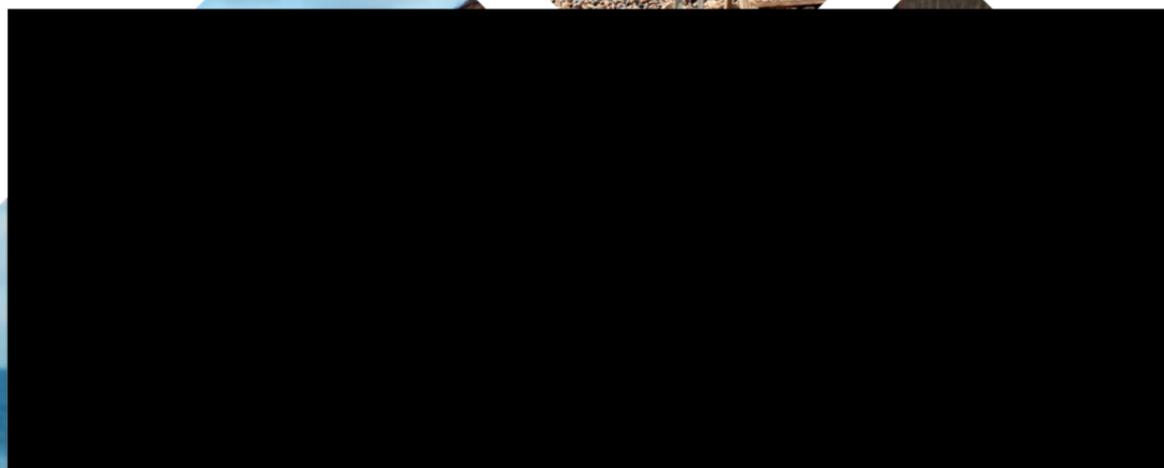
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- Marine archaeology

Considering different scenarios

We recognise that the Friston substation has not yet been consented. We participated in the Development Consent Order (DCO) Examinations for East Anglia One North and East Anglia Two as an Interested Party and continue to monitor the outcome. Parallel to our siting and routeing work, we are continuing to consider the potential coordination opportunities associated with our connection area.¹

MPIs present the opportunity for coordination of multiple projects. For Nautilus this means both providing a connection opportunity for new offshore wind farm/s (integration) and exploring the ability to co-locate with projects to reduce potential impacts both onshore and offshore (collaboration). Currently, our work involves exploring different scenarios for potential coordination. This work is at a very early draft stage, and we are not able to share further details during this consultation. However, the feedback you provide now will help inform our work on this.



¹ Our connection agreement for Nautilus relates to a new National Grid Electricity Transmission (NGET) substation on the Sizewell 400 kilovolts (kV) network in the 'Leiston area'. The connection agreement therefore relates to an area rather than a specific location.

Initial siting and routing options

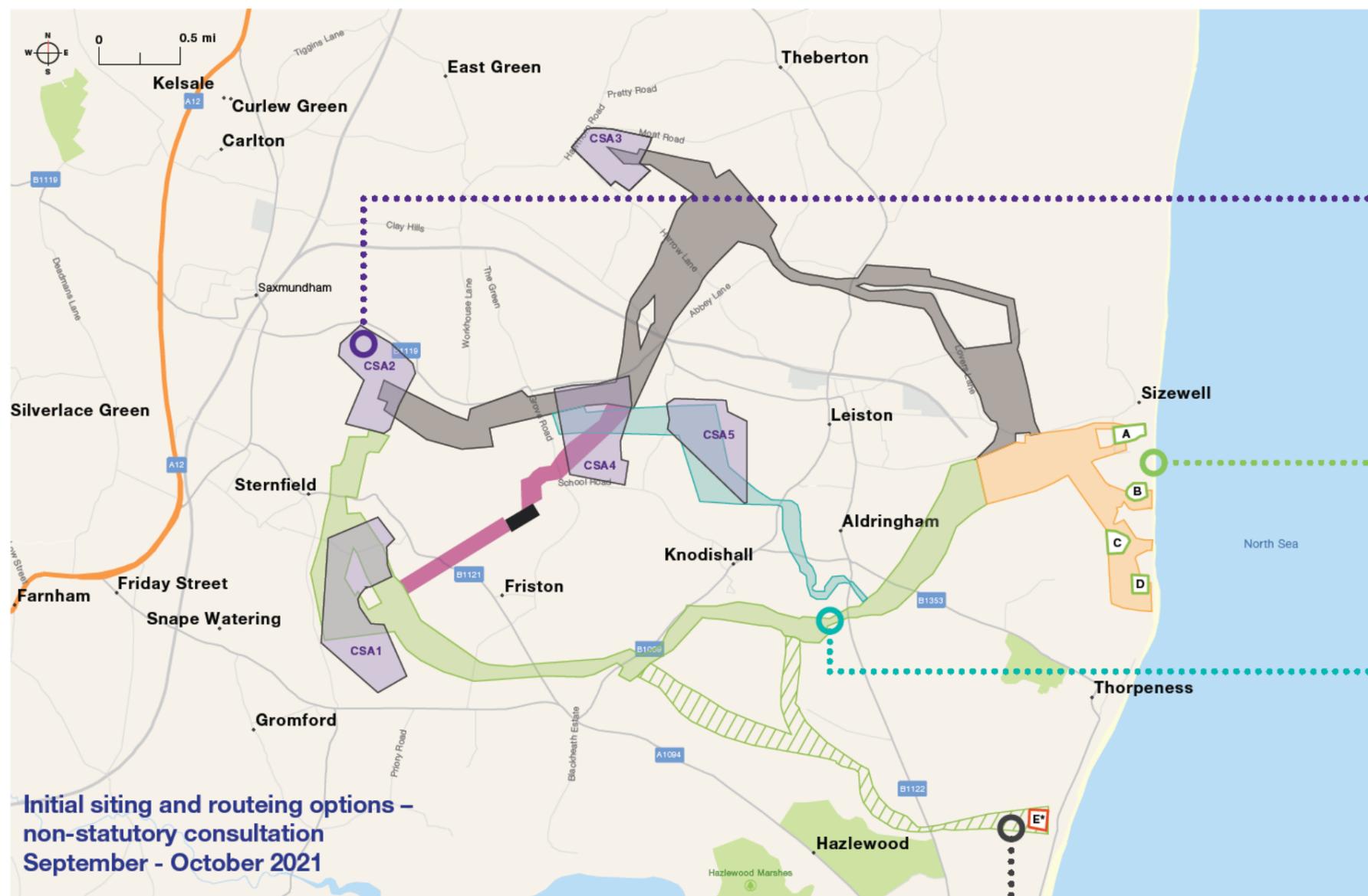


Figure 3: Initial siting and routing options

Key

- Landfall location options
- Landfall E - least preferred onshore*
- Northern cable route corridor
- Southern cable route corridor
- Shared route for Northern and Southern corridor
- Central cable route corridor
- Landfall E cable route corridor
- Converter station search areas
- Friston substation
- Cable corridors for grid connection

Converter station search areas

We have identified five shortlisted converter station search areas. A typical footprint for a converter station site covers an area of five hectares (12 acres). This includes space for construction lay down areas as well as the converter station building. The converter station will have a height of up to 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

Landfall options

The landfall location is the point where our cables come ashore and typically requires a working area of two hectares during construction. The cables will be buried underground at the landfall site. We have identified five landfall location options within the search area.

Cable route options

We have undertaken an initial screening of constraints to identify possible cable corridors between the emerging landfall options and converter station search areas, and between the converter station search areas to the proposed National Grid substation in Friston.

More detailed OS Maps will be available online and at our events.

*While Landfall E has not been discounted, it is heavily constrained from an onshore perspective. Landfall E is located within an Important Bird Area (IBA), RSPB reserve and Site of Special Scientific Interest (SSSI). It is also located close to a Special Protection Area (SPA) and County Wildlife Site. These ecological features present substantial siting and routing challenges. As such, Landfall E is not preferred from an onshore perspective. However, due to environmental features and technical constraints in the marine environment we need to consider this Landfall options from an offshore perspective in order to confirm that one or more of the landfall options that have been identified are achievable. We will also consider any engineering measures which could reduce potential effects if it emerges that there is a need for Landfall E to be progressed.

Nautilus offshore

As well as developing our onshore proposals we are also progressing assessments of the project in the marine environment. Offshore components for Nautilus will include:

- Offshore converter station platform/s
- A submarine High Voltage Direct Current (HVDC) interconnector

There are a number of factors which will influence the infrastructure required in the marine environment including ongoing discussions with the supply chain, technical assessment and discussions with offshore wind farm developers.

Submarine HVDC interconnector

The interconnector will comprise of HVDC submarine cables. These will be installed between the two respective landfall locations in Belgium and East Suffolk and, where possible, will be buried within the seabed. Where it's not possible, it will be protected by non-burial methods such as the placement of rocks on top of the cable. Although the offshore interconnector route is yet to be defined, its total length between Belgium and East Suffolk will be approximately 200 kilometres (km).

Offshore converter station platforms

Offshore wind farm/s will be connected to the interconnector via an offshore HVDC converter station platform. The design and configuration of the offshore HVDC converter station platform is still in its early stages.

The approximate maximum dimensions for an offshore HVDC converter station could be 110 metres in length and 80 metres wide, with a height of 45 metres. Note that the converter station will be installed on foundations (jacket) elevating it above the water surface and the height of the jacket, and therefore total platform structure will depend on water depth at the chosen location.

If Nautilus connects more than one offshore wind farm then it may be necessary to have two separate offshore converter platforms in order to reduce the length of cabling connecting the offshore wind farms.

This would be subject to further engagement with stakeholders and relevant offshore wind farms.

Our engagement with engineering specialists is ongoing as we continue to discuss and refine what the detailed infrastructure requirements are in the offshore marine environment.

Offshore siting and routing

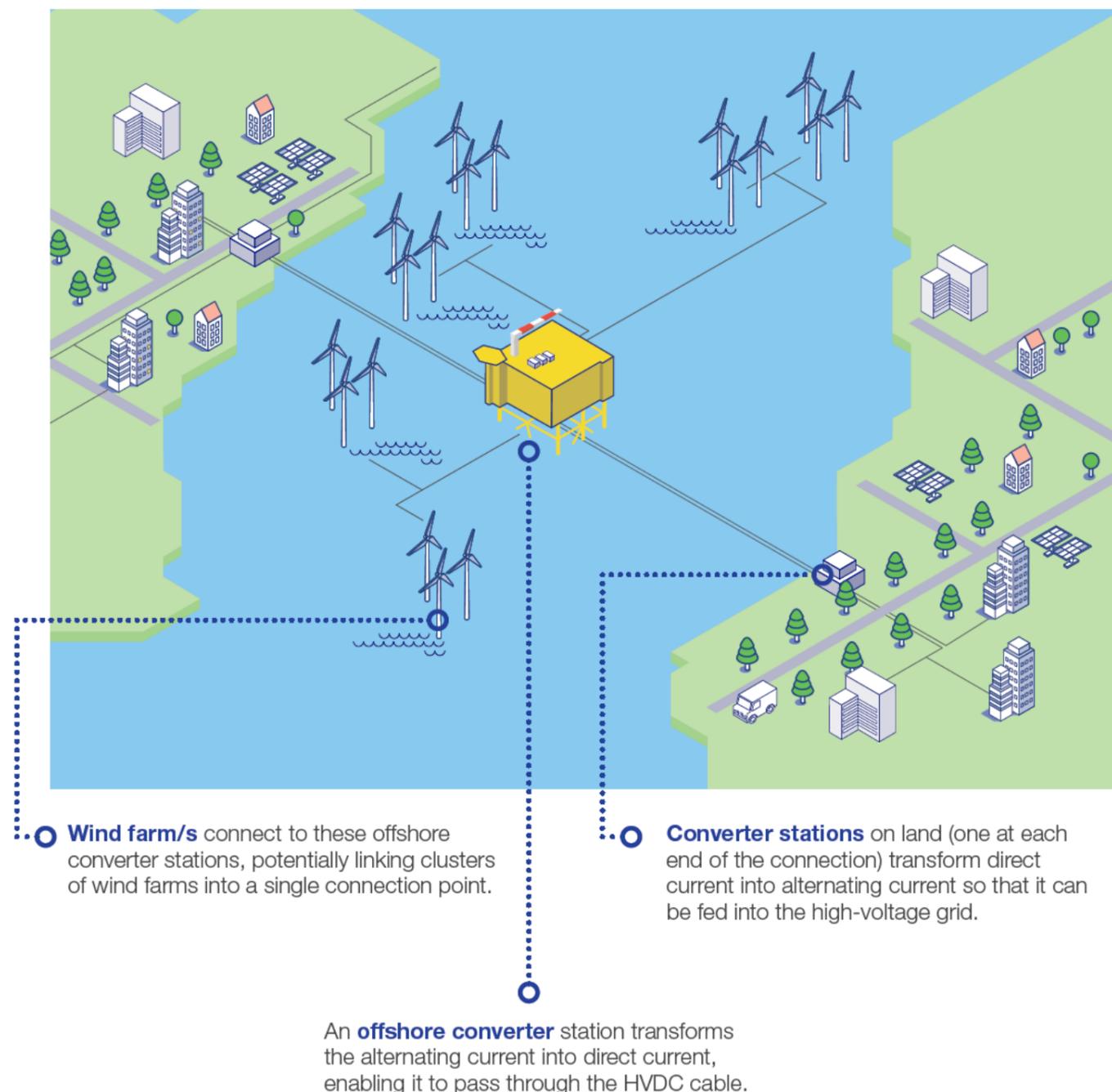
We are currently identifying potential cable route options and possible location options for the offshore HVDC converter station platform (and any additional infrastructure). As part of this process, we have mapped environmental, social and engineering information to gain a better understanding of the constraints and features that are present in the study area. Key criteria considered to identify routes and sites includes:

- Nature conservation designations and protected habitat areas
- Existing and planned infrastructure (cables, pipelines, wind farms), aggregate extraction areas and disposal sites
- Navigational features, anchorages, major shipping routes, commercial fishing grounds, wrecks
- Water depth, seabed sediment and other seabed features

Once we have identified potential options we will engage with relevant technical marine stakeholders and fisheries organisations to help inform the development and refinement of these options. The location of the offshore platform will be informed by the alignment of the interconnector cables and the proposed location of the wind farm schemes.

Tomorrow: offshore wind and Interconnectors in harmony

MPIs enable offshore wind and interconnection to work together as a combined asset.



Our consultation

Our consultation starts on Tuesday 14 September and will run for six weeks, closing on Tuesday 26 October. Our communication lines will still be open following this period and there will be more opportunities to comment on our proposals once these have been refined.

This consultation and our local information events are an important part of our pre-application consultation. Understanding what issues are most important for the local community is key, and the feedback gathered at these events will help us to shape our proposal going forward.

Community drop-in sessions

We are planning to hold public events at different locations across our consultation area. These events will complement our online consultation process and be a direct opportunity for you to view our plans, discuss them with members of the project team, and provide feedback on them.

Details of the local information events can be found below:

Tuesday 28 September - 4pm to 8pm -
Leiston Community Centre, King George's Avenue,
Leiston, Suffolk, IP16 4JX

Wednesday 29 September - 10am to 2pm -
Friston Village Hall, Church Road, Friston,
Suffolk, IP17 1PU

Thursday 30 September - 4pm to 8pm -
Thorpeness Pavilion, Thorpe Road,
Thorpeness, Suffolk, IP16 4FD

Friday 1 October - 10am to 2pm -
Saxmundham Market Hall, High St,
Saxmundham IP17 1AF

Community webinar events

We will also be holding community webinar events during our consultation period. You will be able to join by video call or phone to hear more from the project team and ask any questions you may have. These will be held on:

- **Thursday 7 October 2021**
from 10am to 12pm
- **Tuesday 12 October 2021**
from 6pm to 8pm

A detailed step-by-step guide for how to access our community webinars, along with webinar links and telephone dial-in details are available on our website: nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

Virtual exhibition

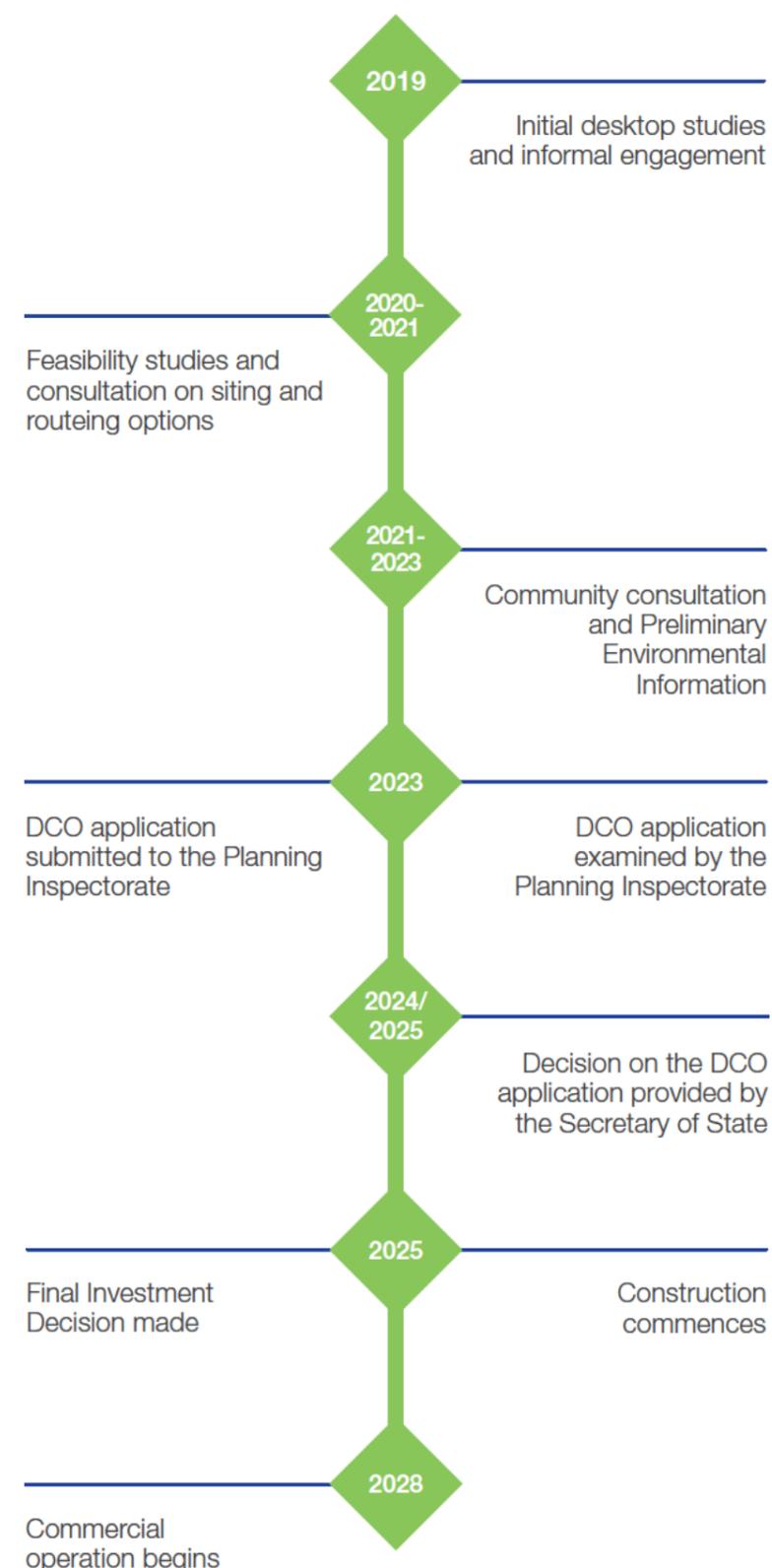
For anyone unable to attend our consultation events, we have created a virtual version which is accessible through our project website and contains the same information: nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

Have your say

You can access our consultation material and provide your views in the following ways:

- In person by attending one of our events
- Online via our project website
- By post by writing a letter or completing one of our feedback forms and posting it back to us free of charge to our Freepost address on the back page of this leaflet
- You can also email us, call us or write to us using the details on the back page of this leaflet

Indicative Timeline*



*Please note, all dates are indicative.

Contact us

Please don't hesitate to get in touch if you would like to find out more information about Nautilus Interconnector.

You can contact a member of our Community Relations Team to find out more by using the details below.



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For more information about Nautilus Interconnector please visit:
www.nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector

All image and graphics for illustrative purposes only.

For all sources, please visit our website or contact a member of our team.

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Nautilus Interconnector FAQs

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General

Who is National Grid Ventures?

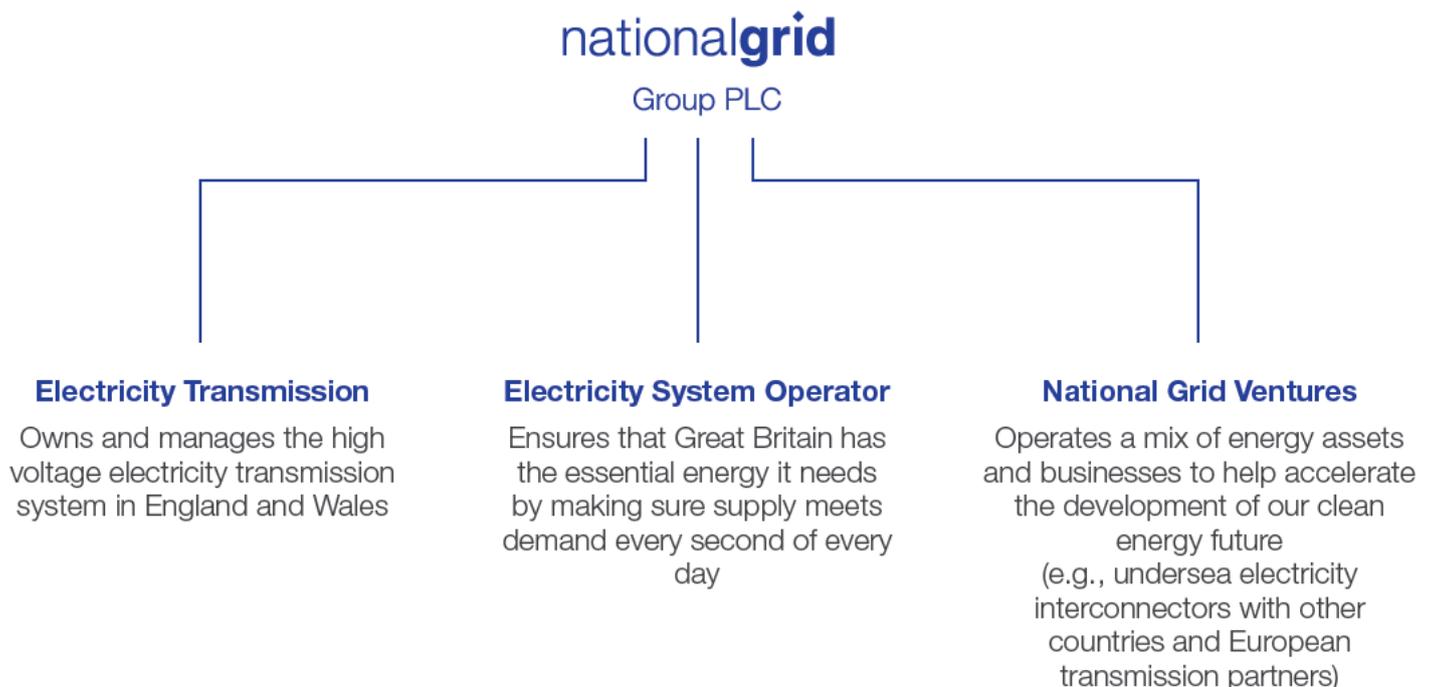
National Grid Ventures is the competitive division of National Grid plc. It operates outside of National Grid's core regulated businesses in the UK and US where it develops and operates energy projects, technologies, and partnerships to make energy cleaner, more secure and more affordable for consumers.

NGV's diverse portfolio of low carbon and renewable energy businesses includes subsea electricity interconnectors in the UK, and battery storage, wind and solar power in the US.

NGV's interconnector fleet gives Great Britain access to secure and affordable energy and will play a critical role in tomorrow's cleaner and smarter energy systems. NGV currently have three interconnectors in operation and three in construction. By 2030, 90 per cent of the electricity imported through these six interconnectors will be from zero carbon sources.

There are different National Grid electricity businesses operating in GB that have different roles

There are three distinct electricity business entities under the umbrella of National Grid plc in the UK, as detailed in the diagram below, all with different roles and responsibilities. The separation between NGV, National Grid Electricity Transmission (NGET) and National GridESO stipulates that NGV is treated the same way as any other energy project promoter.



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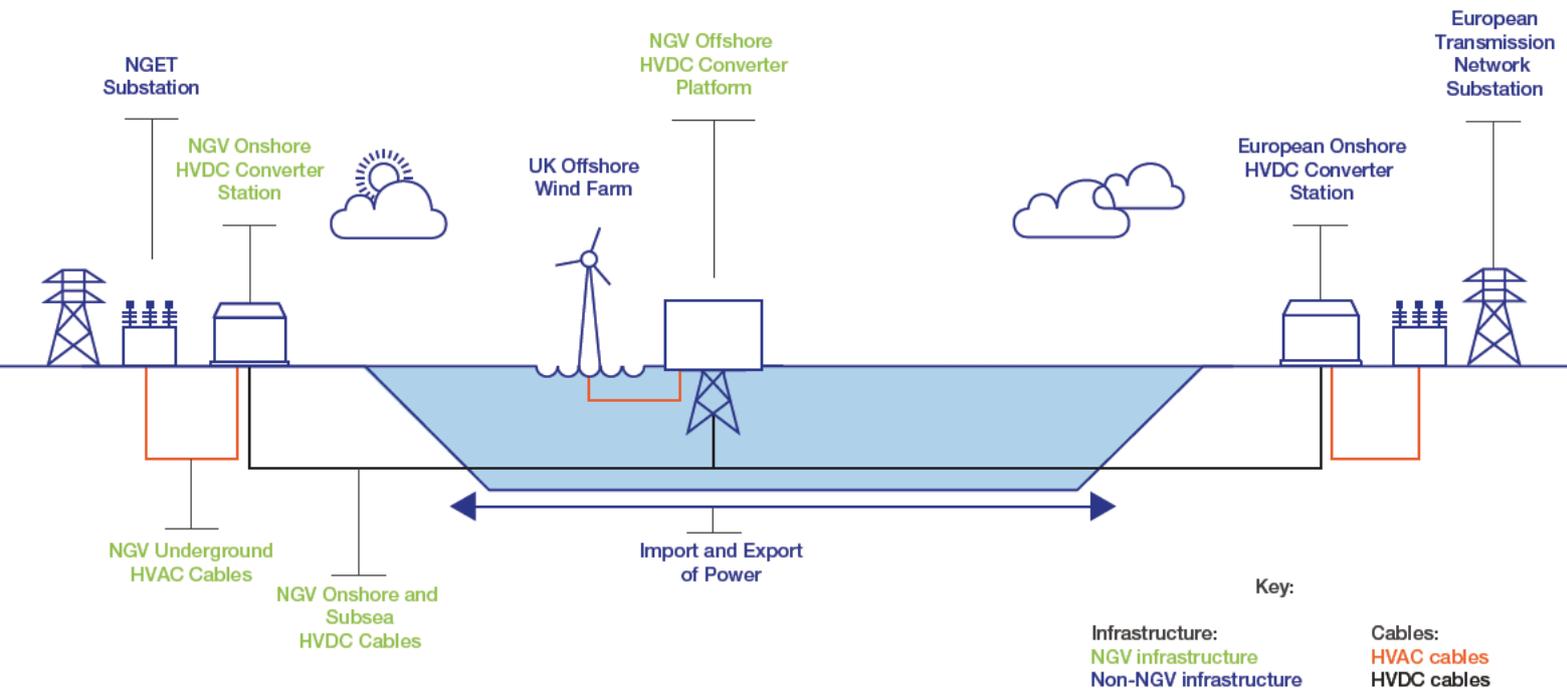
What is Nautilus Interconnector?

At National Grid Ventures (NGV), we are bringing forward plans for Nautilus, a new multi-purpose interconnector (MPI) that could supply enough electricity to power around 1.4 million UK homes.

Nautilus could connect up to 1.4 gigawatts (GW) of offshore wind to the transmission systems of Great Britain and Belgium through a subsea electricity cable called an interconnector. The project would include underground cabling works and onshore infrastructure, located in East Suffolk.

Nautilus will provide two functions in one project: connection of wind and interconnection between the transmission systems of Great Britain and Belgium. The 1.4 GW link between the two countries can facilitate a connection of up to 2.8 GW of offshore wind – with 1.4 GW importing to Britain and 1.4 GW exporting to Belgium. When the wind isn't using the capacity, Great Britain can either import or export up to 1.4 GW from/to Belgium.

As shown in the figure below, a MPI would connect offshore wind farms to an offshore converter station, potentially linking clusters of wind farms into a single connection point, before transporting this electricity to the transmission systems of two European countries through a subsea electricity cable called an interconnector. This would then connect to an onshore converter station at each end of the connection to transform high voltage direct current (HVDC) into high voltage alternating current (HVAC) so that it can be fed into the transmission network of each country.



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Is NGV supportive of an alternative and more co-ordinated solution to energy supply in East Suffolk?

NGV is supportive of the efforts to achieve greater co-ordination in energy infrastructure. NGV continue to promote and test alternative solutions with the UK Government and promoters at home and in Europe.

NGV believes that to achieve the UK Government's energy targets (40 GW by 2030 and 75 GW by 2050) there needs to be greater co-ordination of how wind and interconnector projects are connected. This is vital to ensure that the UK can meet both energy and environmental challenges and reduce the impact on coastal communities.

Since 2019 we have been engaging in the area with local authorities, parish and town councils and community groups across East Suffolk to gain a better understanding of their interests and concerns. From this engagement it has been made clear that there is a need for greater coordination and cooperation between energy developers in the region, in particular relating to connections to the electricity transmission network.

Developing Nautilus as a MPI rather than a traditional point-to-point interconnector is our first step in responding to this feedback. Going forward, throughout the consenting, development and construction process we intend to coordinate as far as possible with other developers in the area in order to best address the interests of the environment and local communities.

Who will be the decision-making authority for Nautilus Interconnector?

In March 2019, NGV requested that the Secretary of State for Business, Energy and Industrial Strategy (BEIS) exercise its powers under Section 35 of the Planning Act 2008 to deem that the proposed Nautilus Interconnector will be treated as a Nationally Significant Infrastructure Project (NSIP) and as a development requiring a Development Consent Order (DCO). This means that the final decision-maker for the project will be the Secretary of State.

The DCO regime will require NGV to undertake a thorough Environmental Impact Assessment (EIA) and consultation process prior to any application being submitted. NGV and the Secretary of State acknowledge that the DCO consent process will provide a single, unified consenting process with clear and fixed timescales for the development to engage with stakeholders and bring its application forward.



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Multi-purpose interconnectors

What is a multi-purpose interconnector (MPI)?

MPIs are subsea electricity cables which are installed between two countries connecting offshore wind farm/s to both markets. This technology marks an evolution from point-to-point interconnection and radially connected wind.

By combining offshore wind generation with interconnector capacity between GB and Belgium, Nautilus will reduce the amount of infrastructure required both onshore and offshore. In doing so we will be able to reduce the impact on the affected community and environment as well as delivering a pathway towards a more integrated offshore network.

At present, offshore wind and interconnectors operate alongside each other. MPIs will enable offshore wind and interconnectors to work together. This will help to:

- Support the UK to achieve its 40 GW of offshore wind by 2030 and net zero by 2050 climate targets.
- Reduce impacts on coastal communities and the environment by avoiding the need for every project to have its own separate connection infrastructure.
- Increase security of supply by ensuring energy flows from where it is being generated to where it is needed the most.
- Promote more affordable energy bills in the UK by providing access to the lowest priced energy between GB and Belgium.

Read more about National Grid's vision for MPIs by visiting: nationalgrid.com/our-businesses/national-grid-ventures/interconnectors-connecting-cleaner-future/multi-purpose-interconnectors

Will the onshore infrastructure be different for a MPI?

The onshore infrastructure for a MPI is no different to that of a point-to-point interconnector. However, by connecting with offshore wind farms at sea, it would avoid the need for additional offshore wind farm cables and other individual infrastructure such as onshore project substations, meaning the MPI would reduce the impact onshore as compared to two individual projects. With every offshore wind project connected offshore to the MPI, the amount of infrastructure necessary in both marine and terrestrial environments diminishes.

Why do we need interconnectors?

Interconnectors are making energy more secure, affordable and sustainable for consumers. Great Britain has experienced success from existing interconnectors which have connected energy between Great Britain, Belgium, France, Ireland and the Netherlands.

These projects have helped to lower electricity prices in Great Britain, increase the security of supply and stabilise energy in the Great Britain transmission network. Interconnectors are vital in making electricity networks more flexible and are increasingly needed to offset the lack of investment in substantial electricity generation plants in the UK, along with addressing the higher demand for cheaper wholesale energy from Europe.

Electricity normally flows from the market with lower prices to the market with higher prices. On average, UK electricity prices are higher than those in mainland Europe, which typically means that the UK benefits from receiving cheaper electricity.

If you would like to find out more about interconnectors developed by NGV and its European partners you can download NGV's interconnectors information pack [here](#).

Why use HVDC for interconnectors?

Interconnectors use HVDC lines. The link between the UK and Belgium will exceed 100 miles end to end. The use of HVDC cables to transport 1.4 gigawatts (GW) over this distance is proven to be more efficient for losses and will require a much smaller number of cables than HVAC.



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Connection point and transmission

Why East Suffolk?

We applied for a connection point for Nautilus to the National Grid ESO. National Grid ESO then undertook an appraisals process to identify a point of connection on its network for each application. This included an assessment of environmental, technical and cost factors, which concluded that East Suffolk was the best connection point. As a result of this process, NGV has grid connection agreements to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. The legal entity which holds the connection agreements with National Grid ESO is called National Grid Interconnectors Holdings Limited (NGIHL) – which is a NGV business.

Our connection agreement for Nautilus refers to an area rather than an exact location.

Further feasibility studies are being undertaken over the course of 2021, including due diligence on the options available for connection in the Leiston area in line with the connection agreements. While NGV have engaged in discussions with stakeholders and maintained a dialogue with the ESO, at no point has this translated into a confirmed connection at Friston.

Initial routing and siting work for Nautilus has been based on the reasonable assumption of a potential connection location at the proposed Friston substation. It is yet to be confirmed whether the proposed Friston substation presents a feasible connection point for Nautilus.

What does an interconnector need to do to connect to the onshore grid?

For Nautilus to connect to the proposed NGET substation at Friston, the proposed substation would require an extension.

NGV understand that typically the maximum land take required to facilitate extensions to NGET substations is approximately 1.3 hectares (3 acres) for each connection offered at a location.

Decisions on changes and upgrades to the National Transmission System (NTS) are made by NGET in its role as the Transmission Owner. NGV remain in dialogue with NGET to understand if any changes or upgrades may be required to the NTS as a result of NGV's connection agreements.

What is the difference between HVAC and HVDC?

HVAC stands for high voltage alternating current. HVDC stands for high voltage direct current.

HVAC technology is the principle means of power transmission in all modern power systems. The vast majority of all electrical power is generated, transported and consumed as alternating current. HVDC technology is an alternative to HVAC for point-to-point power transmission and may be appropriate in some circumstances for bulk power transfer over long distances or between different grids.

Most electricity is generated as alternating current, therefore it is necessary to convert the direct current back to alternating current for onward transmission in the national grid at a converter station.



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Working with other local projects

How are you working with other energy projects planned in East Suffolk?

We are already working closely with the other promoters in the area including ScottishPower Renewables and EDF as well as East Suffolk and Suffolk County Councils, and NGET. NGV regularly meet with all the promoters in the area, alongside East Suffolk Council and Suffolk County Council, at the Suffolk Energy Forum.

How is Nautilus working with the Offshore Transmission Network Review?

We have been working with the Department for Business, Energy and Industrial Strategy (BEIS) and the industry regulator, Ofgem, to provide our expertise into the emerging policy framework surrounding coordinated solutions for offshore transmission. This includes our membership on the working group for the Offshore Transmission Network Review (OTNR).

As part of the OTNR we have also made a submission to National Grid ESO which promotes Nautilus as a MPI.

Siting and routeing

How has the siting and routeing produced these search area and site options?

We began with a search area for potential converter station sites within five kilometres (km) of the proposed NGET substation in Friston. We looked at all of the known environmental features in this five km search area to identify areas which featured constraints that we would want to avoid if possible, such as environmentally designated sites, heritage assets, hydrology features, recreational areas, landscape designations, villages, towns, and existing and known infrastructure.

For potential landfall locations our search area consisted of coastline adjacent to this five km search area in order to keep the cable route as direct as possible and to limit the potential impact. This process included desk-based research and a series of ecological surveys.

We undertook a further assessment of these locations to evaluate and identify a shortlist of the most suitable converter station search areas, landfall site options and cable corridor options. Key criteria used for selecting the most suitable options included:

- The potential to affect the Suffolk Coast and Heath AONB and Heritage Coast
- Visual impacts
- Proximity to Public Rights of Way (PRoWs) and cycle routes
- Proximity to residential properties, existing infrastructure and future developments
- Impacts to local heritage and archaeological assets
- Ecologically designated sites and sensitive features
- Flood risk
- Conformance with Local Development Plan (LDP) policies

For our landfall site options, nearshore constraints were also considered including:

- Shipping and vessel activity
- Commercial fishing and recreational usage
- Marine archaeology



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Where will the project connect to in the scenario where EA1N and EA2 are not consented or a connection to the proposed Friston substation is not feasible?

We recognise that the Friston substation has not yet been consented. We participated in the Development Consent Order (DCO) Examinations for East Anglia One North and East Anglia Two as an Interested Party and continue to monitor the outcome. Scenarios depending on the outcome of the examination are being considered, including where an alternative connection point to the National Transmission System may be required. Parallel to our siting and routeing work, we are continuing to consider the potential coordination opportunities associated with our connection area. MPIs present the opportunity for coordination of multiple projects. For Nautilus this means both providing a connection opportunity for offshore wind farm/s (integration) and exploring the ability to co-locate with projects to reduce potential impacts both onshore and offshore (collaboration). Currently, our work involves exploring different scenarios for potential coordination.

This work is ongoing and we are not able to share further details during this consultation. However, the feedback you provide now will help inform our work on this.

If a connection at Friston is not considered achievable, we would need to discuss alternative sites and options available with National Grid ESO.



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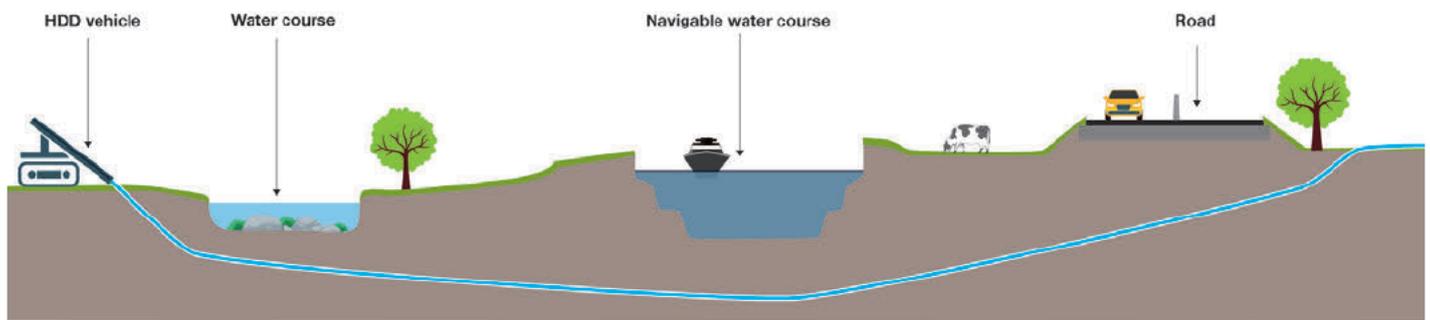
Cable installation

What are the differences between the crossing techniques of Horizontal Directional Drilling (HDD) and open cut?

Horizontal Directional Drilling (HDD) is a construction technique that involves drilling underneath particularly sensitive areas and infrastructure that the project may encounter along the cable route to lay the onshore cable with minimal disruption. This technique avoids the need for digging deep trenches and allows construction to operate through different ground conditions.

Open cut trench excavation offers an alternative method of cable installation which can be used instead of HDD, particularly in more rural areas and where there are no major obstacles. It consists of excavating a trench section-by-section as the cable is laid. This excavation is then backfilled once the cable laying is complete.

Typical HDD Construction



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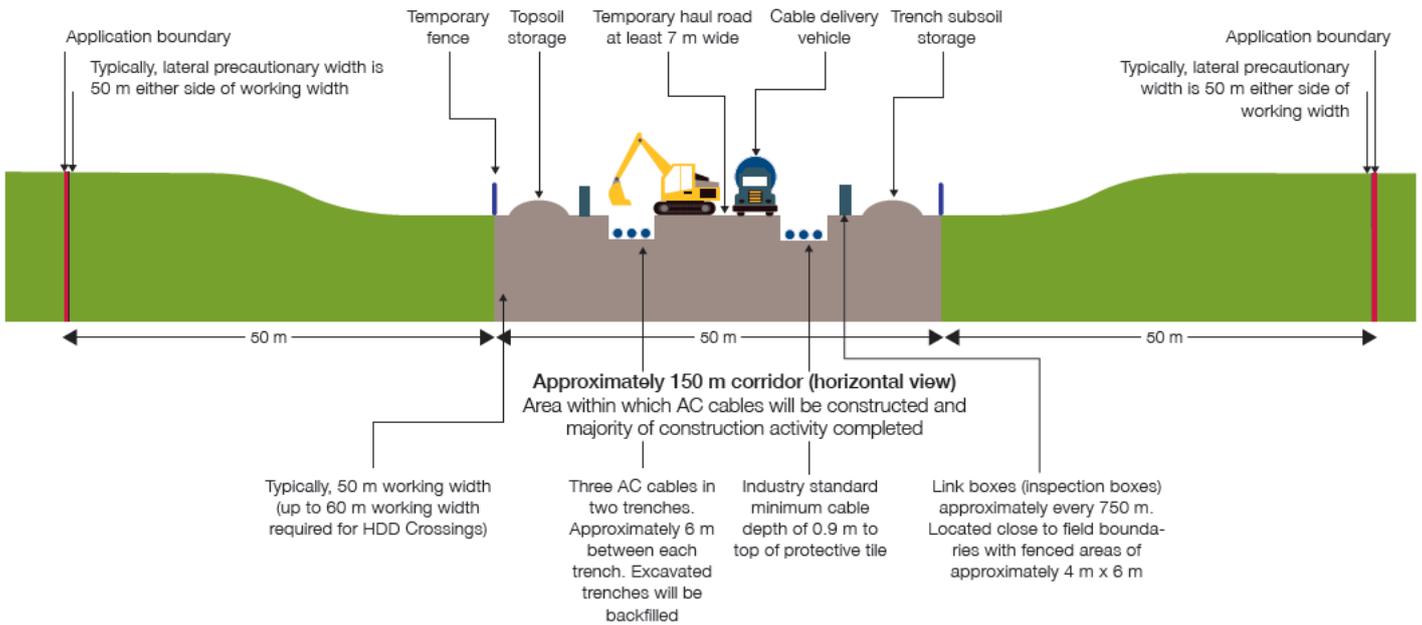
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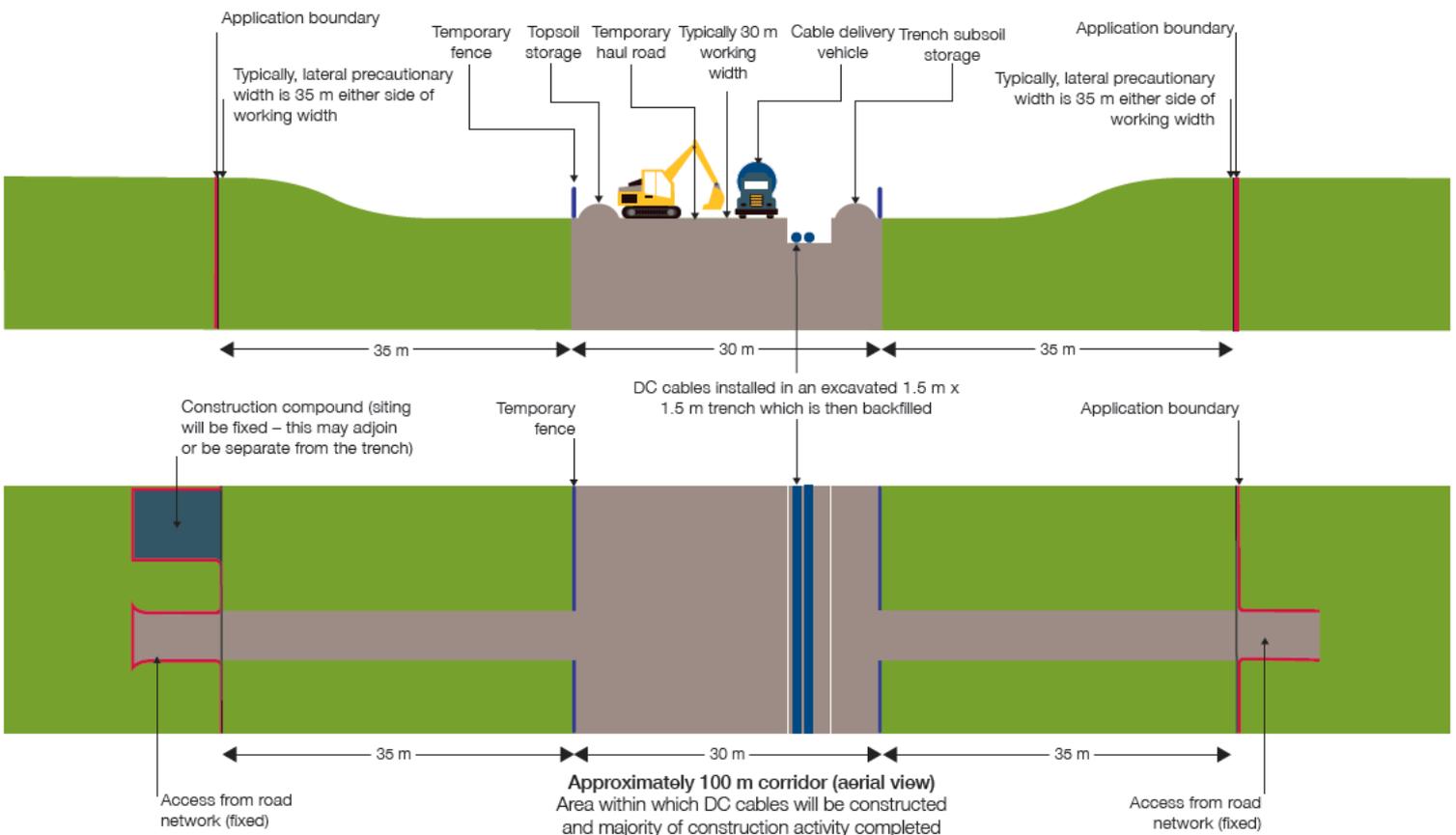
How do the construction of AC and DC cables differ?

Typical AC cable construction



This illustration is for illustrative purposes only and is intended to show the typical construction of AC cables for interconnectors in the UK

Typical DC cable construction



This illustration is for illustrative purposes only and is intended to show the typical construction of DC cables for interconnectors in the UK

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Can you use the same cable route as ScottishPower Renewables (SPR)?

The proposed Nautilus Interconnector and the East Anglia ONE North (EA1N) and East Anglia Two (EA2) offshore wind farm projects are different technologies being brought forward by different developers with different timeframes. This means Nautilus Interconnector is not able to share the same cables or cable trenches. There may be potential to locate the proposed cables within an appropriate distance from SPR's cable route which will be considered as NGV assess different options for cable routeing. 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. This is so that NGV can identify any opportunities for joint working and reduce any disruption. In some places, Nautilus may need to cross the cables for EA1N and EA2.

Whilst SPR has already selected its preferred route, Nautilus does not yet have a defined cable route (for either DC or AC cables), and it must undertake its own detailed environmental and technical assessment to progress its project routeing and siting options. NGV will work to reduce impacts on local communities and the environment where possible and will liaise and consult with communities and stakeholders when the project is ready to discuss the proposed cable route options.

How are the cables buried offshore?

The interconnector will comprise of HVDC submarine cables. These will be installed between the two respective landfall locations in Belgium and East Suffolk and, where possible, will be buried within the seabed. Where burial within the seabed is not possible, additional cable protection may be required such as the placement of rocks on top of the cable.

Landfall

Will there be any visible equipment at the landfall site?

Landfall is where the subsea cables are brought onto the land and are connected to the onshore cables. As all the cables will be buried underground at the landfall site, very little will be visible once works are completed, although there may be some relatively small-scale equipment visible above ground. A kiosk type structure (similar to a telephone exchange) may be required at the landfall location to boost the signal for the subsea fibre optic communication system. It is too early to confirm if this would be required at this stage.

Cable joint bays will need to be made at sections along the route during installation. Cable joint bays will be buried for the HVDC cables and will likely require a manhole cover for operations and maintenance access, these manhole covers may require fencing. The manhole covers would be visible above ground. Joint bays on the HVAC cables will require above ground link boxes (see typical AC cable construction figure on page 9).

Why can landfall location E not be discounted?

While Landfall E has not been discounted, it is heavily constrained from an onshore perspective. Landfall E is located within an Important Bird Area (IBA), RSPB reserve and Site of Special Scientific Interest (SSSI). It is also located close to a Special Protection Area (SPA) and County Wildlife Site. These ecological features present substantial siting and routeing challenges. As such, Landfall E is not preferred from an onshore perspective.

However, due to environmental features and technical constraints in the marine environment we need to consider landfall options from an offshore perspective in order to confirm that one or more of the landfall options that have been identified are achievable. We will also consider any engineering measures which could reduce potential effects onshore if it emerges that there is a need for Landfall E to be progressed.



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Converter station

How big is the converter station for Nautilus Interconnector?

Nautilus Interconnector is at the very early stages of development. The design for the converter station has not yet been developed. A typical footprint for a converter station covers an area of five hectares (12 acres) with height of up to 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

NGV is constantly challenging its supply chain to bring down the size of converters. The final design of the converter station will be influenced by a thorough consultation process with the local community and other stakeholders, as well as through collaboration with the supply chain.

Why does the converter station need to be within five km of the substation?

The most efficient technical solution is to locate the converter station as close to the substation extension bays as possible – although this is not always feasible. This reduces the length of the HVAC cable circuits needed to connect the converter station to the substation. Longer HVAC cable routes result in reactive power transmission losses which require extra equipment in the converter station, such as shunt reactors, to compensate these losses. A five km radius reduces the likelihood of needing this equipment.

HVAC cable routes typically require a larger working width than that of HVDC cables. A longer HVAC cable route between the converter station and the NGET substation therefore has the potential to impact a larger area. Bundled underground cables will need to be installed between the converter station and the NGET substation. Therefore, minimising the distance between the infrastructure helps reduce disruption and the land take required for cable burial.

Can the converter station be buried?

There are a number of environmental, technical and cost factors which must be considered when designing the converter station, and partially or entirely burying the building presents significant challenges relating to keeping the building free from water and moisture.

NGV is constantly challenging its supply chain to consider, develop and review innovative engineering and design techniques. Further work is being undertaken to assess the feasibility of burying converter stations. Site specific constraints and safety will also have an impact on the feasibility of burying a converter station. Converter stations have not previously been buried due to concerns over water ingress into buildings accommodating electrical infrastructure, concerns over the effectiveness of firefighting and ventilation systems, and the additional associated costs. NGV would be required to undertake a cost benefit analysis to assess additional cost against potential benefits in order to meet Ofgem requirements.

The final design of the converter station will be consulted on with the community in detail before submitting any application for a Development Consent Order (DCO). This will include the opportunity to provide feedback on items such as visual appearance and landscaping.

Will the converter station be noisy?

The converter station will be designed to reduce noise. Noise modelling assessments will be undertaken as part of the EIA process. Noise levels will be consulted on with environmental health bodies and the local authority to ensure that any noise does not exceed unacceptable levels.



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Offshore

What is included in the project offshore?

Offshore components for Nautilus will include:

- Offshore converter station platform/s
- A submarine high voltage direct current (HVDC) interconnector

There are a number of factors which will influence the infrastructure required in the marine environment including ongoing discussions with the supply chain, technical assessment and discussions with offshore wind farm developers.

What will the offshore converter station platform/s look like?

The design and configuration of the offshore HVDC converter station platform is still in its early stages. The approximate maximum dimensions for an offshore HVDC converter station could be 110 metres in length and 80 metres wide, with a height of 45 metres. Note that the converter station will be installed on foundations (jacket) elevating it above the water surface and the height of the jacket, and therefore total platform structure will depend on water depth at the chosen location.

The aim is to site the offshore HVDC converter in proximity to offshore wind and so we would anticipate this to be at least 20 km from the coast.

If Nautilus connects more than one offshore wind farm then it may be necessary to have two separate offshore converter platforms in order to reduce the length of cabling connecting the offshore wind farms. This would be subject to further engagement with stakeholders and relevant offshore wind farms.

Our engagement with engineering specialists is ongoing as we continue to discuss and refine what the detailed infrastructure requirements are in the offshore marine environment.

The location of the offshore platform will be informed by the alignment of the interconnector cables and the proposed location of the wind farm schemes.



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Environment

How will the impact on the environment be considered?

NGV will be undertaking an Environmental Impact Assessment (EIA) process to ensure that matters relating to the environment are considered when developing the proposals for Nautilus Interconnector. An EIA is a legal requirement for some developments and is strictly regulated. A wide range of environmental subjects will be taken into consideration including traffic, landscape and visual impact and ecology. The results of these assessments will be consulted on in a Preliminary Environmental Information Report (PEIR), before being refined and submitted in an Environmental Statement (ES) which will form part of the DCO application.

Project timeframes

When will the project be completed?

Nautilus Interconnector is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision by NGV for the project is planned for 2024. Following this, construction will commence, and the project could be operational by 2028.

What does Brexit mean for Nautilus Interconnector?

NGV has undertaken a thorough analysis of potential risks relating to Brexit, and the results of this analysis highlight that electricity Interconnectors will be able to operate post-Brexit under any outcome.

NGV is confident that the energy markets in the UK, France, Netherlands, Belgium and Norway will continue to operate as they do now. NGV interconnectors will continue to have the right export and import power to and from those markets.



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The Planning Process

Nautilus has been classified as a Nationally Significant Infrastructure Project (NSIP) by the Secretary of State for Business, Energy and Industrial Strategy (BEIS). That means that we will be following the Development Consent Order (DCO) process and the final decision-maker for the project will be the Secretary of State for BEIS.

Our project must therefore apply for a DCO through the NSIP planning process. The DCO application will be dealt with by the Planning Inspectorate, the agency responsible for managing the examination process for NSIPs. It will then, if accepted, be examined by an independent Examining Authority Panel, who will make a recommendation to the Secretary of State (SoS) for Business Energy and Industrial Strategy (BEIS). Finally, the SoS will review and comment on this before making a decision on whether to grant a DCO.

We have been engaging with local authorities and are now asking for feedback as part of our non-statutory community consultation. This feedback will help to shape our proposals for Nautilus before we submit our DCO application.

As part of our DCO application we will submit a Consultation Report which records and reports all of the feedback received, and how our final application has regarded this. We will also publish an interim Consultation Summary following our consultation, summarising the feedback received.

We will continue to engage with the local community and key stakeholders moving forward, including a formal statutory consultation on refined proposals for Nautilus, ahead of a DCO application submission.

Indicative Timeline*



* More information and guidance on this process can be found at: <https://infrastructure.planninginspectorate.gov.uk/>



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Environmental Impact Assessment (EIA)

The purpose of EIA is to identify and reduce the potential for significant environmental effects arising from the construction, operation and decommissioning of a development. This information is then presented in an Environmental Statement (ES), which will be submitted as part of our Development Consent Order (DCO) application. This will assist regulators in the decision-making process.

Following the refinement of both our onshore and offshore proposals, extensive environmental surveys and studies will then be undertaken as part of the EIA process and a range of statutory consultees, stakeholders and local community will be consulted. As part of this process, NGV will prepare a request for an EIA Scoping Opinion from the Planning Inspectorate to define the scope, extent and approach of specialist environmental surveys and assessment to inform a Preliminary Environmental Information Report (PEIR) and an Environmental (ES).

Scoping Report

A Scoping Report will be submitted to the Planning Inspectorate. This will present the development proposals and will describe how we will assess any potential impacts to the existing environment. The feedback received on this document from the local planning authorities and statutory consultees will result in a Scoping Opinion from the Planning Inspectorate, which will be made publicly available.

It is anticipated that that Scoping Opinion Request will be submitted in Q1/Q2 2022. Engagement and consultation feedback will be collated and considered in the refinement of the scheme through the EIA process, prior to submitting the DCO application.

Preliminary Environmental Information Report (PEIR)

The PEIR will build upon the findings from the earlier scoping documents, as well as the feedback received through consultation. It will incorporate the findings of the surveys and environmental assessments that have been carried out. This will enable consultees to develop an informed view of the potential impacts Nautilus may have on the local environment. Copies of these reports will be made available a later stage of statutory consultation.

Environmental Statement (ES)

The ES will advance the content of the PEIR and will incorporate the responses from the consultation and results of the surveys undertaken. It will also describe any changes to the project and any mitigation measures proposed to be implemented. The ES will form part of the DCO application for submission.



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EuroLink

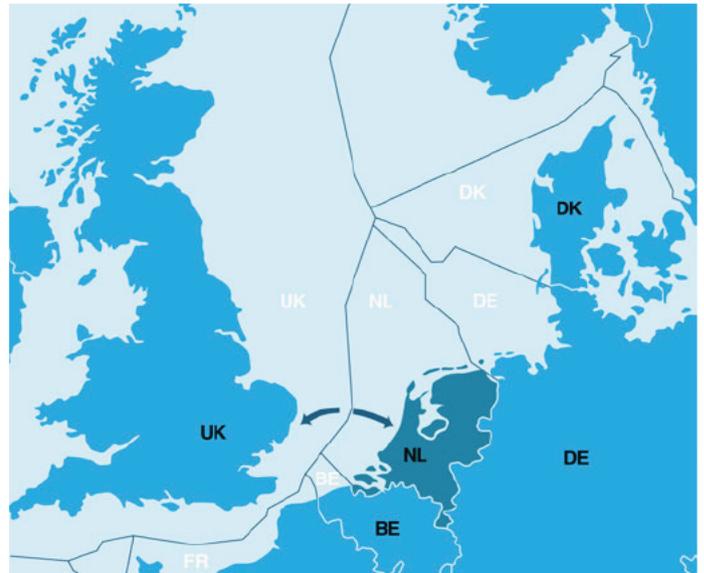
In addition to Nautilus, we are also bringing forward proposals for another multi-purpose interconnector, currently known as EuroLink, to provide a connection between Great Britain and the Netherlands that could provide enough electricity to supply around up to 1.8 million UK homes. If built, EuroLink could unlock up to 1.8 GW of offshore wind and connect this to the transmission systems of Great Britain and the Netherlands through a HVDC electricity link. EuroLink is a completely separate project to Nautilus and as such standalone consultation and engagement on it will follow.

Our grid connection agreement with the National Grid Electricity System Operator (ESO) for EuroLink is the same as our grid connection offer for Nautilus - to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network in Suffolk, provisionally referred to as 'Leiston 400kV'.

We are currently undertaking desk-based feasibility assessments for EuroLink. As our proposals for EuroLink develop, we will continue to engage with East Suffolk Council, Suffolk County Council and other developers in the area, together with technical and non-technical stakeholders and the local community to inform our work. An important aspect of this will be seeking to reduce, minimise and mitigate any potential cumulative impacts which may arise.

National Grid Ventures has signed a Cooperation Agreement with TenneT, the Dutch Transmission System Operator (TSO) to bring forward proposals for EuroLink. The development would be the first of its kind for the UK and the Netherlands in the North Sea.

Harnessing the full potential of offshore wind will play a vital role in decarbonising European economies and societies by 2050. The UK and the Netherlands have both established ambitious targets to expand offshore wind capacity in the North Sea, with the UK government recently announcing it was targeting 40 GW by 2030, whilst the Dutch have targeted 11.5 GW by 2030 and another increase of 20-40 GW by 2050. Delivering such large-scale offshore wind growth efficiently will require significant amounts of new infrastructure and close cooperation between countries around the North Sea.



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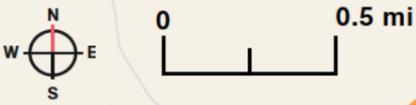
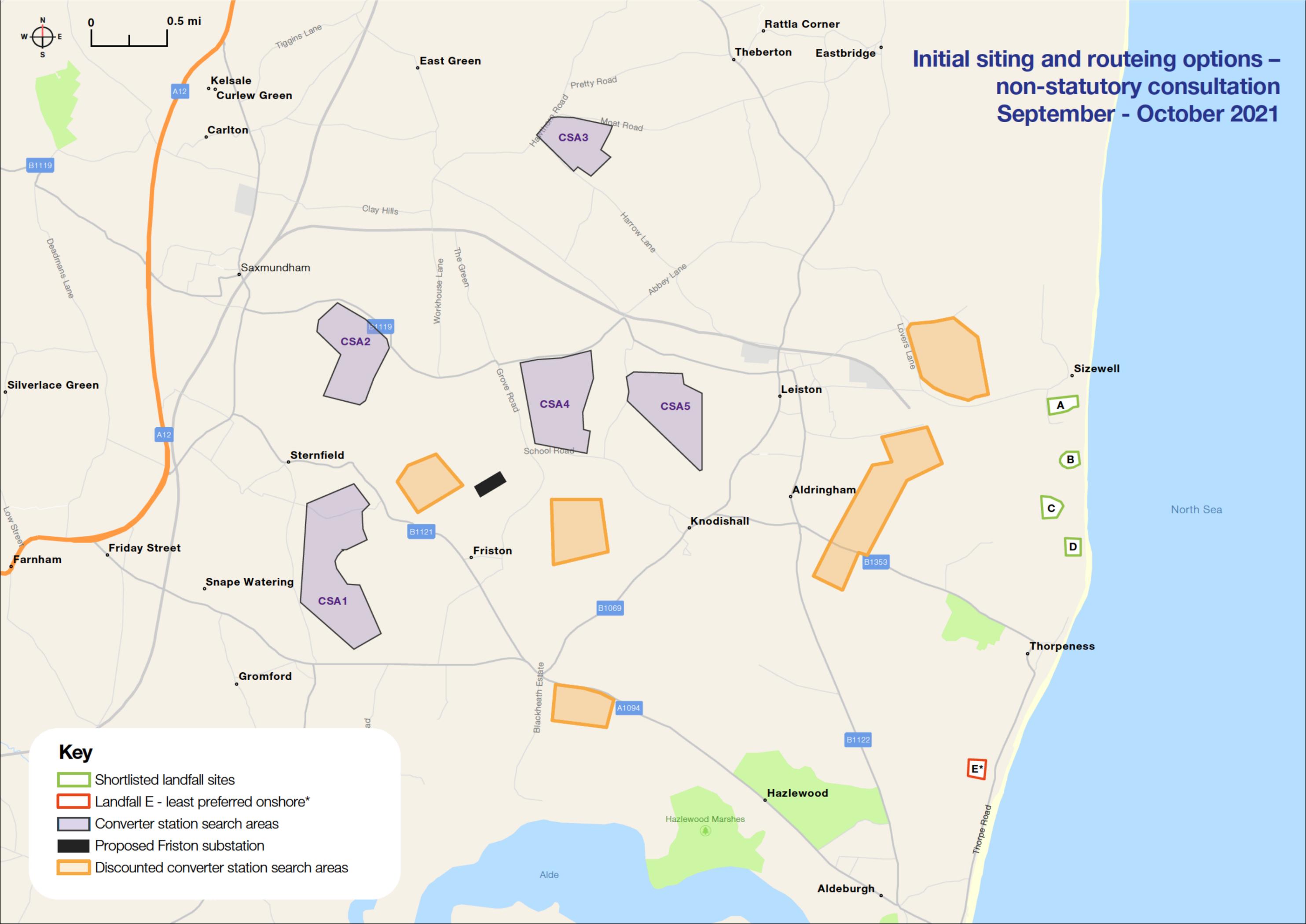
Initial siting and routeing options – non-statutory consultation September - October 2021



Key

- Landfall location options
- Landfall E - least preferred onshore*
- Northern cable route corridor
- Southern cable route corridor
- Shared route for Northern and Southern corridor
- Central cable route corridor
- Landfall E cable route corridor
- Converter station search areas
- Friston substation
- Cable corridors for grid connection

Initial siting and routeing options – non-statutory consultation September - October 2021



Key

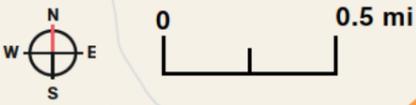
- Shortlisted landfall sites
- Landfall E - least preferred onshore*
- Converter station search areas
- Proposed Friston substation
- Discounted converter station search areas

North Sea

Alde

Hazlewood Marshes

Thorpe Road

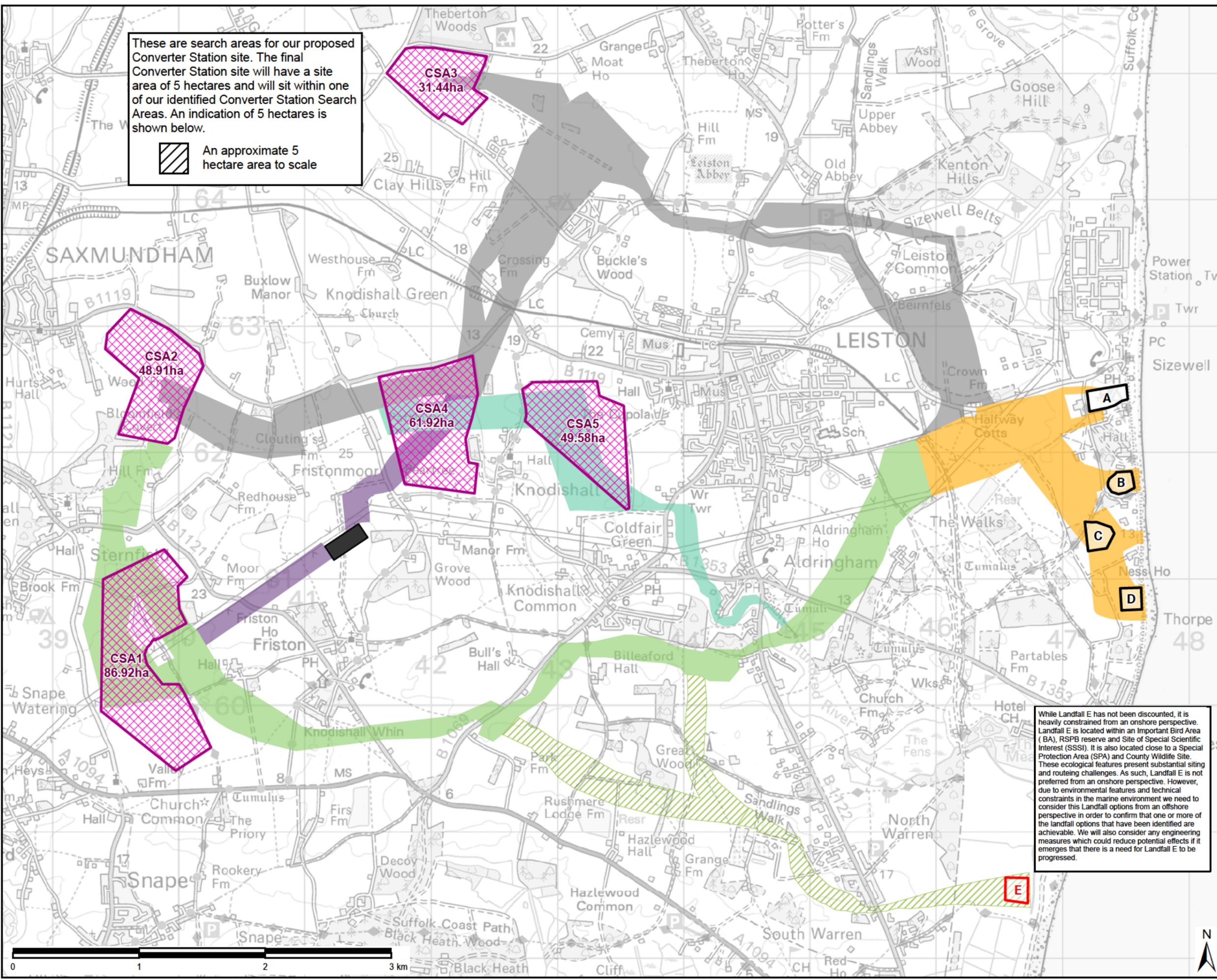


These are search areas for our proposed Converter Station site. The final Converter Station site will have a site area of 5 hectares and will sit within one of our identified Converter Station Search Areas. An indication of 5 hectares is shown below.



An approximate 5 hectare area to scale

- LEGEND**
-  NGET Substation at Friston
 -  Landfall Location Option
 -  Landfall Location Option E
 -  Nautilus converter station search areas
- Cable Routes**
-  Northern Cable Route Corridor
 -  Southern Cable Route Corridor
 -  Central Cable Route Corridor
 -  Shared Route for Northern and Southern Corridor
 -  Cable Corridors for Grid Connection
 -  Landfall E Cable Route Corridor



While Landfall E has not been discounted, it is heavily constrained from an onshore perspective. Landfall E is located within an Important Bird Area (IBA), RSPB reserve and Site of Special Scientific Interest (SSSI). It is also located close to a Special Protection Area (SPA) and County Wildlife Site. These ecological features present substantial siting and routing challenges. As such, Landfall E is not preferred from an onshore perspective. However, due to environmental features and technical constraints in the marine environment we need to consider this Landfall options from an offshore perspective in order to confirm that one or more of the landfall options that have been identified are achievable. We will also consider any engineering measures which could reduce potential effects if it emerges that there is a need for Landfall E to be progressed.

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Purpose of Issue:
PUBLIC CONSULTATION

Client:
nationalgrid ventures

Project Title:
NAUTILUS INTERCONNECTOR

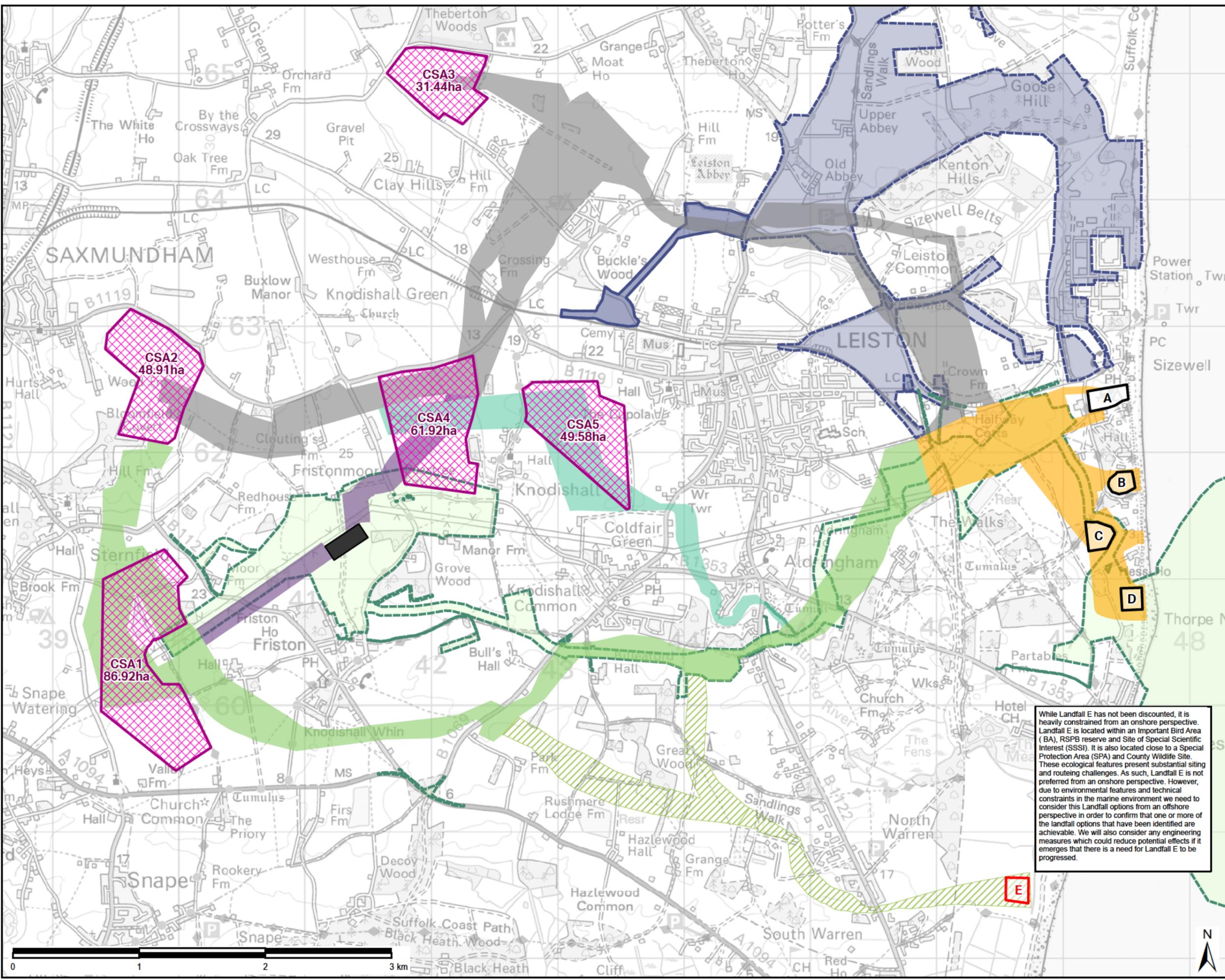
Drawing Title:
NAUTILUS ONSHORE SITING AND ROUTING OPTIONS FOR PUBLIC CONSULTATION

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- LEGEND**
- NGET Substation at Friston
 - Landfall Location Option
 - Landfall Location Option E
 - Nautilus converter station search areas
 - EA1N and EA2 Order Limits
 - Sizewell C Order Limits
 - Cable Routes**
 - Northern Cable Route Corridor
 - Southern Cable Route Corridor
 - Central Cable Route Corridor
 - Shared Route for Northern and Southern Corridor
 - Cable Corridors for Grid Connection
 - Landfall E Cable Route Corridor

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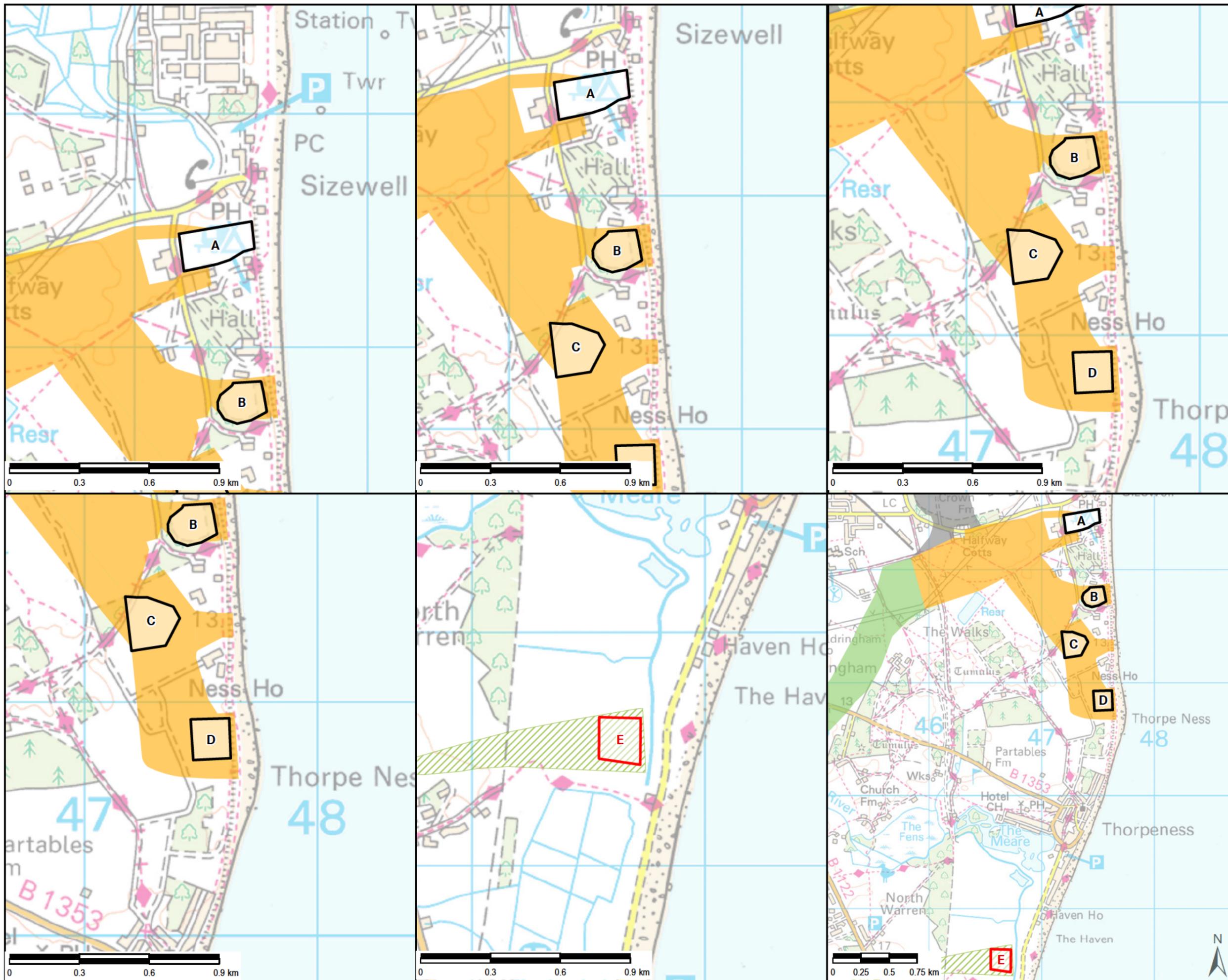
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NAUTILUS ONSHORE SITING AND ROUTING OPTIONS WITH EA1N AND EA2 ORDER LIMITS

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 - Landfall Location Option
 - Landfall Location Option E
- Cable Routes**
- Northern Cable Route Corridor
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Drawing Title:
NAUTILUS: LANDFALL OPTIONS FOR PUBLIC CONSULTATION

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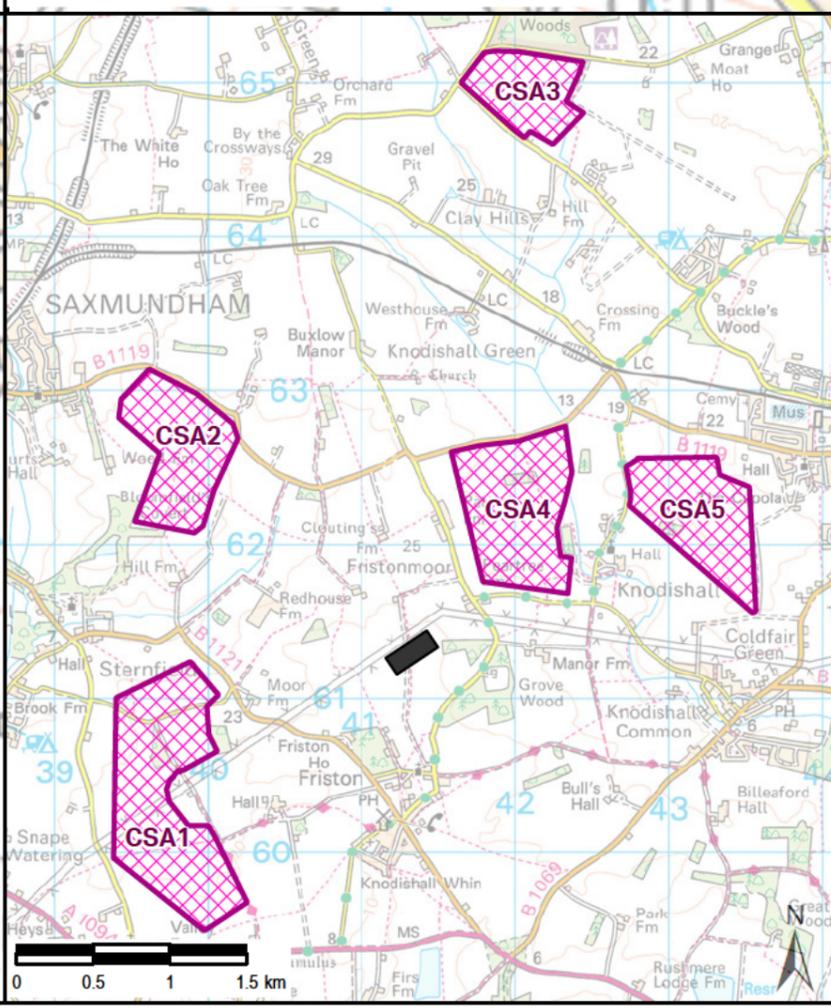
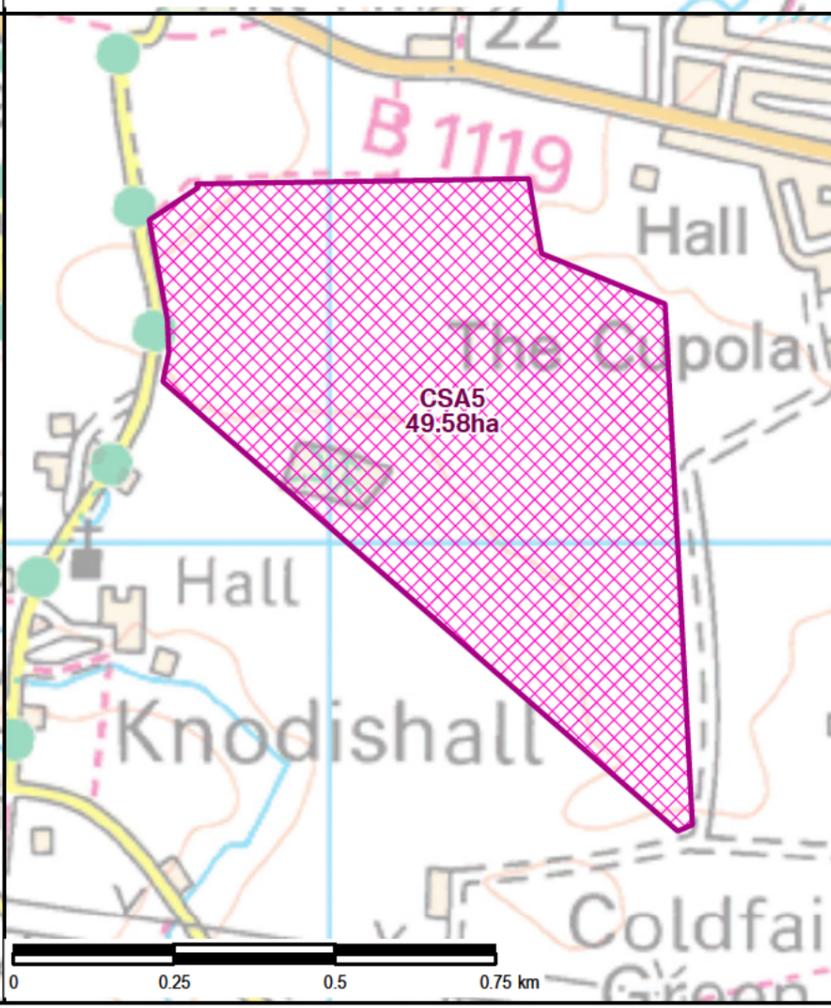
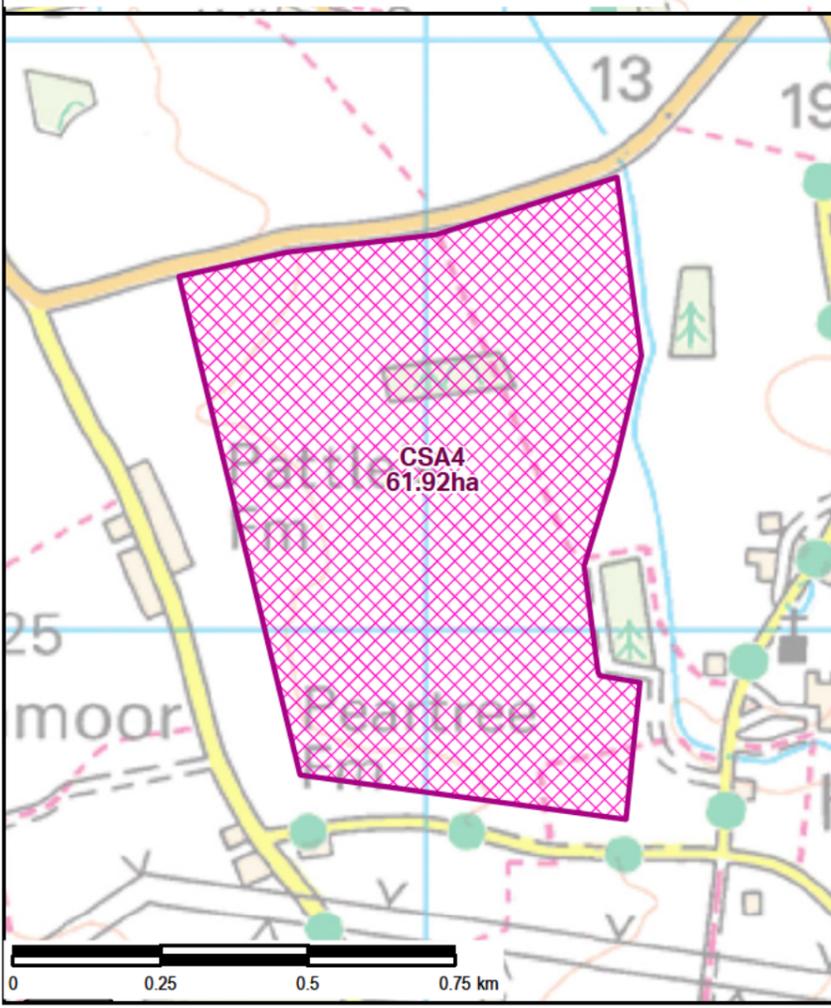
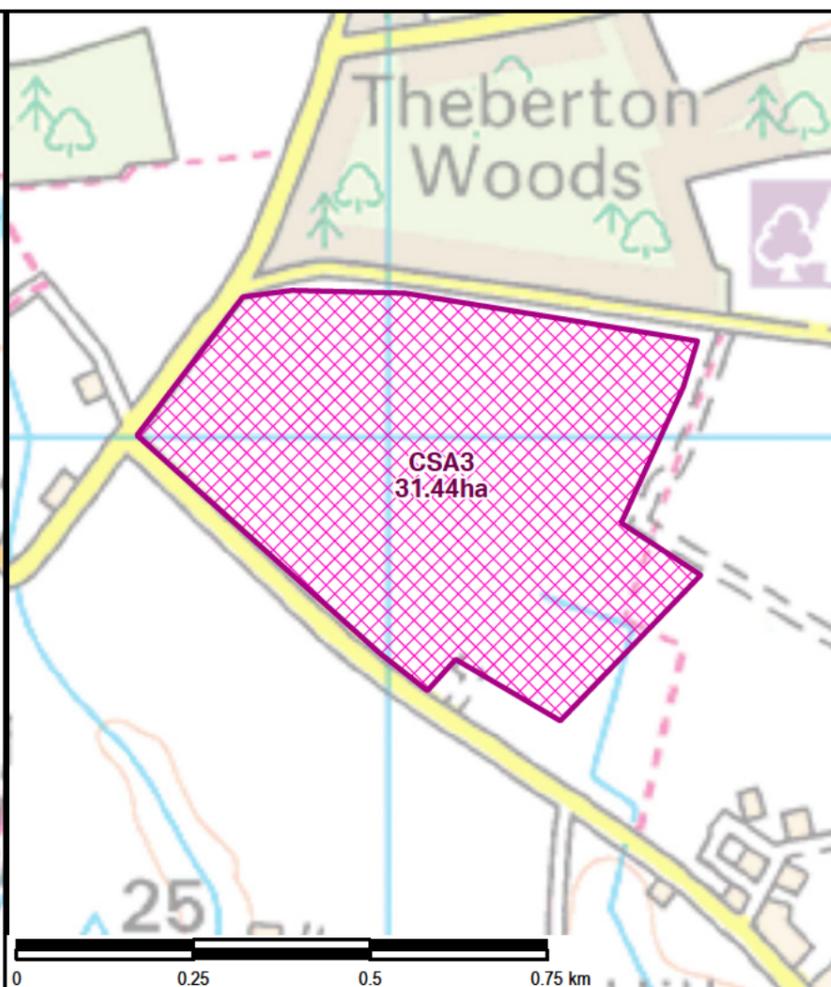
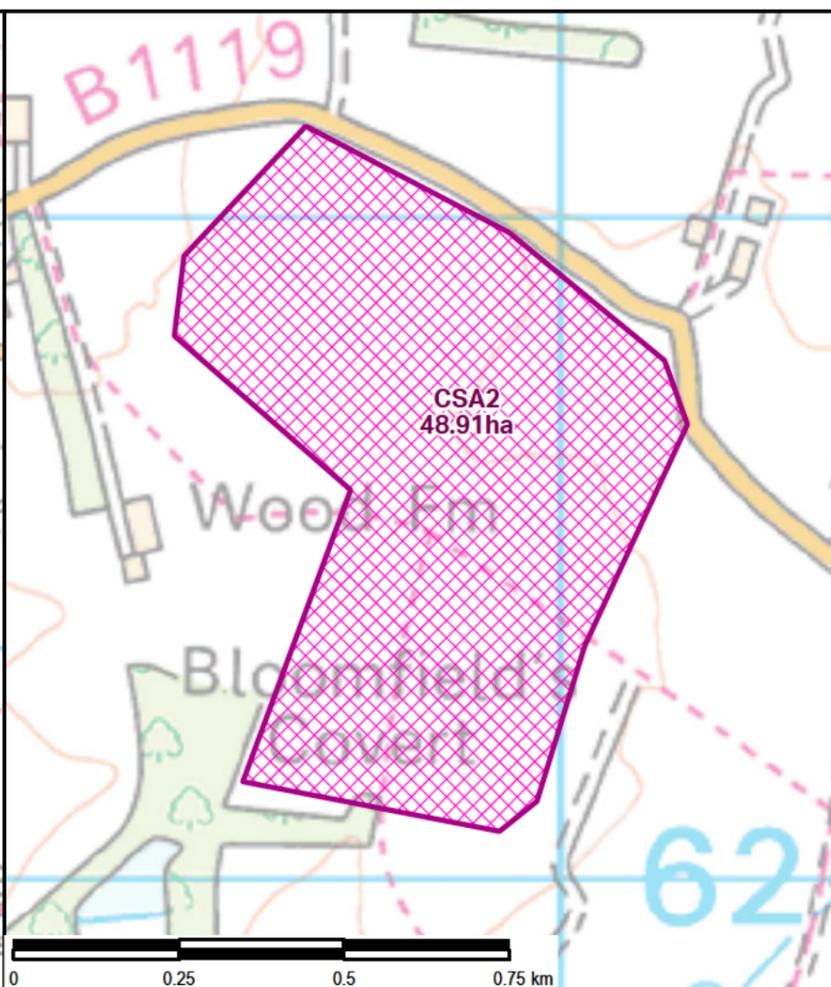
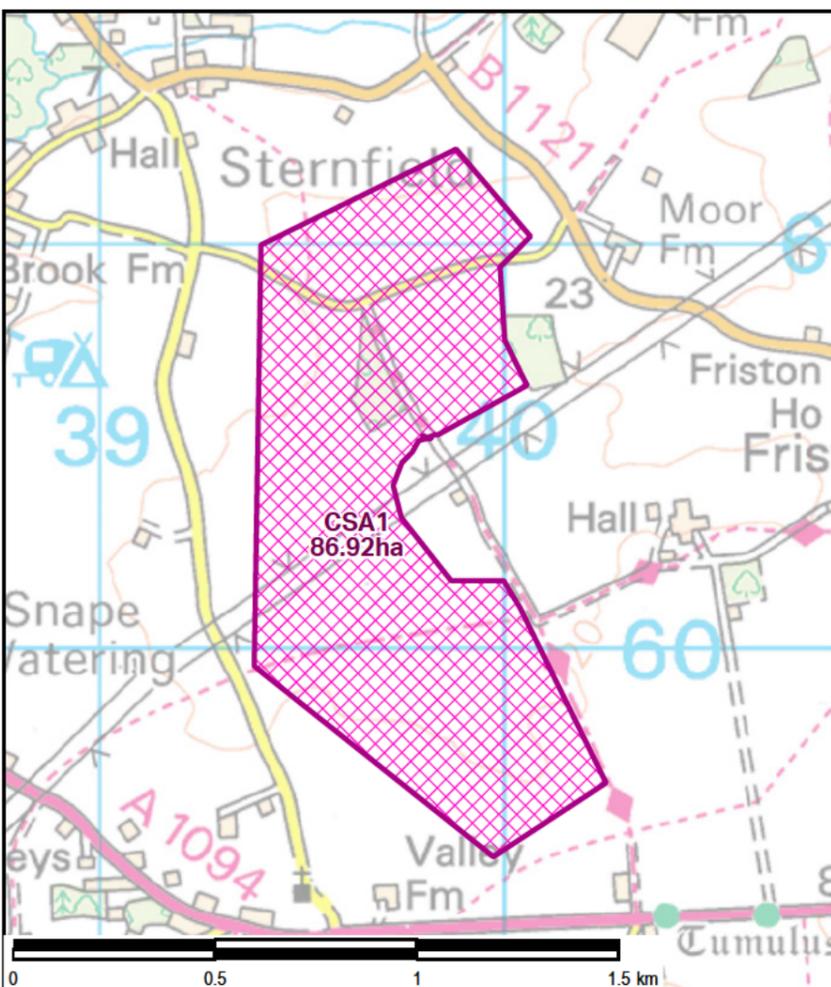
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LEGEND
 NGET Substation at Friston
 Nautilus converter station search areas



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Project Title:
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Drawing Title:
NAUTILUS: SHORTLISTED CONVERTER STATION SEARCH AREAS FOR PUBLIC CONSULTATION

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FIGURE 4

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These are search areas for our proposed Converter Station site. The final Converter Station site will have a site area of 5 hectares and will sit within one of our identified Converter Station Search Areas. An indication of 5 hectares is shown below.



An approximate 5 hectare area to scale

- LEGEND**
-  NGET Substation at Friston
 -  Landfall Location Option
 -  Landfall Location Option E
 -  Nautilus converter station search areas
 -  Cable Routes
 -  IBA
 -  RSPB Reserves
 -  SAC
 -  SPA
 -  Heritage Coast
 -  AONB

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Drawing Title:
NAUTILUS ONSHORE SITING AND ROUTING OPTIONS WITH HIGH LEVEL ENVIRONMENTAL CONSTRAINTS

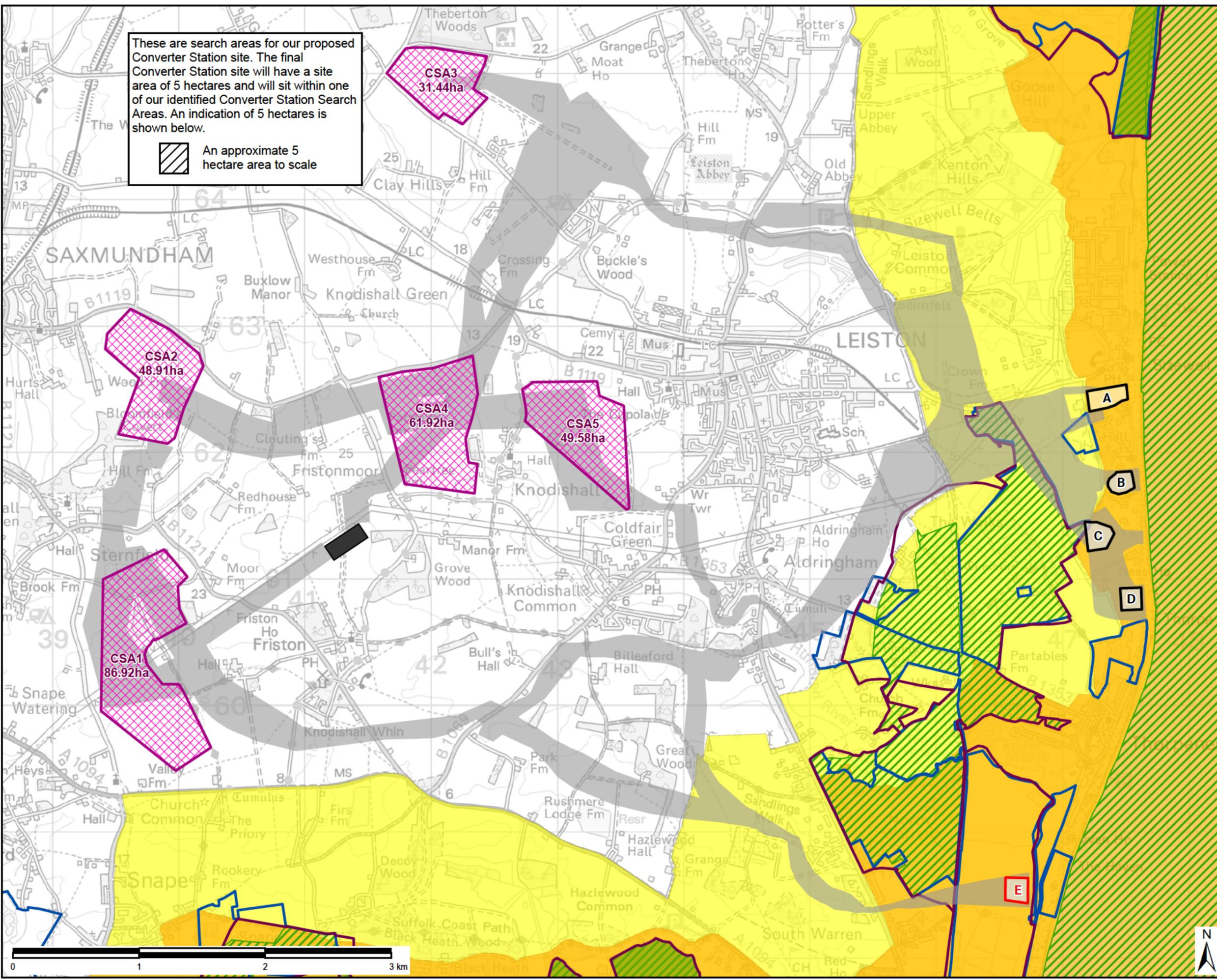
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NAUTILUS MULTI-PURPOSE INTERCONNECTOR

Marine Environment Information

Drawing No: P2433-ENV-L-001

C

Legend

- Offshore Study Area
- Potential Nautilus Landfall Location
- Landfall A - D
- Landfall E - Least Preferred Onshore
- + Munitions Dumpsite
- UK Offshore Wind Farm Sites**
- ✈ Existing
- ✈ Proposed
- Territorial Water Limit
- Port/Harbour Area
- Traffic Separation Area
- Marine Aggregates Extraction
- Planned and Existing Infrastructure
- Southern North Sea SAC
- Marine SAC



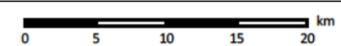
NOTE:

It is the intention that the MPI routing will go directly from GB to Belgium and will not cross any other territorial waters

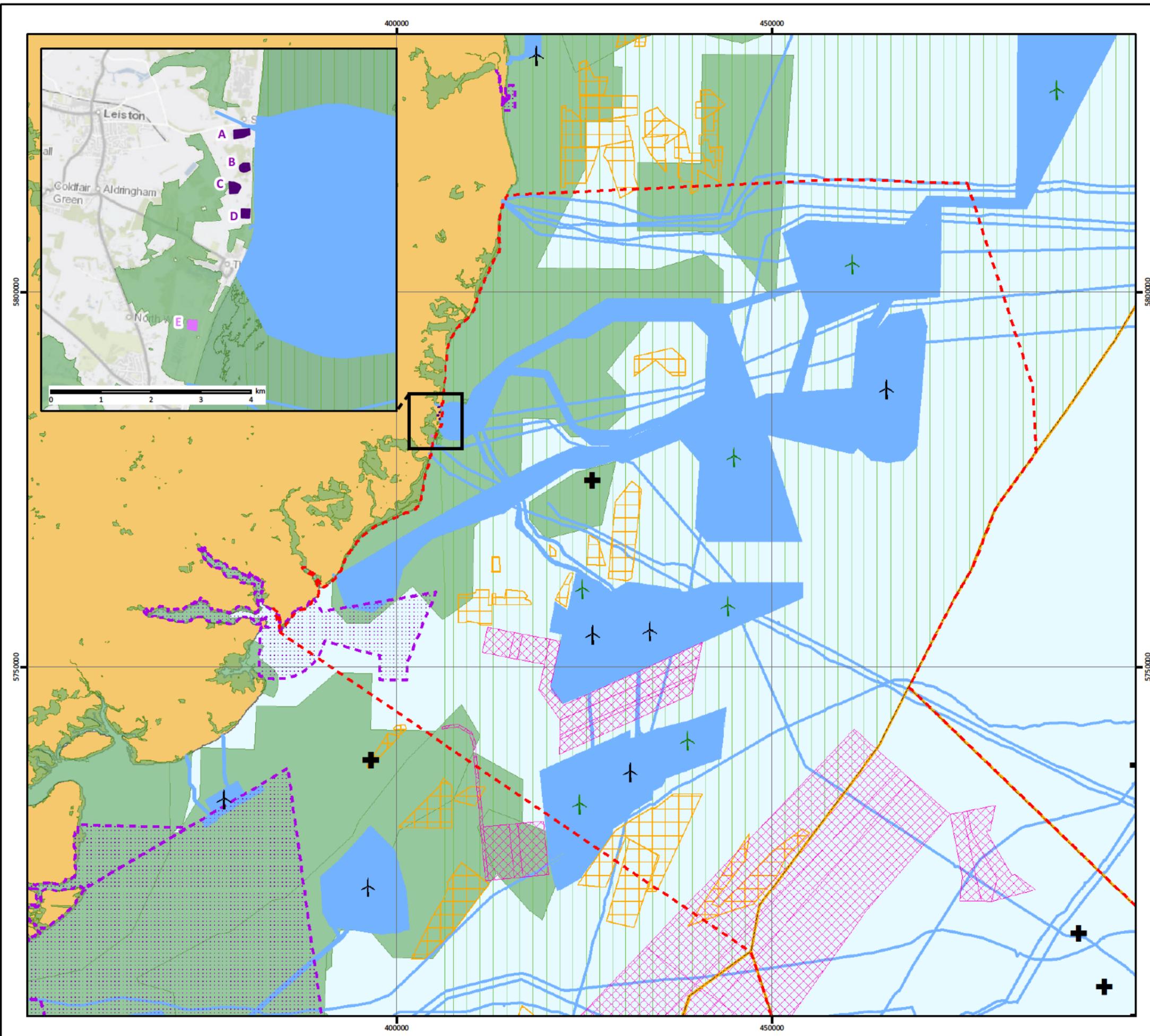


NOTE: Not to be used for Navigation

Date	02 September 2021
Coordinate System	WGS 1984 UTM Zone 31N
Projection	Transverse Mercator
Datum	WGS 1984
Data Source	TCE; JNCC; NE; KISCA; OGA; CEFAS; UKHO; OSOD; MarineRegions; ESRI;
File Reference	J:\P2433\Mxd\03_ENV\ P2433-ENV-L-001.mxd
Created By	Chris Dawe
Reviewed By	Emma Langley
Approved By	Jackson Harris



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A Guide for Attending our Webinar

Overview

You have been invited to attend the community consultation webinar on Nautilus Interconnector project on **Thursday 7 October 2021**. This document provides you with a step-by-step guide to accessing the webinar.

The webinar will be conducted in a moderated Q&A format. Your audio and video will not be available to be heard or seen by anyone attending the webinar. Questions are submitted via the Q&A button on the bottom of your screen.

All questions go through to a member of our team who will manage and collate them all to then be answered by a member of the team after the presentation.

Please note the presentation will begin at **10am**, so you are advised to join slightly before, if possible. You are free to leave and re-join as many times as possible whilst the webinar is ongoing.

Step-by-step guide to joining the webinar

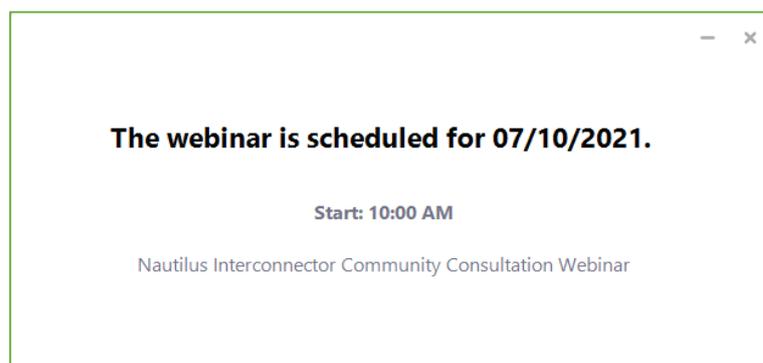
1. To join the webinar please click on the corresponding link, or enter the URL directly into your browser:
 - **Thursday 07/10/2021, 10am**
<https://us02web.zoom.us/j/85004820902>
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3. If you are using your mobile device (smart phone or tablet) you can open in your Chrome or Safari browser. Alternatively, you can download the Zoom app:
 - From the [Apple App Store](#).
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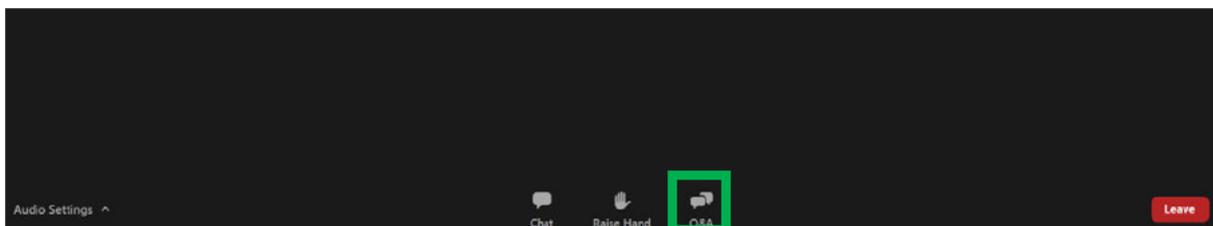
5. When you enter the event, you will be prompted to enter your details.
6. After entering these details, you will enter the event room. If you have entered this room ahead of the event start time of 10am, the box like the one below will be visible on your screen:



7. The webinar will begin at **10am** with a presentation provided by the project team. This will then be followed by a Q&A session.

Participating in the event

- During the event, your audio and video will not be visible to anybody in the webinar session.
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 - The team will then be able to temporarily unmute your telephone, so that you can ask a question.



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After the event

If you have any follow-up questions, please feel free to send these to our project information lines afterwards.

Troubleshooting common issues

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A Guide for Attending our Webinar

Overview

You have been invited to attend the community consultation webinar on Nautilus Interconnector project on **Tuesday 12 October 2021**. This document provides you with a step-by-step guide to accessing the webinar.

The webinar will be conducted in a moderated Q&A format. Your audio and video will not be available to be heard or seen by anyone attending the webinar. Questions are submitted via the Q&A button on the bottom of your screen.

All questions go through to a member of our team who will manage and collate them all to then be answered by a member of the team after the presentation.

Please note the presentation will begin at **6pm**, so you are advised to join slightly before, if possible. You are free to leave and re-join as many times as possible whilst the webinar is ongoing.

Step-by-step guide to joining the webinar

1. To join the webinar please click on the corresponding link, or enter the URL directly into your browser:

- **Tuesday 12/10/2021, 6pm**

<https://us02web.zoom.us/j/86217503132>

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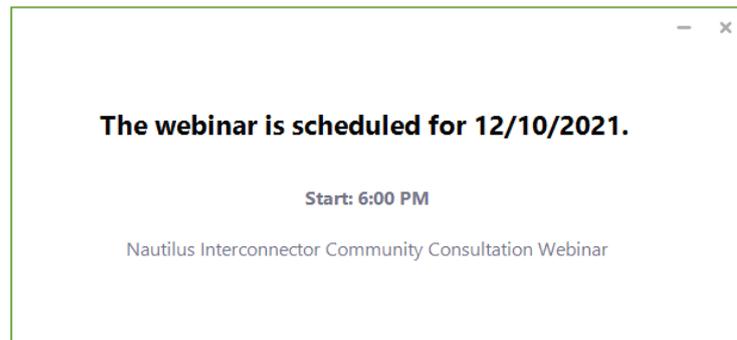
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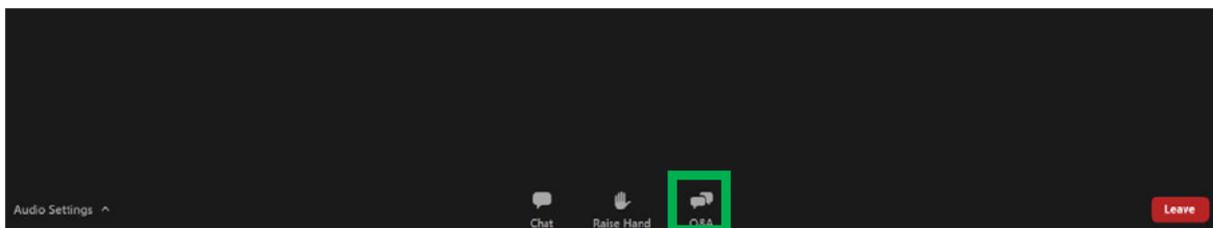
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RESPONSE TO OFGEM CONSULTATION ON CHANGES INTENDED TO BRING ABOUT GREATER COORDINATION IN THE DEVELOPMENT OF OFFSHORE ENERGY NETWORKS.

7 SEPTEMBER 2021

INTRODUCTION

1. SASES and SEAS are community groups which have been formed to challenge a number of offshore energy projects, none of which have development consent, which are planned to (or which are likely to) make landfall on the Suffolk Coasts and Heaths AONB, whose cables will then traverse the AONB along a series of routes. The first three of these projects all of which are NSIPs are:
 - A new National Grid Offshore Transmission Connection Hub being promoted by Scottish Power on behalf of NGET
 - East Anglia ONE North being promoted by Scottish Power
 - East Anglia TWO being promoted by Scottish Power
2. It should be noted that originally the EA1N and EA2 offshore transmission networks and connection points were coordinated with Scottish Power's EA1 and EA3 projects with the same landfall, cable route and connection point at Bramford, an existing National Grid Connection Hub.
3. For reasons which have never been entirely clear National Grid and Scottish Power abandoned a coordinated approach and have promoted these projects involving another landfall in the Suffolk Coasts and Heaths AONB, a new cable route across the AONB and Suffolk countryside to a greenfield location next to the historic rural village of Friston. There could not be a better example of:
 - lack of coordination
 - lack of efficiency
 - potentially wasted costs
 - unnecessary environmental damage
 - unnecessary disruption to coastal communities
 - unnecessary damage to the local economy and employment given tourism is dependent on the area's environmental quality and is a key part of the local economy,particularly when a coordinated approach was previously proposed based on the connection offers originally made by National Grid.
4. We welcome the Offshore Transmission Network Review and this associated consultation by Ofgem. For obvious reasons our particular focus is Early Opportunities given the current status of these projects notwithstanding that, so far, neither National Grid or Scottish Power have opted in to the Pathfinder programme. We believe that these projects could easily become Pathfinder projects given these projects were previously coordinated with

EA1 and EA3 promoted by the same developer. A submission in relation to that will be made to the OTNR.

5. Further the interaction of Early Opportunities with later workstreams needs to be considered given the impact and benefit which they may have for future projects. Accordingly it is in the interests of all stakeholders that as many projects which could fall within the Early Opportunities workstream become Pathfinder projects. In that context we welcome OFGEM's and BEIS's recent letter containing this statement,

*"We would strongly encourage developers to proactively consider opportunities for coordination **with others in the same region** where they have not already done so",*

and National Grid should also be strongly encouraged.

COMMENTS ON OFGEM'S APPROACH TO POLICY ASSESSMENT

Narrowness of Ofgem's Remit

6. Ofgem (in paragraph 1.23) refers to its principal objective which "is to protect the interests of existing and future consumers". However it is submitted that this hampers effective policy assessment particularly when the issues which have prompted the offshore transmission network review go beyond consumers' interest.
7. Policy assessment should be conducted in the context of existing statutory obligations:
 - Section 9 of the Electricity Act 1989 which imposes general duties on persons engaged in electricity transmission to develop and maintain an efficient, coordinated and economical system of transmission.
 - Schedule 9 which requires such persons to have regard to the desirability of preserving natural beauty and heritage.
8. SASES has received correspondence from Ofgem which demonstrates a lack of focus on coordination and efficiency, given Ofgem's lack of supervision of National Grid's CION process, and no supervision in relation to environmental matters – see letters from Ofgem dated 28 May 2019 and 30 January 2020 attached at Appendix A.
9. Focusing on the interests of consumers risks only addressing "economical" issues. It should be remembered that "economical" and "efficient" have different meanings, and as a matter of interpretation are required to have different meanings. Arguably this limited focus has in part led to an uncoordinated and inefficient system which has not had regard to environmental matters.
10. Further the narrowness of Ofgem's remit runs contrary to the Policy Assessment Criteria referred to in paragraph 1.22 where the theme of "Environmental and Societal Impact" is

referred to. How can this theme/impact¹ be given at least equal weight as the other themes/criteria given Ofgem's remit?

11. Accordingly if Ofgem's remit is not widened the resulting policy options will be flawed.

The Role of National Grid ET/ESO

12. The consultation document indicates that National Grid is regarded as a facilitator/enabler both of the OTNR and the Ofgem consultation. However effective coordination of offshore transmission requires coordination onshore and the coordination of onshore and offshore transmission with each other as well as in isolation. By not addressing these issues the policy options resulting from the consultation will be flawed.
13. Further National Grid is a developer in its own right. Its SCD1 project connecting East Suffolk to East Kent will cut across a number of current and future cables connecting OFWs to the shore. It could be regarded as form of domestic interconnector and might be capable of being a TO owned bootstrap as illustrated in Figure 8.
14. The respective roles of NGET and NGESO are not entirely clear and there is the possibility of an actual or perceived conflict of interest. National Grid's divisions' roles need to be clarified in the context of this consultation and the OTNR and the possibility of a conflict of interest analysed and addressed.
15. Ultimately a holistic transmission strategy offshore and onshore can only be designed by a completely objective party whose primary interest is the national interest not the interests of shareholders.

Anticipatory Investment – the need to assess risks relative to benefits

16. Ofgem is rightly concerned about the risk inherent in anticipatory investment and stranded assets however the degree of concern is excessive for the following reasons.
17. There is a substantial "prize" on offer, namely the delivery of £6 billion in consumer savings – see paragraph 1.13. Not taking the steps necessary to secure the savings is a risk in itself. Put simply not taking a risk on anticipatory investment will cost the consumer £6 billion.
18. There needs to be some assessment of the relative quantum of risks as the level of anticipatory investment may be low compared to the potential of £6 billion of consumer savings.

¹ It should be clarified that these are two separate albeit related impacts, not one. There needs to be greater clarity as to what environmental and societal impacts mean. It should for example include damage to wellbeing and the risk of damage to key sectors of existing local economies, recognising that "consumers" may well be affected by these impacts. Consumers are people whose interests go beyond simple cost.

19. In terms of assessing the real risk of stranded assets there should be some consideration of geography. Looking at the coastline of East Anglia and the need for power to be transmitted to London and the South East, given the small areas involved onshore how likely is it that assets will be stranded? This geographical proximity should also give comfort to developers who currently lack sufficient entrepreneurial vision to engage in anticipatory investment.

Behavioural Issues

20. Policy and regulatory changes need to be effective in changing behaviour i.e. moving developers and National Grid away from inefficient, uncoordinated and environmentally damaging transmission systems. Changes were made in 2015 – see paragraph 2.11 – and yet developers, including National Grid did not take advantage of these. Therefore are there commercial/behavioural factors other than the regulatory regime which are acting against greater efficiency and coordination? If such factors are not investigated and understood then any further regulatory changes could be equally as ineffective as those introduced in 2015.

EARLY OPPORTUNITIES QUESTIONS

1. *Are there any concepts we have not identified developers (as defined in this chapter) may wish to progress?*

The observation we would make is that these concepts may need offshore generation to be consented separately from the offshore network transmission system sometimes referred to as a “split decision”. This would allow the windfarm itself to be developed and provide time for coordination of the offshore transmission system and onshore connection.

Further these concepts should be tested against approaches used by other national transmission operators. For example do these concepts accommodate the Modular Offshore Grid (MOG) approach pioneered by ELIA, the Belgian national transmission operator? The UK should seek to benefit from the experience and knowledge of other countries.

2. *Should anticipatory investment risk be shared with consumers? If it should, what level of risk is it appropriate for consumers to bear?*

In answer to the first question yes given the substantial benefits/savings to the consumer which may result. Further as Ofgem acknowledge (see paragraph 2.23) “a significant proportion of all network investment is anticipatory” and therefore by definition anticipatory risk is already shared with the consumer.

In terms of the second question both (i) magnitude of the risk in financial terms and (ii) the likelihood of the risk transpiring needs to be considered. In terms of magnitude of risk this should be considered in the context of how the benefits/savings arising from the anticipatory investment are likely to be shared.

In terms of likelihood the higher the likelihood of the anticipatory investment delivering benefits the lower the level of risk the consumer should bear.

Given climate change and the UK's need for renewable energy as reflected in the Government's targets, it seems unlikely that an offshore wind project with a seabed lease will not progress. In fact it should be assumed that it will progress unless there is a clear reason why it might not. Further practical factors should be taken into account. For example as referred to above if there are windfarms and transmission systems in relatively close geographical proximity, in reality there is a small risk that anticipatory investment will be wasted.

In answering this question substantial weight needs to be taken of the substantial reduction in environmental damage.

3. For concepts that [are] intended to provide a wider system benefit, e.g. by mitigating an onshore constraint, how should the need for investment be demonstrated by the developer?

No comment

4. What options are available to developers in demonstrating a reasonable expectation they intend to connect to the system?

It is really a matter of how it can be demonstrated that there is a reasonable expectation that a potential generation project will connect to the system. As indicated above there is a factual matrix which can inform the degree of expectation including for example:

- agreements with the Crown Estate, whether this be of an agreement to lease or the arrangements whereby investigatory works on the suitability of the seabed for a OFW can be determined
- the demand for renewable generation capacity and where that demand is located
- the geographical proximity of other OFW projects offshore
- the number and geographical proximity of connection points onshore
- the timetable for development

Such a factual matrix needs to be further developed to determine degrees of expectation.

5. To what extent do you agree with our proposals to remove barriers to the early opportunity concepts? Please explain your answer.

Ofgem's proposals are a big step in the right direction however the following additional issues needs to be considered:

- effective enforcement of Section 9 and Schedule 9 of the Electricity Act against transmission system operators and in particular National Grid
- treating National Grid as a developer
- there needs to be an understanding of why previous changes to the regulatory environment were not effective to ensure that further changes have the desired result - see paragraph concerning behavioural issues above.



6. *Do you believe a Significant Code Review is required to give effective potential decision to “share” AI risk between consumers and developers?*

No comment

7. *Do you agree with Ofgem’s proposed approach to deliver the objectives of Early Opportunities work stream?*

To an extent but Ofgem’s remit is not enabling a complete approach. National Grid’s pivotal role in coordination and efficiency and in reducing environmental damage is not being directly addressed by Ofgem – see “Narrowness of Ofgem’s Remit”.

Ofgem needs to take proactive role beyond “strong encouragement” to ensure that every potential opportunity is explored recognising the vacuum in addressing coordination, efficiency and environmental impacts which National Grid has allowed to develop despite its statutory obligations.

APPENDIX A

Letters from Ofgem dated 28 May 2019 and 30 January 2020

(see attached)

Monday 27th September 2021

www.nationalgrideso.com

Electricity System Operator (ESO) Open Letter on the Offshore Transmission Network Review (OTNR)

Dear colleagues,

One of the key areas of regulatory development at this time is the effort to bring about greater coordination in the development of the offshore transmission system through the OTNR, which was launched in July 2020 by the Minister of State for Business, Energy and Clean Growth to support the offshore wind target of 40GW by 2030¹.

Within the OTNR we are working collaboratively with key stakeholders, including the Transmission Owners (TOs). We have published this open letter in our role as the chair of the newly established Central Design Group (CDG) within the OTNR Pathway to 2030 workstream. It has been drafted in collaboration with the TOs and the content is supported by Scottish and Southern Electricity Networks Transmission (SSEN-T), Scottish Power Energy Networks (SPEN) and National Grid Electricity Transmission (NGET) as key members of the CDG

This open letter provides an update to offshore project developers on how the OTNR could impact on their current offshore connection contracts or any future offshore applications / modifications. In this context, and given the aims of the OTNR, 'offshore' refers to applications and connection contracts for access to and use of the transmission system for either generation or demand projects which are not located onshore. As a result, offshore encompasses projects with offshore infrastructure, including offshore wind farms, offshore demand, interconnectors and Multi-Purpose Interconnectors (MPIs) even though they are not classed as offshore transmission.

structured in workstreams² and the impact of each of these on connections is different. [redacted] position on each workstream as follows.

[redacted] workstream

Under the current arrangements, connection offers have been made on the basis that the design of the transmission works (onshore and offshore), and specifically the interface between these transmission works, have been established through the 'Connection and Infrastructure Options Note process' i.e. the CION process³. This CION process is usually fully undertaken after the connection offer has been entered into by the developer and the ESO.

Any offshore projects which have previously been through the full CION process but have not achieved both planning consent and a Contract for Difference (or equivalent) will generally be considered to be within scope of the Early Opportunities workstream. Those projects can opt-in with a pathfinder proposal to consider coordination and further information on opting-in can be found [here](#). As these projects are at an advanced stage of development where much of the detailed network design and planning consent work has already been completed, opting-in to a coordinated design is currently voluntary.

The intention of this workstream is to provide an avenue for offshore developers to consider opportunities for these projects to work together to determine whether there is a more coordinated option available than that previously identified through the traditional CION approach, especially in regions where several projects are

¹ <https://www.gov.uk/government/groups/offshore-transmission-network-review>

² Early Opportunities, Pathway to 2030, Enduring Regime and MPIs.

³ A 'connection offer' is the contractual documentation provided to a developer following a licenced 'connection process', whereas the 'CION process' is an associated process which only applies to some connection offers. More information can be found [here](#) and [here](#).

expected to connect. If identified and agreed to be deliverable under Early Opportunities, connection contracts will then need to be updated to provide for this coordination.

We will inform relevant project developers if their current/planned project is considered to be in-scope for the Early Opportunities workstream.

We expect that any offshore projects considered to be connecting prior to the Early Opportunities workstream scope will likely continue under the status quo connection process and contract arrangements. This category includes any offshore project which has concluded their post-signature CION process (if required) and has relevant planning consents and a Contract for Difference, or equivalent.

Pathway to 2030 Workstream

As set out above, a CDG has been set up under the OTNR for the Pathway to 2030 workstream which will allow the ESO to produce a Holistic Network Design (HND) in consultation with the TOs in respect of the connection of in-scope offshore projects and/or agreed future capacity requirements. A draft of the Terms of Reference for the CDG can be found within the recent Ofgem consultation related to Early Opportunities, Pathway to 2030 and MPis [here](#).

Projects in-scope for the HND and Pathway to 2030 workstream are primarily The Crown Estate Leasing Round 4⁴ and ScotWind⁵ projects. These projects will be considered in the HND which is aiming to be delivered as per the CDG Terms of Reference. We anticipate that the workstream scope will also include offshore projects within the Celtic Sea⁶ and a handful of other offshore projects which are spatially and/or temporally relevant to other in-scope projects for the HND and Pathway to 2030 workstream. We will inform relevant project developers if their current/planned project is considered to be in-scope for the HND and Pathway to 2030 workstream, with additional connection contract clauses added into relevant contracts. This will only be to the extent that they are necessary to account for the potential future changes due to the HND and Pathway to 2030 workstream.

The approach to ensure connection offers include the overall efficient, coordinated and economical solution remains and is now reinforced by the objectives of the OTNR, including the HND as per the Terms of Reference as above. The traditional CION process reflects a more limited approach to coordination than is now envisaged under the HND and Pathway to 2030 workstream. This traditional approach will therefore be adapted for in-scope projects and the connection design and post CION offer will instead be based on the outputs of the HND for in updated connection contracts in future.

[REDACTED] we will work with TOs and in-scope developers to update connection contracts as a result of any changes to the interface site, connection date, etc.) and also as a result of any changes to the [REDACTED] as has recently been consulted upon by Ofgem within the above referenced consultation.

We will continue to engage with in-scope project developers over the coming months. This includes holding the first of a programme of regular webinars for in-scope project developers in the near future and more information, including on the date and time of this first webinar (which will be mid-October 2021), will be provided in the near future. Further information on process and timescales will be provided and you can register your interest [here](#).

A high-level overview of the key process steps to develop the HND, is included within Appendix 1.

Enduring Regime Workstream

For offshore projects which are not within scope of a prior workstream there will still be project impacts as the Enduring Regime continues to be developed.

As such, in the short-term any new offshore applications considered to be intending to connect within the Enduring Regime timescales (i.e. subsequent to Early Opportunities and Pathway to 2030) will be progressed

⁴ <https://www.thecrownestate.co.uk/en-gb/what-we-do/on-the-seabed/offshore-wind-leasing-round-4/>

⁵ <https://www.crownstatescotland.com/what-we-do/marine/asset/offshore-wind/section/scotwind-leasing>

⁶ <https://www.thecrownestate.co.uk/en-gb/media-and-insights/news/the-crown-estate-to-create-new-floating-wind-leasing-opportunity-in-the-celtic-sea/>

on a 'pre-CION' basis. Whilst this will tentatively identify the transmission works and resulting connection date (etc), further work will be required to validate or amend these at a later date.

The connection offer will therefore be subject to the outcome of the development of the Enduring Regime, including the process for identifying the overall efficient, coordinated and economical solution and the available offshore delivery models.

We will keep the post-acceptance position/process for projects in-scope for the Enduring Regime under review, as we expect them to be delivered through the approach developed in this workstream rather than through the traditional or adapted CION approach as above. This will be recognised and provided for in any connection contracts offered in future. An initial consultation related to the Enduring Regime is expected to be published by the Department for Business, Energy and Industrial Strategy (BEIS) in the near future.

We will inform relevant project developers if their current/planned project is considered to be in-scope for the Enduring Regime workstream and we expect that additional connection contract clauses will be incorporated into relevant connection offers as a result of the Enduring Regime workstream.

Next Steps

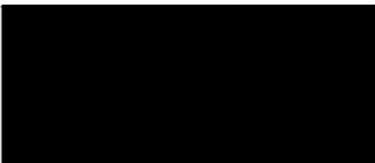
We recognise that the above will create uncertainty for current and future offshore developers. As you may appreciate, matters are evolving and we hope that this open letter starts to provide clarity, especially for projects in-scope for Pathway to 2030 in relation to the key process steps included within Appendix 1.

As well as the expected Pathway to 2030 webinars mentioned above, we will be publishing an Autumn Offshore Coordination progress update in mid-October 2021 and subsequently holding a progress update webinar shortly thereafter and further information on both will be provided in the near future.

We will continue to keep you updated and engage you as the OTNR is progressed across all workstreams.

In the meantime, if you have any questions about the potential impacts on your current or planned future offshore projects please get in contact with your ESO Connections Contract Manager or the Offshore Coordination Team at box.OffshoreCoord@nationalgridESO.com.

Yours sincerely



Graham Stein

Offshore Coordination Senior Manager and CDG Chair

APPENDIX 1

The HND will be developed in close engagement with key stakeholders and offshore project developers are one of those key stakeholders. We expect that offshore project developers will have relevant information and insights in relation to the development of the HND in support of the ESO and TOs. Therefore, we expect that the CDG will regularly engage and consult with impacted offshore project developers at key points throughout the HND development process via a variety of channels e.g. bilateral discussions, webinars, periodic update publications, etc. This engagement will continue beyond the publication of the HND. So far, we have produced a high-level overview of the key process steps in respect of the development of the HND.

Step 1: Onshore Network Update

Update of the onshore network model to incorporate additional network reinforcement schemes to support 40GW of offshore wind by 2030. Development of a Cost-Benefit Analysis (CBA) methodology against which the options will be considered in relation to the HND as per the CDG Terms of Reference.

Step 2: Onshore and Offshore Network Planning and Coordination

- a. 2030 counterfactual offshore design
 - Analyse the counterfactual design i.e. radial connections for in-scope projects.
- b. 2030 coordinated offshore design
 - Develop the strategic medium-term coordinated offshore network design for 2030. This design will only consider in-scope offshore wind anticipated to connect up to 2030.
- c. 2030 coordinated offshore design with a 2050 outlook
 - Develop a strategic outlook coordinated offshore network design for 2030. This design will consider the 2030 network in the context of the development of offshore wind across three future energy scenarios to 2050.

Step 3: CBA and Least Worst Regret Analysis

The CBA will be undertaken to identify the preferred HND for projects in-scope. This will involve appropriate consideration of each of the four Network Design Objectives within the CDG Terms of Reference.

Step 4: Final Report with Recommendations

Information will be included within a Final Report in respect of the HND.

Step 5: Consultation

There will likely be a need to refine some of the HND once the outcome of the ScotWind leasing round is known in January 2022.

Step 6: Connection Contract Update Programme⁷

Connection contracts will be updated as and where required as a result of the HND e.g. in respect of any onshore and offshore works, the interface point, the connection date, etc.

Step 7: Detailed Network Design (Post-HND)

Once the HND stage formally concludes, subject to the above referenced Ofgem consultation, onshore TOs will (for onshore work not already within this stage) take relevant onshore transmission system works into the detailed network design stage. The relevant offshore transmission works will be taken into the detailed network design stage by the appropriate party in accordance with such Ofgem consultation.

⁷ Subject to Step 5 being required and concluded and any potential interactions with the outcome of the offshore delivery model consultation. We will continue to develop Step 6 and aim to provide potentially impacted developers with a more robust and granular plan in relation to the connection contract update programme in Q4 2021.

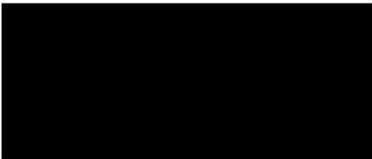
Engagement and close working with projects in-scope will occur over the coming months and also ahead of the Final Report becoming available. We will also endeavour to share any interim views and outputs with key stakeholders. Current and planned engagement with projects in-scope includes:

- Engagement on offshore unit costs
- Engagement on offshore constraints
- Engagement on any proactive coordination proposals for the HND from projects in-scope

For the avoidance of doubt, we are happy to engage in respect of projects in-scope more broadly than in relation to the above points and we are also happy to engage with other interested stakeholders beyond those directly impacted by the HND.

Stakeholders will be informed and engaged at appropriate stages throughout the above process.

Further information in relation to such engagement will be provided to in-scope projects in the near future.



From: Nick Ireland [REDACTED]
Sent: 04 October 2021 11:12
To: HANDS, Greg [REDACTED]
Subject: Scottish Power EA1N & EA2/associated projects

10 Mill Road, Friston, Suffolk. IP17 1NW.

Dear Rt. Hon. Greg Hands,

I am a resident of the village of Friston in Suffolk. I [REDACTED] moved here to get away from noisy town life, and Friston is idyllic, it's peaceful, we have one public house and no shop. At night it's pitch black and silent, perfect in fact. We have visited the region over the past 30 years and have family not too far away so knew of plans for a substation in the area. Believing that renewable energy is the way forward, we were not too bothered by what we understood to be a small substation. We had no idea of the scale this was to be or the amount of historic footpaths and wildlife habitats it would destroy. We have been walking around all the local footpaths near our home and have discovered more about the proposed projects and are totally against such a disruptive and unnecessary development on an such a beautiful area. Scottish Power started 'test digging' this summer at the proposed site, and they have destroyed a vast area. There now appears to be other additions to proposals for the area which will have a devastating cumulative impact on this area of outstanding natural beauty.

Is there a reason this small village of Friston has been chosen for all these energy projects with Sizewell C, Nautilus, UK Interconnectors,

Five Estuaries and North Falls? As a village, once built we will suffer noise 24hrs a day, and light pollution, not to mention the added vehicular movements on roads that are totally unsuitable. The construction will also impact on tourism in the local area which is the main industry alongside of farming. I'm not sure how the proposals claim to be green energy when it is destroying an environment to build it? Why is it necessary for these proposed structures to be built in an AONB when there are so many brownfield sites? Why isn't the offshore option being considered more seriously? I'm so saddened to see the scale of the Scottish Power plans and now all these other projects jumping onto the same location, it seems more than coincidental. Although the planning has not been passed yet, lots of work has already been carried out and the public footpaths have been made impassable around the substation site. Are we to assume that the substation is already a 'done deal'? At a meeting this weekend with National Grid who are wanting to tie their Nautilus project in, a representative suggested that it is, in fact he also let slip that Scottish Power have already started construction of some cable runs and would be in serious trouble should permission not be granted. How can this happen when permission has yet to be given? Are we the public and residents having our opinions totally overlooked? Is this project going ahead no matter what? It seems that way.

Please consider refusing this devastating planning proposal for the future generations of families in this beautiful area.

Yours sincerely

Nick Ireland

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From: Rosamond Castle [REDACTED]
Sent: 05 October 2021 12:56
To: KWARTENG, Kwasi [REDACTED]
Subject: SPR East Anglia One North/East Anglia Two

Dear Mr Kwarteng,

I know that a decision will soon be made on the above planning applications and I would like to express my disquiet at the thought of them being granted. I know that renewable energy is essential - I am a supporter of Greenpeace and Friends of the Earth - and I do not have a problem with the offshore part of the proposal, but I feel the choice of Friston for the substations is entirely misguided. It is not a green solution to use farmland rather than a brown-field site, for the cable corridor from landing point to substation to require 9km of countryside to be dug up, for local communities to live with noise, road congestion, air and light pollution for many years, for the local economy, which is heavily reliant on tourism, to be decimated.

And this is only the start. We now have National Grid (who refused to take any part in the open hearings for EA1N and EA2) holding meetings about the Nautilus Interconnector and planning to add to the industrialisation of our area, assuming that SPR get approval. This part of Suffolk cannot bear the brunt of all the energy projects currently being proposed. These include NGV's Eurolink onshore converter station; Sizewell C and D; UK Interconnectors SCD1 & SCD2; Five Estuaries, and North Falls.

I therefore urge you not to approve SPR's plans.

Yours faithfully

Rosamond Castle

[REDACTED]

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From: [REDACTED]

Sent: 05 October 2021 13:52

To: handsg@parliament.uk

Subject:

Dear Mr. Hands,

I have been following Scottish Powers plans being debated on The Planning Inspectorates Zoom meetings over the past eighteen months and know that you have to make a decision soon.

I am in support of Renewable energy and for the offshore wind farms but not for the plans put forward by Scottish Power for their Onshore Substations.

The site that National Grid suggested to Scottish Power was right in the middle of the Suffolk countryside only a couple of hundred meters away from the quiet village of Friston.

National Grid who also wish to build their own substation in the same area declined the offer to be part of the Planning Inspectorates investigation saying this was purely a matter for Scottish

Power even though Friston was their idea once they found that running onshore cables from Bawdsey to their existing substation site at Bramford would cost them and their shareholders

more money.

So I hope you will support a split decision. Yes to their offshore plans and No to their onshore plans.

I am very worried also about the cumulative impact this would have on the area as National Grid and National Grid Ventures have plans for more wind farms to build interconnectors

and convertors around Friston. These include Nautilus and Eurolink, Five estaries (RWE) and North Falls (RWE) who will all need cables running from the coastline digging

up even more of the Suffolk countryside.

The roads around this area are all small and windy and some need passing places for cars travelling to get past each other. Not to mention the amount of tractors around as this is a busy

working farming area. Endless HGVs needed in construction of the 8 Km cable route from Thorpeness and again at the site in Friston would cause total havoc to everyone living here

and also to the tourist area especially the seaside town of Aldeburgh and the world famous music centre at Snape.

There are many brown field sites around in Suffolk which could be used without having to destroy acres of pristine countryside although I understand that this would cost Scottish Power

extra money.

What they should be doing is working with Ofgem and building an Offshore Ring Main (ORM) which would do away with all these onshore cable routes.

So I implore you not to consent to this ill thought out plan by Scottish Power.

Yours sincerely,

Ian Cook

[REDACTED]

From: Liz Thomas [REDACTED] >

Sent: 06 October 2021 12:17

To: East Anglia ONE North <EastAngliaOneNorth@planninginspectorate.gov.uk>; East Anglia Two <EastAngliaTwo@planninginspectorate.gov.uk>

Subject: Request for inclusion

Dear Sirs

Attached is a copy of the letter I have sent to the RT. Hon. Kwasi Kwarteng and wish to be submitted along with the Inspectors recommendations for SPR Planing Application for EA One North and EA Two windfarms.

My letter deals with the impact of the onshore integration of the power from the windfarms and reflects the issues submitted in representations during the hearing process.

Kind Regards
Elizabeth Thomas

PINs Reg:
20023648
20023649



Rt. Hon Kwasi Kwarteng

**Re Scottish Power Renewables
East Anglia 1 and East Anglia 2 Windfarms**

Dear Minister

I am writing regarding Scottish Power Renewables plan to site a Substation adjacent to a small medieval village in the heart of rural East Suffolk. The Planning Inspectorate's recommendations regarding Scottish Powers' proposal will be arriving on the desk of the Secretary of State very soon. From the inception of this plan up to the present date the emergence of the negative impact of the onshore integration of electricity generated by wind power, has taken on a worrying dimension nationwide, not least in East Suffolk. In addition to its productive tourist and agricultural economies this area is renowned for its rurality and valuable habitats. For the protection of these valuable assets including the economy and the livelihoods of many families and artisans in this area, it is imperative the Secretary of State does not agree that Scottish Power Renewables embark on their plans to build a large Substation adjacent to Friston in East Suffolk.

During the inspection process we presented to the Planning Inspector many reasoned arguments as to why Scottish Powers' plans for the Substation are flawed with one of the most significant deficiencies in their plans being the proposal of site selection adjacent to a tiny rural community in Friston. Of great significance is the future prospect of the cumulative effects of at least six further energy projects and industrial developments which will arrive in this area as a result of Scottish Power Renewables development being consented.

I urge the Secretary of State to take an holistic view on the development of the onshore integration of wind power recognising this is a pivotal point in the development of Green Energy. Now is the opportunity to balance the need to reduce CO2 emissions against the damage incurred long term to productive and valuable rural areas. Now is an opportunity for this country to become a leader, balancing the need for greener energy and the indiscriminate loss of the core structure of our onshore landscapes. Consider a split decision regarding Scottish Power Renewables planning application and explore a pathway which will provide the energy to meet the needs of our population but also preserve our countryside for future generations.

Elizabeth C Thomas

Friston Resident



6 October 2021

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Sirs

East Anglia TWO Limited (the "Applicant")
The Proposed East Anglia TWO Offshore Windfarm Order
Application Ref. EN010078

Letter of No Impediment (Badger)

We refer to the Applicant's *Comments on Natural England's Deadline 12 Submissions* (document reference REP13-015) submitted to the East Anglia TWO Examination, which confirmed the Applicant was seeking a Letter of No Impediment for Badgers from Natural England.

We now enclose the Letter of No Impediment for Badgers, as issued by Natural England. We would be grateful if this could be forwarded to the Secretary of State.

The Applicant continues to liaise with Natural England regarding a Letter of No Impediment for Great Crested Newts, and submitted further information to Natural England on 9 September 2021 to address queries received from them. The Applicant will forward the Letter of No Impediment for Great Crested Newts to the Secretary of State once issued.

Yours faithfully



Brian McGrellis, Onshore Consents Manager
East Anglia TWO Limited

Enclosures: *Letter of No Impediment (Badger), Natural England, Reference: 2021-51761-NSIP1 A001030 / 10572 / 361557*

ScottishPower Renewables, 320 St Vincent Street, Glasgow G2 5AD
Telephone 0141 614 0000

ScottishPower Renewables (UK) Limited Registered in Northern Ireland No.: N 028425
Registered Office: The Soloist, 1 Lanyon Place, Belfast, Northern Ireland, BT1 3LP.

Date: 04 August 2021
Our ref: 2021-51761-NSIP1
A001030 / 10572 / 361557
(NATIONALLY SIGNIFICANT INFRASTRUCTURE)



Brian McGrellis,
Onshore Consents Manager,
Scottish Power Renewables (SPR)
Sent by e-mail only

Wildlife licensing
Natural England
Horizon House
Deanery Road
Bristol
BS1 5AH
Email:
wildlife@naturalengland.org.uk
Tel: 020 8026 1089

Dear Brian McGrellis.

Cc Gordon Campbell (Senior Environmental Consultant, Royal HaskoningDHV) and
Darren Jameson (Project Manager, SPR)

<p>DRAFT MITIGATION LICENCE APPLICATION STATUS: SUBSEQUENT DRAFT APPLICATION LEGISLATION: THE PROTECTION OF BADGERS ACT 1992 (as amended) NSIP: EAST Anglia TWO (EA2) Offshore Windfarm, Suffolk SPECIES: Badger</p>
--

Thank you for your subsequent draft badger mitigation licence application in association with the above NSIP site, received in this office on 28 June 2021. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'letter of no impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Assessment

Following our assessment of the resubmitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.

However, please note the following issues have been identified within the current draft of the method statement that will need to be addressed before the licence application is formally submitted. Our wildlife adviser, Daniel Weightman, discussed this matter with the named ecologist Gordon Campbell via e-mail correspondence on 28 July 2021, after which it was confirmed on 04 August 2021 that the necessary amendments would be made. Please do ensure that the Method Statement is revised to include these changes prior to formal submission. For clarity these include:

- Evidence of the named ecologist's experience in relation to artificial sett construction.
- Updated badger surveys of the site, including previously un-surveyed land within and abutting the DCO boundary, which will be impacted by the development.

- In the event main sett 33b will be lost, additional details regarding the final location of an artificial sett, including supporting information from any bait survey conducted, will be required.
- Details of the location of the proposed two-way badger gates along the perimeter fence, in relation to badger runs / pathways identified during surveys.
- Consideration must be given to the additional recommended mitigation, set out in points 5.2. to 5.4. in the accompanying advice letter, in relation to the location of soil storage areas, clearance of vegetation and the presence of livestock susceptible to badger borne disease within 2km of the project.

Next Steps

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

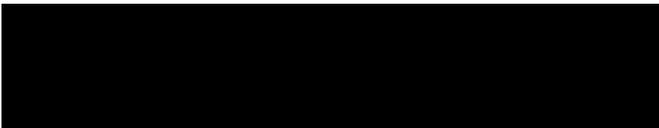
Full details of Natural England's licensing process with regards to NSIP's can be found at the following link:

http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/Images/wml-g36_tcm6-28566.pdf

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely


Daniel Weightman
Wildlife Lead Adviser
Natural England Wildlife Licensing Service


Cc commercialservices@naturalengland.org.uk

Annex - Guidance for providing further information or formally submitting the licence application.

Important note: when submitting your formal application please mark all correspondence 'FOR THE ATTENTION OF (Daniel Weightman, Helen Mann, Louise Burton and Lydia Tabrizi).

Submitting Documents.

Documents must be sent to the Natural England Wildlife Licensing Service (postal and email address at the top of this letter).

Changes to Documents –Reasoned Statement/Method Statement.

Changes must be identified using one or more of the following methods:

- underline new text/strikeout deleted text;
- use different font colour;
- block-coloured text, or all the above.

Method Statement

When submitting a revised Method Statement please send us one copy on CD, or by e-mail if less than 5MB in size, or alternatively three paper copies. The method statement should be submitted in its entirety including all figures, appendices, supporting documents. Sections of this document form part of the licence; please do not send the amended sections in isolation.

Customer Feedback – Wildlife Licensing

To help us improve our service please complete the following questionnaire and return to:

Wildlife Licensing Natural England, Horizon House, Deanery Road, Bristol, BS1 5AH.

or email to wildlife@naturalengland.org.uk

<http://www.gov.uk/guidance/wildlife-licences>



Natural England Reference Number (optional):	Please tick to indicate your role:	Consultant	<input type="checkbox"/>
		Developer (Applicant/Licensee)	<input type="checkbox"/>

1. How easy was it to get in contact with the Wildlife Management & Licensing team of Natural England?

Difficult (1) *OK (2)* *Easy (3)* *Very Easy (4)*

If 1 please specify who you initially contacted in relation to your issue/enquiry?

2. Please tell us how aware you were (BEFORE you contacted us) of wildlife legislation and what it does/does not permit in relation to your enquiry?

Unaware (1) *Very Limited Awareness (2)* *Partially Aware (3)* *Fully Aware (4)*

3. How would you rate the service provided by Natural England?

	<i>Poor</i> 1	<i>Fair</i> 2	<i>Good</i> 3	<i>Excellent</i> 4	<i>Not applicable</i>
Ease of completion of application	<input type="checkbox"/>				
Advice provided by telephone (if applicable)	<input type="checkbox"/>				
Our web site (if applicable)	<input type="checkbox"/>				
Clarity and usefulness of published guidance	<input type="checkbox"/>				
Helpfulness and politeness of staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advice and clarity of explanations provided during Method Statement assessment	<input type="checkbox"/>				
Advice and clarity of explanations provided during Reasoned Statement assessment	<input type="checkbox"/>				
Speed of process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Overall service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

If 1 or 2 to any of the above please specify why:

4. Was your issue/enquiry resolved by the activity authorised under licence or advice provided by us?

Fully *Partially* *Unresolved*

If not fully resolved please state what you think could have been done instead (note legislation affects which actions can be licensed):

5. Was there a public reaction to any action taken under the licence or as a result of our advice?

Positive support *No reaction* *Negative reaction*

6. Would you use a fully online licensing service if it could be made available in the future?

Definitely *Possibly* *Unlikely* *No*

7. Do you have any further comments to make or suggestions for improving our service, if yes please specify (continue comments on an additional sheet if necessary). If you are happy to be contacted at a later date to explore possible improvement options, please tick this box and ensure your Natural England reference number is at the top of this page.

From: Bernard & Jane Bence [REDACTED]
Sent: 06 October 2021 16:40
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED]
Subject: SPR planning application for EA1N and EA2

For the attention of the Rt. Hon. Kwasi Kwarteng, M.P.

5 October, 2021

Dear Mr Kwarteng,

As local residents, we wish to register our deep concern and strong objection to the planning applications of Scottish Power Renewables for East Anglia North (EA1N) and East Anglia Two (EA2). The planned onshore substation adjoining the village of Friston and associated cable corridors linking it to the offshore wind turbines will involve the appalling destruction of an unspoilt and valuable protected area of rural England, rich in wildlife.

The effect on the local nature-based rural tourist economy will be devastating and a beautiful unspoilt area of countryside will be marred by enormous industrial buildings. There will also be years of pollution and congestion (roads are already used by an increasing number of large farm vehicles and HGV's as well as private cars) during construction.

We are not against renewable energy development on principle and would support consent for the planned offshore wind turbines along this coast, but we firmly believe the applications for EA1N and EA2 should be rejected and an existing brownfield/ industrialised site should be chosen for the onshore grid connection in line with the government's stated commitment to the protection of our AONB's and this country's threatened natural environment.

Integrated offshore solutions which would minimise connections onshore should also be investigated so that wind energy targets can be met without this wholesale destruction of a precious and unique area of England. Yours sincerely,

Bernard and Jane Bence

[REDACTED]
[REDACTED]
[REDACTED]

From: Alan Bullard [REDACTED]
Sent: 06 October 2021 10:59
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Subject: Application by Scottish Power Renewables for the EA1N and EA2 Windfarms

Dear Mr Kwarteng,

Application by Scottish Power Renewables for the EA1N and EA2 Windfarms

I am writing to you concerning the application from Scottish Power Renewables for their EA1N and EA2 projects, and to start with I would like to confirm that I am fully in favour of windpower as a primary energy source: I welcome the Offshore Transmission Network Review and I am pleased to see that Government is taking on board the concept of green energy.

I believe the recommendation of the PINS Examining Authority on the EA1N and EA2 proposals will be dropping on your desk sometime this week – I, as a resident of Friston and as someone who cares for the countryside and the environment, made several representations as the enquiry proceeded, and asked the Panel to consider recommending a split decision – consenting the off-shore aspects but not the on-shore ones.

Just to flesh this out a little:

The offshore proposals will provide some limited permanent employment, which could be particularly beneficial to areas of larger population such as Lowestoft and Great Yarmouth, and are a proven and efficient way of energy production.

The onshore proposals will provide no permanent employment, and will have a serious adverse effect on the tourist industry on which the Aldeburgh – Snape – Friston – Thorpeness triangle depends, due to the positioning of the landfall, the cable route, and the substations.

In 2020, the Offshore Transmission Network Review encouraged energy companies to opt in to Pathfinder projects to share resources. Scottish Power was invited to do this, but it declined.

During the course of the Examination it slowly became clear that National Grid had their own plans for the Friston site to become the basis of a connection hub for a number of offshore projects, opening the site to offers from Nautilus and Eurolink, UK Grid connectors SCD1/2, and quite possibly Five Estuaries and North Falls. The start of this process has now been confirmed by the launch by National Grid in September 2021 of the Nautilus consultation, linked to the SPR proposals for the Friston site, with those of Eurolink and SCD1 to follow next year.

However, it was only at the late stages of the extended examinations that Scottish Power, under pressure from the examining authorities, carried out the most cursory exercise to assess some, but far from all, of the impact from the NGV projects proposed to connect at Friston. Cumulative impacts of NGV and other projects which may well connect at Friston have still not been properly assessed. National Grid have taken a back seat during the whole process.

And, of course, there is also the proposal for Sizewell C in the same geographical area. It is bizarre that so many offshore projects are being proposed in the same area as such an important project as Sizewell C. I'd like to draw attention to two quotes: '*Scottish Power Renewables recognises the critical importance of the local environment*' (April 2021, SPR website) and from Boris Johnson in Parliament (Hansard, 19 May 2021): '*My hon. Friend is spot on in what he says about the need for an offshore grid. As well as building the fantastic windmills, it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency.*'

I would suggest that SPR's and National Grid's proposals, particularly when we take account of the cumulative impact, do not meet these criteria. At the landfall, the cables would come ashore at a well-known beauty spot north of Thorpeness (where the cliffs are quite unstable). Then the cable corridor would be routed through beautiful heathland, close to habitation and right across the AONB in a motorway-wide trench, ending with the large ugly substations on a greenfield site very close to the village of Friston, blocking a traditional pilgrims path and viewpoint of the church (see next paragraph) and causing unimaginable worry to the residents regarding noise pollution, light pollution, and flooding, quite apart from the obvious damage to the tourism industry on which the area depends.

Of the substation siting proposal, Historic England said in their submission that the removal of the ancient pilgrims path which forms a link between two listed buildings, the church and Little Moor Farm to the north, would produce a '*very high degree of harm*' to the setting of the church. They conclude that '*We remain of*

the view that heritage aspects were not given due weight by the applicant in the site assessment process, and therefore the contribution that this land makes to the significance of the designated church was not fully considered'.

To conclude, a National Grid connection hub at Friston might result in cost-savings, but an application for such a hub has not been brought forward other than by stealth under cover of the SPR projects. Certainly there has been no assessment of the **environmental damage** it will cause. In any event Friston is not the place for a connection hub, as it is a greenfield farmland site, very close to a quiet mediaeval village, surrounded by listed buildings, and the **cumulative impact** of these proposals including multiple landfalls at Sizewell have not been considered. These proposals will provide far more disruption and permanent damage to this area than was apparent when the plans were first drawn up, and the consenting of SPR's onshore proposals would open the gateway to a connection hub, which would clearly have a severe adverse effect on the impact on the countryside, the community, and its heritage.

I would therefore like to ask that you consider either rejecting these proposals or make a **split decision**, consenting the offshore proposals but not the onshore ones, and asking Scottish Power and National Grid to come back to you with a proposal which will preserve the green environment – using offshore grid connections with the landfall at a brownfield site, for example Bradwell. Thank you very much. Kind regards,

Alan Bullard

[Redacted signature block]

[Redacted signature block]

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PROPOSED NATIONAL GRID SUB-STATION AT FRISTON, SUFFOLK

Sir,

6th October 2021

It is well understood that alternative forms of energy are required to combat climate change and to meet the government's targets, but it beggars belief that an area designated as one of outstanding natural beauty should be sacrificed on the alter of expediency and to convenience the requirements of the National Grid.

If implemented, this proposal would affect the lives of thousands of people, not only those who live in the vicinity but also the many who visit regularly what is known as The Heritage Coast. [Some Heritage Coast if, as seems possible, it becomes the home of the largest 'energy hub' in Europe !]

Friston is in the centre of a much loved landscape area, predominately farming but adjacent to the very popular seaside towns of Aldeburgh, Thorpeness, Orford and also Snape with its world famous concert halls.

The proposal would see, within close proximity to these settlements the construction, on a greenfield site, of a Converter station at Friston with a footprint three times the size of Wembley Stadium and a height of 25 metres in a beautiful East Anglian landscape.

No concrete reasons seem to have been forthcoming as to why this huge complex [and if built would inevitably be expanded] could not be best accommodated in an industrial area or at the very least, on a brown field site.

I would urge you on behalf of the thousands of people who hold this part of East Anglia dear, to agree the installation of off-shore turbines but to demand the reconsideration by National Grid of the onshore infrastructure including the very damaging cable corridors. Not to do so would see a vast area blighted for ever.

Yours faithfully,

Graeme Fraser Steele

A large black rectangular redaction box covering the signature area.

From: [REDACTED]
To: secretary.state@beis.gov.uk
Cc: minister.state@beis.gov.uk; [REDACTED]; offshore.coordination@beis.gov.uk; info@nautilusinterconnector.com; [REDACTED]
Subject: Rural Destruction in East Suffolk
Date: 06 October 2021 17:11:07

Dear Secretary of State

I am writing to express my concern over the planning applications for ScottishPower Renewables' two offshore wind projects, and the National Grid Ventures' launch of their Nautilus Interconnector consultation process.

These combined energy infrastructure projects will lead to mass industrialisation in a currently unspoiled, protected, rural part of Suffolk Coast and Heaths. The area is rich in wildlife and has a thriving nature-based tourism economy. The destruction caused by the gouging of multiple cable corridors, 9 kms inland from the coast to the proposed Energy Hub at Friston, will be devastating.

We are only too aware that the countryside surrounding Sizewell C, once construction begins, will be changed for ever. The footpaths and bridleways between Eastbridge and Leiston, where people now visit the beach, exercise their dogs, take country walks, go birdwatching, cycling and horse riding, will be wiped out by a new access road, a new railway link, borrow pits and workers' accommodation units. It will become a no-go area.

It cannot be right that another neighbouring part of Suffolk Coast and Heaths could be allowed to go the same way.

If SPR is given the go ahead, the Nautilus Interconnector cable route and converter station will inevitably gain consent. This would mean that communities at Theberton, Kelsale, Leiston, Sternfield, Snape and Saxmundham will also be affected, as well as the rural village of Friston where the energy hub on a massive scale is planned.

I have no objection to the offshore turbines being given consent. However, I feel strongly that the onshore infrastructure applications should be rejected until more suitable locations (brownfield or industrial sites) can be found. I understand that our local MP The Rt Hon Dr Therese Coffey has backed the 'split decision' suggestion.

It must be possible to integrate these various offshore projects in order to minimise the disruption of the resulting onshore connections. This would be more inline with the Government's stated intent that these projects should contribute positively to climate change.

Yours sincerely
Janet Harber, East Suffolk resident [REDACTED].

From: Charles Manning [REDACTED]
Sent: 06 October 2021 16:00
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Subject: Pending DCO for SPR EA1 north and EA2. Suffolk coast

Dear Minister of State,
Please find time to read the attached letter before making your decisions on the above.

Thank you.
Charles Manning
Retired managing director
Energy companies. Scandanavia.

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The Right Hon. Kwasi Karteng. MP BEIS Secretary of State.

Dear Secretary of State,

Proposed Scottish Power (SPR) East Anglia One north and Two windfarm infrastructure.
Pending Development Consent Order. (DCO)

You will have received plenty of relevant letters pleading the case to restrict the industrial development of the coastal area of Suffolk adjacent to Sizewell C. This is not another one.

It is very obvious that the UK needs carbon free energy and the sooner the better. However, before making the decision, please question those parties involved on the following three important aspects of the projects that you are, and will in the future, be asked to approve.

1. There is enthusiasm for projects by SPR (more than one over time), National Grid ("Nautilus" and more in due course), EDF and others that the risk of project constipation is very high. It will mean delays, and add to their costs. The environmental impact will also be significant, if not overwhelming.

Where is the evidence that these companies have discussed with each other their timetables, availability of skilled manpower, road/rail transportation forecasts, accomodation over 5 - 15 years, impact on local community services (schools, medical, law enforcement)? Have you seen a separate and consolidated document on the above?

2. Have you been shown the plans and budgets for the upgrading of local roads to cope with the various transport arrangements demanded by the huge, yes huge, scale of materials and labour required if any of the projects run concurrently, which we understand is the intention. Talk of benefits to the local economy is great but the local economy is agriculture, tourism and alot of retired folk who will not be suitable for such projects.

3. It seems clear that the above companies are timing their projects announcements to avoid the fact that too much is planned for such a small geographical area. Approving a DCO for SPR in isolation would be to miss seeing the bigger picture.

Number 4 is for you. Have you visited the Suffolk coast? Seeing for yourself (by helicopter) the geography and scale of what is proposed would be rewarding. Please find a day to do so and **this letter is also to invite you to visit a local community.** Have the chance to ask and answer questions relating to the above.

yours sincerely,

Charles Manning
Retired managing director of energy companies in Scandanavia.



From: alan thomas [REDACTED]
Sent: 06 October 2021 17:27
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Subject: DCO Consent for EA1N & EA2 Offshore Windfarms

For the attention of:

The Rt. Hon. Kwasi Kwarteng - Secretary of State for Business, Energy, and Industrial Strategy (BEIS)

Dear Secretary of State,

As a resident of East Suffolk living in Friston, I write to you to express my profound concerns regarding the application by Scottish Power Renewables (SPR) for Development Consent Orders (DCO) for the EA1N and EA2 windfarms. The Planning Inspectorate (PINS) concluded its examination of these applications on 06 July 2021, and allowing 3 months for preparation of the formal report, you should receive shortly its recommendation.

The nature of the PINS recommendation is not known to me and will remain so until January 2022, but I urge you to reject the Applicant's proposal on several grounds related to the unsuitability of the site, (*see my Deadline 13 Submission referenced below*), but here arguing primarily on the grounds of cumulative impact. Most local residents of this small coastal area of East Suffolk are, like myself, in favour of offshore renewable energy, but are alarmed by the growing nature of the onshore infrastructure that is needed to interface that power with the UK National Grid. This aspect rarely attracts proper attention at Governmental level, as developers are always keen to restrict their visuals to those showing turbines out at sea. It needs to be recognised by decision makers at all levels, that every additional GW (gigawatt) of offshore power requires yet another onshore converter station and a substation to connect the power to the UK National Grid. Whilst the declared Government objective of 40 GW of offshore wind power by 2030 may appear laudable to many, it is likely to present a massive burden upon coastal communities, particularly if developers persist with the current system of individual radial connections in line with National Grid's Connection and Infrastructure Options Note (CION) regime, which seems to be completely outside the current NSIP examination process. To reach the 400 kV overhead transmission line system, each developer needs to excavate a separate motorway-width trench across farmland, public footpaths and roads from shore to the converter station needed to bury safely the power cables. A series of buried cable junction chambers and cable sealing ends is also required.

This area of East Suffolk is already host to the Sizewell B Nuclear Power station and onshore substations for the Galloper and Greater Gabbard wind farms, but appears now to be required to accommodate a raft of future energy developments, namely:

- Sizewell C Nuclear Power Station
- Five Estuaries Windfarm (Galloper Extension)
- North Falls Windfarm (Greater Gabbard Extension)
- Nautilus and Eurolink trans-North Sea interconnectors
- Sizewell to Kent grid reinforcement links SCDA 1 and SCDA 2

The Sizewell C DCO Examination is scheduled to end shortly, and non-statutory consultation for Nautilus has already begun. The cumulative effect of so many energy projects being located in such a small local area is unprecedented and amplifies the a view held within BEIS that the current NSIP-DCO process, which evolved some 10 years or more ago, is now no longer fit for purpose. In human terms, for many of those living in this area, the cumulative burden could prove intolerable and prejudicial to health. I again urge you to view the DCO application through the prism of cumulative impact and reject the onshore element of the SPR development, while leaving, if practicable, the offshore element to progress.

Yours truly,
Alan Thomas (PINS Reg ID - 20024089) [RR-804]

Reference

PINS Document EA1 North Windfarm – Documents

Page 1 of 345, Entry 10 - Deadline 13 Submission (.pdf) Published 06/07/2021

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From: Melissa Baker [REDACTED]

Sent: 07 October 2021 16:46

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED] COFFEY, Therese

[REDACTED] Offshore Coordination [REDACTED]

Subject: Applications for EA1N & EA2 - Split Decision Recommendation - FAO The Rt Hon Kwasi Kwarteng MP

Dear Minister

I am writing to ask you to please recommend a split decision re the applications for EA1N and EA2.

A split decision will give the government an opportunity to :-

1. An opportunity to choose a grid connection on a brownfield site - The current proposed site is an unspoilt protected area, rich in wildlife and has an important nature - based tourism economy.
2. An opportunity for a grid connection to be chosen in line with the government's commitment to protect our AONBs and natural environment
3. An opportunity to nurture and grow the Suffolk Heritage Coast's iconic but fragile nature-based culture and tourist economy
4. An opportunity to facilitate the timely consent not only of EA1N and EA2 but future projects, like Nautilus, planned to connect in the area. This would avoid the costly and lengthy Judicial Review process as has been experienced in Norfolk.
5. An opportunity to pilot an East Anglian 'Pathfinder' project with integrated offshore solutions which would minimise connections onshore
6. And ultimately the opportunity to get this right from the beginning and accelerate the government's wind energy targets.

Only if offshore infrastructure minimises the destruction of plant life by connecting to the grid at a brownfield/industrialised site could these projects contribute positively to climate change and support the Government's stated intent in this regard.

Thank you for your time.

I urge you to please do the right thing.

Yours sincerely, Melissa R Baker

From: info.aepasuffolk@gmail.com <info.aepasuffolk@gmail.com>

Sent: 07 October 2021 09:10

To: KWARTENG, Kwasi [REDACTED]

Subject: EA1N & EA2 DEVELOPMENT CONSENT DECISION -NEW INFORMATION ON CUMULATIVE IMPACT

Dear Kwasi Kwarteng,

RE: EA1N AND EA2 DEVELOPMENT CONSENT DECISION - NEW INFORMATION ON CUMULATIVE IMPACT

We are writing to alert you to important new information relating to Scottish Power's applications for development consent to East Anglia One North and East Anglia Two windfarms, on which you will decide shortly. We believe this new information must first be considered in order to avoid potential judicial review.

Background:

The Planning Inspectorate's Examining Panel for these applications made persistent attempts to obtain from the Applicant Scottish Power and from National Grid details of all further planned developments that would or could have adverse impact on the local environment and community, when combined with the Applicant's proposals. This information was withheld, and therefore the Inspectorate could not supply you with a complete account of the likely cumulative impact.

As soon as the examination was closed, National Grid made public details of further planned development which would have enormous adverse cumulative impacts, as set out below. This information could and should have been provided to the Inspectorate. Nevertheless it is now available to inform your decision.

Cumulative impacts of new development:

The new information about the Nautilus Interconnector project, would have the following effects when combined with the EA1N and EA2 proposals:

- It would extend the AREA of building on rural greenfield land by hundreds of hectares- It would extend by years the TIMELINE of local construction and disruption.
- It would increase the SCALE of development by thousands of cubic metres, with industrial buildings larger than any previously proposed.
- It would excavate yet another RADIAL CABLE ROUTE from the seashore through an Area of Outstanding Natural Beauty, in direct contravention of Government policy expressed in the Energy White Paper. - It would cause further lasting DAMAGE TO TOURISM on which our local economy relies.

Recommendation:

A development of this magnitude, if known to the Planning Inspectorate, would have been a major consideration in its assessment of cumulative environmental and community impact. We therefore ask respectfully that before you make your decision on EA1N and EA2 you take account of this new data – for example by requiring the Inspectorate to review it and report to you in a timely manner. We can provide relevant material if necessary.

We have copied this letter to our Member of Parliament, your Cabinet colleague Dr Therese Coffey, who has taken a keen interest in these proposals and would we believe be reassured by your willingness to consider this new information.

Yours sincerely,

Graeme Murray, Chair
Anglian Energy Planning Alliance

Copy to: Dr. Therese Coffey



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From: Andrew Coxon [REDACTED]
Sent: 07 October 2021 09:37
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>;
[REDACTED]
Cc: minister.state@beis.gov.uk; [REDACTED]
[REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>;
[REDACTED]; Offshore Coordination
<offshore.coordination@beis.gov.uk> Subject: Mass Energy Industrialisation Planned for Suffolk
Coast and Heaths

Dear Ministers and Responsible Persons,

You are all in positions of great trust and you alone can steer the minds of many who might get it wrong , to do the right thing . All of us appreciate your concern for the rare and beautiful Green countryside and your due diligence on our behalf .

Please choose instead a grid connection on a brownfield or industrialised site which has the long term capacity to act as a wind energy hub. The Split Decision I believe it is called.

You would facilitate the timely consent not only of EA1N and EA2 but future projects , like Nautilus and avoid the costly and lengthy Judicial Review process which has happened in Norfolk.

Our whole family in Aldeburgh wishes you well in your desire to accelerate your wind energy targets and assures you of our support if you will avoid the green fields and choose the brown field or industrial site options which have been identified instead of what is currently proposed.

Thank you for your kind consideration,
Yours sincerely,
Andrew Coxon

[REDACTED]

From: [REDACTED]
To: secretary.state@beis.gov.uk
Cc: minster.state@beis.gov; [REDACTED]; [REDACTED] offshore.coordination@beis.gov.uk;
info@nautilusinterconnector.com;
info@suffolkenergyactionssolutions.co.uk; info@saveoursandlings.org.uk; saveeastsoffolk@outlook.co
Subject: Stop mass industrialisation of Suffolk
Date: 07 October 2021 08:54:03

Dear Secretary of State,

I am writing about the Nautilus Interconnector consultation process by the National Grid combined with the

Scottish Power Renewables now the subject of a planning application.

Overwhelmingly, the proposed development is in the wrong place.

It is totally illogical to plan to vandalise an area of Outstanding Natural Beauty.

It should never have been considered.

The government has committed to protect our AONBs and the natural environment.

Brownfield, already industrialised, sites are available for the connection of the wind turbines onshore.

Possible sites include Bramfield or Clacton.

The scale of the development and the consequent impact on the local community in East Suffolk would be massive.

The local economy is dependent on tourism: this would collapse with the extensive earthworks

planned to service the substation at Friston, including road building.

There are cultural activities of international proportions at Snape and events in Aldeburgh.

Visitors come from all over the world. The destruction proposed would seem incomprehensible.

No civilized country would contemplate this.

I urge you to reject the planning application for these onshore developments at this location.

Yours sincerely,

Peter Dickinson

Professor Peter Dickinson

[REDACTED]

From: [REDACTED]

Sent: 07 October 2021 10:15

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Re the offshore turbines planned in suffolk.

Dear Sir,

I support the building of more wind turbines in the sea off the east Anglian coast however, I do not support their being brought on shore to Leiston or thereabouts. This area is not a brownfield site and would be detrimentally affected by this plan affecting locals who live there, people who go for recreation and of course the wildlife. The most sensible decision your office could come to would be a split decision whereby turbines were approved off but a proper brownfield site would be need to be found. Further, I understand that in the Netherlands they have build central power collecting points out at sea so that only one point going inland is necessary. That sounds less disruptive too.

Yours sincerely

Lucinda Palmer

Sent from my iPhone

From: SEAS

Sent: 07 October 2021 20:30

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: the use of compulsory purchase as leverage to extract collateral/unacceptable conditions

Please find attached a Submission for the Rt Hon. Kwasi Kwarteng MP, Secretary of State for the Department of Business, Energy and Industrial Strategy, in relation to the applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia One North and East Anglia Two. [SEAS_SOS_NDA_071021Final.pdf]

The following two additional pdfs (which are referred to within this Submission) are also attached:

i) Supplementary Submission to the SRA concerning the involvement of solicitors in applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia One North and East Anglia Two, SEAS, 9 September 2021.

[SRA_Complaint_09Sept2021.docx-2.pdf]

ii) Submission to the SRA concerning the involvement of solicitors in applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia

One North and East Anglia Two, SEAS, 17 June 2021. [SEAS_SRA_170621.pdf]

We would be very grateful if you could ensure that this material is brought to his attention.

We would be happy to provide any further required information.

Yours sincerely

Fiona Gilmore

The SEAS Team

info@suffolkenergyactionsolutions.co.uk

www.suffolkenergyactionsolutions.co.uk

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

Supplementary submission to the SRA concerning the involvement of solicitors in applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia One North (EA1N) and East Anglia Two (EA2)

9th September 2021

A. Introduction and context

Context

1. The SRA has indicated that it is taking the SEAS complaint against the solicitors acting for SPR to the next stage. We understand that the SRA will revert with an update in October. Since the first complaint some important developments have occurred.
2. This submission provides an update and elaboration of the first complaint. We remain ready to provide whatever additional information or clarification the SRA seeks from us.
3. The Examining Authority (the Inspectors) are due to report to the Rt Hon Kwasi Kwarteng MP, the Secretary of State for the Department of Business, Energy and Industrial Strategy in or about early October in relation to the applications by ScottishPower Renewables (SPR) for consent on applications East Anglia One North (EA1N) and East Anglia Two (EA2). The Secretary of State has three months thereafter in which to make a decision. It is therefore anticipated that the Secretary of State will issue a decision in or about early 2022.
4. The SRA should be aware that very recently the Review Team instructed by the Secretary of State for the Ministry of Housing, Communities and Local Government (MCLHG), The Rt Hon Robert Jenrick MP, has written to SEAS asking it to address the issue of the use of gagging and other restrictive clauses in the context of a review that it is undertaking into national infrastructure projects and planning. SEAS will lodge submissions in the latter half of September and will inform the Review Team of the SRA Complaint.
5. The applications for consent concern offshore wind turbines the power from which is, under the applications, due to be landed at the fragile and crumbling Sizewell cliffs and then run in a cable for about 9km through the Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the Sandlings SPA (Special Protected Area) and the villages of

Thorpeness and Aldringham to end at substations, two and a half times the size of Wembley Stadium, located in the heart of the ancient village of Friston in rural Suffolk.

6. The site cuts across medieval pilgrim paths which link Friston to adjacent villages and churches. The area is one of outstanding natural beauty. It is close to the famous Benjamin Britten Concert Hall at Snape and to the coastal resort of Aldeburgh.
7. There is no precedent for the placing of structures this vast and overwhelming in a residential setting surrounded by ancient farmland. The substation is planned to be one of the largest ever installed in Europe. The development will decimate the village of Friston and its local environment.

Widespread opposition from across the region to the applications

8. Not surprisingly the applications have engendered fierce opposition from a multitude of political, community and commercial groups from along the entire East Suffolk coastal region.

SPR's strategy of neutralising opposition

9. Knowing that its applications would be controversial and opposed, SPR set out to neutralise opposition by those most directly affected. This included all those whose land SPR needed to acquire or gain access to. Given the scale of the development this amounts to a large number of landowners, and it includes certain local authorities.
10. SPR implemented a legal and commercial strategy of exploiting the enormous legal leverage that the compulsory purchase regime confers upon it. Under that regime SPR is entitled to purchase and obtain access to land that it needs to implement any consent given by the Secretary of State. Landowners have no real freedom of contract. They are not free to refuse to deal with SPR. The whip hand lies with SPR.
11. In the ordinary course, the use of compulsory purchase powers is conditional upon, and therefore subsequent to, the grant of development consent. It arises when the planning process has completed.
12. However, a practice has emerged of applicants for development seeking to enter agreements with landowners prior to consent. Developers are willing to pay a premium for these pre-consent agreements because it accelerates the development if consent is subsequently given. There is no objection in principle to developers seeking pre-agreement in this manner.

13. However, there is objection to developers using this statutory power as a device secretly to subvert and undermine the planning process.
14. The decision to grant or refuse consent is dictated by planning legislation and is governed by ordinary public law principles. These demand that planning decisions are objective, fair and transparent. Those affected by the proposed development have a statutory and common law right to give evidence to the Inspectors.
15. When Parliament enacted the compulsory purchase regime it was not contemplated for a moment that the system could be distorted by developers to undermine the planning process.
16. SPR set out, deliberately, to subvert the entire planning process. It did this by exploiting the existence of compulsory purchase powers to prohibit relevant landowners from *participating* in the planning process. Full details are set out below. This meant that directly affected parties could not submit written representations to the Inspectors, attend oral hearings and give evidence or support and fund opposition groups. The SPR strategy extends beyond the proceedings before the Inspectors and covers subsequent submission to the Secretary State and any resultant court proceedings.
17. SPR's strategy, seemingly created and implemented by its lawyers, is a direct assault on a process governed by public law.
18. SPR's strategy of neutralising opponents was reinforced by the imposition of confidentiality and gagging bans on landowners. The entire process was always intended to be covert and secret. Indeed under SPR's terms affected parties would have to lie and dissemble if asked about the reasons why they had not given evidence. It was never intended that the Inspectors, the Secretary of State, or the courts should ever come to learn about this strategy.
19. All of this is incontrovertible. It flows out of documents drafted by the lawyers for SPR and used in the course of these proceedings. It is set out in black and white terms.
20. It was by chance that over the course of the inquiry, these documents came to the attention of groups opposing the applications.
21. SPR's strategy was rigorously implemented by SPR, its land agents and its lawyers.

B. **The facts**

The first complaint made to the Inspectors

22. It was chance that brought SPR's strategy to light. It emerged because at an early point during the proceedings a landowner whose land SPR wished to obtain access to, objected to SPR's attempt to gag him and prevent him from giving evidence hostile to SPR during the inquiry. Dr Alexander Gimson is a trustee of an important local charity, the Wardens Trust, which is situated on top of the cliffs at Sizewell and is literally metres from where SPR intended to land the cable from the turbines. The Wardens Trust provides respite care and other services to those with physical and mental disabilities. It is a collection of buildings that do not however have an independent water supply. It relies upon being able to access water from the aquifers that run under the ground here. The unequivocal evidence of Dr Gimson is that if the cables are landed as planned it will radically damage the underground aquifers and that in any event the development will represent an existential threat to the entire charity, the defining feature of which is a peaceful haven for those who visit. SPR needed access to his land in order to conduct underground tests. They sent him a copy of their standard form agreement. This contained the full array of clauses prohibiting him from giving evidence to the Inquiry and gagging him. They offered over £50,000 to induce him to agree to these clauses. He refused to agree. He then made public the draft agreements. He drew the SPR documentation to the attention of opposition groups and to the Inspectors.

23. This led Suffolk Energy Action Solutions (SEAS) to make a complaint, based upon what was at this point in time limited evidence, on 14th February 2021 in which it was alleged that SPR was using agreements to require landowners to refrain from assisting the Inspectors and to withdraw their objections to the applications for planning consent.¹

SPR's application to have evidence of SPR's misconduct removed from the record

24. In light of the SEAS complaint SPR emphatically denied that it had any such policy². It went public with its denial and procured an article in the national press (The Telegraph) in which it repeated the denials.³

¹ Letter of Complaint to the Inspectors, SEAS, 14 February 2021 [Link](#)

² As recorded at page A2 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

³ On 28th February 2021, journalist Rachel Millard wrote an article in the Telegraph about the SEAS complaint. A spokesperson for SPR denied both that SPR had entered into any agreements of the sort complained about or that it would ever seek to undermine a planning process. ■■■■

25. Before the Inspectors, SPR's legal team personally attacked those who said that such a strategy existed, including Dr Gimson.
26. The SPR legal team (Shepherd & Wedderburn) then made a formal application to have the evidence of the alleged misconduct of SPR removed from the record upon the basis that, under the procedural governing rules, the evidence was “*vexatious*” and misleading. If the application succeeded the effect would be that the Inspectors would in effect expunge the evidence from the record.⁴
27. SPR’s lawyers, in their oral submissions, stated to the Inspectors that when they had the “*full facts*”, they would reject the complaint. The legal team represented that they would be providing the “*full facts*” i.e. full and comprehensive evidence to refute the complaint of misconduct by SPR⁵.
28. As became clear when this representation was made, SPR’s legal team must have known that the complaints against SPR were justified and that denials on its behalf were false. It is reasonable to infer that when they made this submission, they had no intention of providing the relevant evidence.
29. The Rt Hon Dr Therese Coffey MP and local councillors gave evidence before the Inspectors emphasising the critical importance of ensuring fair and open processes. Dr Coffey has expressed the view to the Secretary of State that in her view the SPR’s strategy involved “*sharp*” practice.
30. At a hearing on Friday 19th February the solicitor for SPR, Mr Colin Innes, attacked SEAS’s complaint (of 14th February) as inaccurate and bordering on vexatious. Speaking on behalf of SEAS, Mr. Fincham, a retired City solicitor, rejected that argument. However, he properly made clear that SEAS would reconsider its position in the light of any submission and evidence which would be made by SPR in response to the SEAS complaint, especially since the SPR legal team had represented that it would provide the “*full facts*”. Mr Fincham pointed out that Dr

⁴ The Applicants’ Response to SEAS Complaint, SPR, 4 March 2021 [Link](#)

⁵ At Issue Specific Hearing 9 Session One on 19 February 2021, SPR indignantly stated that once the Examining Authority had seen the “*full facts*” and all the “*material*” it would reach a very different conclusion on SEAS “*supposed complaint*”. Colin Innes, the solicitor leading for SPR stated: : “*All I would say is that again it should be based on full facts of the particular circumstances that have been alleged. And in my submission, once you have read that material, I believe that you will reach a very different conclusion from that which has been submitted to you by SEAS in terms of their supposed complaint.*” Transcript [Link](#). Recording [Link](#)

Gimson had given evidence that he was offered a sum in excess of £50,000 to withdraw his evidence.

31. SEAS then set out what evidence it thought SPR should provide: (1) a statement detailing all payments agreed or offered to interested or affected parties, charities, local authorities or other bodies or individuals; and (2) disclosure of all relevant material including concluded agreements, draft agreements or other documents containing or evidencing offers, and emails sent or received by SPR, or those acting for it, relevant to payments agreed or offered.⁶

32. SPR's lawyers were on notice as to exactly the sort of evidence that they should provide to support their application that those opposing SPR were formally "vexatious", within the procedural rules.

The Inspectors decision 22nd February 2021

33. On 22nd February 2021 the inspectors issued a decision (the Decision) on the application made by SPR's lawyers to exclude the complaint by SEAS and others.

34. The Inspectors rejected SPR's application and held that the complaints would be retained on the record.⁷ The Inspectors rejected the application that the complaint by SEAS and others was vexatious. They added that SPR would be given a full chance to respond to the complaint.⁸

35. In the Decision the Inspectors recorded the facts including that SPR had denied using agreements to gag opponents and prevent participation in the planning inquiry. It also noted that SPR had challenged those who had made allegations against SPR as "vexatious". It recorded the submission of the Rt Hon Dr Therese Coffey and others about the importance of fair and open proceedings.

36. The Inspectors made the following important points.

37. First, they recognised that no one should take steps to "*raise any reasonable apprehension in the minds of affected persons that they are to be prevented from enjoying their statutory rights of participation in these*

⁶ An Additional Submission following Issue Specific Hearing 9, SEAS, 22 February 2021 [Link](#)

⁷ As recorded at pages A3 and A5 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

⁸ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

*Examinations or that their related human rights are not being responded to”.*⁹

38. Secondly, they observed that “*Allegations of misconduct should not be made unless they can be clearly substantiated*”¹⁰.

39. Thirdly, they made the following observations about the critical importance of affected persons having a full and fair right to make representations: “*It is not in the public interest that there should be an enduring apprehension on the part of an Affected Person that they might be prevented from participating in these Examinations to raise their outstanding planning merits objections*”¹¹.

40. The Inspectors also observed that evidence had come to light that SPR was using contract terms to gag potential objectors and prevent them from participating in the inquiry.

41. The Inspectors stated of the complaints: “*They raise a general point of public interest*”.

42. Having decided that they would not reject the SEAS complaint and that of others about SPR it also stated that it would not take a “*concluded position*” on the substantive merits of the complaint until SPR had made its submission and submitted relevant evidence (as it had promised to do).¹²

43. The Inspectors reminded everyone that they should “*diligently review factual material*” and confine remarks to facts “*which they know to be verifiably true*” and to “*provide evidence where necessary*”.

44. The Decision is important since it made clear the Inspectors views and, in particular, that they considered the issue to be of general public importance and that it was incumbent upon the SPR legal team now to diligently review the factual material and provide the relevant documentation.

⁹ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁰ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹¹ As recorded at page A4 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹² As recorded at page A4 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

The response of the SPR legal team

45. Various submissions were subsequently made by SPR and also by affected persons. These included what is now the Main SEAS Submission. This drew together all of the facts and evidence relating to SPR's strategy and set out a detailed legal analysis. It also provided references to the extensive evidence of opposition to SPR on this issue from residents all over the region.¹³
46. In the light of this SPR's solicitors did not submit any evidence about SPR's agreements, about its negotiations with landowners, about the payments made to affected persons to prevent them from participating and to buy their silence, etc.
47. The legal team adopted a minimalist strategy lacking any semblance of transparency, even though the Inspectors had held that SPR should provide relevant evidence and that this was an issue of public importance. SPR's legal team took steps by both commissions and omissions to keep the Inspectors in the dark.
48. All of the legal submissions of the SPR team are linked.¹⁴
49. The legal tactic was to withhold relevant documents and thereby to stonewall. It must surely have been obvious that were the legal team to disclose the relevant material to the Inspectors that this could have very serious adverse consequences indeed.
50. Not only did the legal team not place relevant material before the Inspector but they compounded their omissions in an extraordinary manner. In a later legal submission, the lead solicitor acting for SPR, Mr Innes, during a hearing relating to issues concerning compulsory purchase, sought explicitly to rely upon the *absence* of opposition from landowners as evidence that they all supported SPR's applications¹⁵. This submission was made on 18 March 2021.

¹³ Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)

¹⁴ The Applicants' Response to SEAS Complaint, SPR, 4 March 2021 [Link](#) The Applicants' Response to SEAS Complaint, SPR, 15 April 2021 [Link](#) The Applicants' comments on SEAS NDA Complaint, SPR, 6 May 2021 [Link](#)

¹⁵ Details are set out in Compulsory Acquisition Hearing 3, Session 4, 18 March 2021 Transcript [Link](#) (page 7) Recording [Link](#) (17.5 minutes in)

51. SPR's solicitor legal team thus sought to rely upon the malign effects of their gagging and non-opposition strategy to seek to obtain material forensic advantage during the planning process and to represent that those who had been gagged were in fact supporters of SPR's applications. It is inconceivable that this submission could have been made if the lawyers had disclosed the relevant documentation to the Inspectors.

The position in relation to the Sizewell C inquiry

52. Inquiries have established that EDF, the applicant for consent at Sizewell C for the construction of a new nuclear power generating plant, does NOT use comparable or equivalent gagging and non-participating clauses in its dealing with landowners in relation to the ongoing inquiry into Sizewell C. The Sizewell inquiry is comparable in that it concerns a development which will be very close in terms of proximity to the present cable route and substation and involves many of the same affected persons and some of the same types of argument (e.g. about the cumulative impact of multiple energy projects in the region). The use of such tactics as SPR and its legal team deploys are not part of normal planning processes conducted fairly and transparently, in good faith and in the public interest.

The present position viz a viz the inquiry

53. For the sake of completeness, the Inspectors never proceeded to take a final decision on the issue of gagging and non-participation clauses. This is the subject of a quite discrete complaint which is being made to the Secretary of State, though it remains a possibility that the Inspectors will address the issue in their final recommendations to the Minister. However, this will not be made available until such time as the Secretary of State takes the final decision on the planning applications. This is likely to be at the start of 2022.

C. Details of the SPR strategy

The core facts are incontrovertible

54. The basic facts relied upon are incontrovertible. They flow from documents emanating from SPR. The prohibitions are set out in black and white. There can be no scope for any argument or debate about their existence. The agreements are formal legal documents drafted by SPR's solicitors or are documents drafted by SPR's legal team and submitted to the Inquiry (e.g. in relation to Incentive Payments).

55. SPR's lawyers have prepared a series of formal legal agreements: (i) a Heads of Terms and (ii) an Option Agreement. The basic facts are as follows.

The use of pressure by SPR to obtain agreement

56. The "*full facts*", to use the expression used by SPR's lead solicitor in evidence during the inquiry, have not been easy to unearth. Affected persons have wished to remain anonymous because they fear reprisals from SPR. A number took legal advice and were advised that their agreements prevented them from speaking to SEAS or the Inspectors. They were told that they could not speak to anyone about anything. Nonetheless, a sufficient number of affected persons did come forward and provide evidence including relevant agreements and email exchanges between themselves and SPR and its agents.¹⁶

57. The Heads of Terms are intended to be used until such time as consent is given at which point it folds into the Option Agreement. The Heads of Terms contain two very different components. First, it contains the terms that SPR will agree with the landowner when consent is given. This part of the Heads of Terms is therefore forward looking and conditional upon consent. The second part is that which prohibits landowners from participating in the inquiry and which imposes upon them absolute secrecy. This part of the agreement is not prospective or conditional upon consent, but bites immediately and is designed to help SPR to obtain consent.

58. There is an enforcement mechanism in the agreement which involves the mediation of "*claims*". That can only be read as referring to "*claims*" for breach of contract and, in practice, can only realistically apply to the non-participation and gagging obligations since those are the only parts of the agreement which have immediate effect and are not conditional.

59. For at least 9 months before the Examination commenced SPR set out to use the leverage it held through the compulsory purchase legislation to sign up all landowners whose land SPR might either need to purchase or obtain access to. Its aim was to sign up as many landowners as it could before the planning inquiry commenced.

60. SPR, by itself and through its agents, imposed pressure upon the affected landowners to sign the Heads of Terms. They told landowners that under

¹⁶ SPR took steps to identify those assisting opposing groups and strenuously remonstrated with such persons: See Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)

the Development Consent Order (DCO) statutory process, grant of approval was inevitable given the statutory presumption in favour of development. Further, they emphasised that if landowners did not sign up now SPR would force them to later, once development consent was granted, and SPR would then offer them much worse terms.

61. A number of individuals submitted evidence to the Inspectors evidencing the pressure exerted by SPR. This is recorded in the SEAS Main Submission and in other evidence contained on the Examining Authority website.¹⁷ That evidence was to the effect that those who had signed the Heads of Terms felt compelled to do so by virtue of the fact that this was a compulsory purchase procedure and that they had no option, and that this was a DCO process and therefore a forgone conclusion, in SPR's favour. One example, which was put before the Inspectors and was referred to in SEAS's submissions, was in the following terms:

“As for the matter of “negotiating” the SPR Terms of Agreement - what rubbish. We were very forcefully told at a Zoom meeting with our agent, SPR's agent and SPR's representative way back in 2020, that if we did not accept their Agreement, they would employ Compulsory Powers, and we would be entitled to only a minimum amount of compensation - we felt it was intimidation. The SPR comment that “no such agreements had actually been entered into” (The Telegraph) is a blatant lie. I know for definite two people who have told me they are tied up in Non-Disclosure Agreements and are barred from commentating on anything to do with SPR's applications. Regarding their so called “proven track record of positive community engagement”, I am still waiting for my first communication from SPR.”¹⁸

62. SEAS can provide extensive additional evidence about the pressure imposed should this be of use to the SRA. References to the relevant evidence are though already with the documents lodged with the SRA as annexes to the initial complaint.

¹⁷ Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)
National Infrastructure Planning Website, [Link](#)

¹⁸ See paragraph 100 of Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#) (the full evidence from the individual concerned is on the National Infrastructure Planning Website)

63. The following quote is from the Main SEAS Submission. It summarised the topics which were the subject matter of the evidence submitted to the Inspectors by affected parties¹⁹:

- “- the real anger felt by residents as to the harmful effect on free speech and the integrity of the planning process;
- the pressure imposed by SPR;
- the absence of free negotiation and the use by SPR and its agents of the threat of compulsory powers to secure agreements;
- the impression conveyed that NSIP processes are stacked in favour of applicants and that this is used in negotiations to secure agreements;
- the improper linkage of compulsory purchase powers to the suppression of evidence to the inquiry;
- the impact of the loss of relevant evidence collected in the inquiry;
- the propriety of lawyers advising on the use of such gagging clauses in the context of planning inquiries;
- the fact that in other local planning processes, such as in relation to Sizewell, the applicant is not seeking to impose equivalent gagging and non-opposition clauses;
- the harm being done by policies such as that used by SPR to democracy and confidence in public decision making.”

64. All of this evidence was submitted during the inquiry and SPR's legal team were therefore fully aware of it. Yet, at no time did the lawyers consider that, as the evidence mounted, it was the right and proper thing to do to come clean and lay before the Inspectors the relevant documents.

The Heads of Terms

65. SPR's strategy is evident from the terms of the agreements drafted by its lawyers.

¹⁹ See para 102 of Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#)

66.SPR uses variants of its Heads of Terms. There are some very slight differences in terminology, but these are not material. These variations were placed before the Inspectors. The basic system is the same throughout. For ease of reference we identify the objectionable clauses used by SPR as A, B and C.

67.Clause A sets out the Incentive Payments to be paid by SPR to the landowner. These payments are made:

“for signing Heads of Terms payable on completion of the Options Agreement”.

68.Clause B prohibits objections from the landowner:

“Planning Matters

The Grantor will not object to the Developer’s application for Development Consent nor any other planning application(s) associated with the Projects.”

69.Clause C imposes the gagging obligation:

“Confidentiality

These Heads of Terms are confidential to the parties named whether or not the matter proceeds to completion save that reference to them having been entered into may be referred to with the Planning Inspectorate”.

70.The Incentive Payment is a payment made only upon entering the Option Agreement demonstrating the linked nature of the two agreements. It may not be paid if the landowner breaches the agreement and participates in the inquiry or does not observe total secrecy about the terms of the agreement or fails to comply with the terms of the agreement.

71. Clause B prohibits the landowner from objecting. This covers any activity such as: putting in representations against SPR; supporting any campaigning group such as SEAS who will make representations on the landowners behalf; funding SEAS or any other opposing body or group to make representations on the landowners behalf.

72. The words “*nor any other planning application(s) associated with the Projects*” expand the prohibition to “*associated*” applications. The word “*associated*” is not defined but by definition extends beyond the applications in issue. It ensures that the prohibition upon opposition is comprehensive. It would include a prohibition on adducing objection in relation to other projects which would be relevant, for instance, to an assessment of cumulative impact.
73. The prohibition covers *every* aspect of the application for which consent is being sought and goes beyond limited objections that might relate to the landowners own parcel of land.
74. Clause C prohibits any reference to the Heads of Terms and prevents them being shown to any third party. This prohibition operates even if the matters do not proceed to completion. Once the Heads of Terms have been entered, they prevent the landowner from admitting that he had been gagged or prohibited from objecting *even if* SPR has no lasting interest in the land in question.
75. The expression in clause C “*save that reference to them having been entered into may be referred to with the Planning Inspectorate*” highlights its objectionable nature. If the Inspectors ask a landowner for details of agreements entered into or whether they have been gagged or prevented from submitting evidence the landowner must either refuse to respond or at best admit only the bare fact that Heads of Terms have been entered into. The landowner must dissemble and be uncooperative.

The Option Agreement

76. For payment to be made the landowner must enter the Option Agreement and become a grantor of rights. The prohibitions now become even tighter. The three clauses of greatest interest are as follows:

“Permissions

The Grantor shall not make a representation regarding the EA1N DCO Application nor the EA2 DCO Application (and shall forthwith withdraw any representation made prior to the date of this Agreement and forthwith provide the Grantee with a copy of its withdrawal) nor any other Permission associated

with the EA1N Development or the EA2 Development and shall take reasonable steps (Provided that any assistance is kept confidential) to assist the Grantee to obtain all permissions and consents for the EA1N Works and the EA2 Works on the Option Area (the Grantee paying the reasonable and proper professional fees incurred by the Grantor in connection with the preparation and completion of such permissions and consents).”

“Confidentiality

The terms of this Agreement shall be confidential to the parties both before and after completion of the Deed(s) of Grant and neither party shall make or permit or suffer the making of any announcement or publication of such terms (either in whole or in part) nor any comment or statement relating thereto without the prior consent of the other or unless such disclosure is required by the rules of any recognised Stock Exchange on which shares of that party or any parent company are quoted or pursuant to any duty imposed by law on that party or disclosure is required by the Grantee in connection with or in order to obtain the EA1N DCO or the EA2 DCO or any other planning application associated with the EA1N Development or the EA2 Development or any Permission.”

“No misrepresentation

This Agreement incorporates the entire contract between the parties and the parties acknowledge that they have not entered into this agreement in reliance on any statements or representations made by or on behalf of one party to the other save those written statements contained in the written replies made by the Grantor's solicitors to enquiries raised by the Grantee's solicitors.”

77. As to the Permissions clause. This states that the Grantor shall not “*make a representation regarding the EA1N DCO Application nor the EA2 DCO Application*”. This is a direct contractual obligation prohibiting a grantor from assisting the Inspectors with evidence collection. It has nothing to do with normal planning considerations which might properly be the subject of an option agreement. The Grantor cannot by itself or by using a

representative body or association, submit any evidence or make any representation of any sort during the Inquiry.

78. Further, the Grantor “*shall forthwith withdraw any representation made prior to the date of this Agreement*”. This compels any person who has already objected to withdraw that objection. The object is to ensure that any evidence unhelpful to SPR is not taken into account by the Inspectors. By way of example Dr Gimson made a series of detailed written and oral submissions to the Inspectors on a wide range of matters including medical and health related issues. If he had felt compelled to sign the SPR agreements he would then have been forced to withdraw all of his prior evidence and that would have prevented the Inspectors from taking it into account.
79. The Grantor will “*forthwith provide the Grantee with a copy of its withdrawal*”. This is part of SPR’s enforcement mechanism to ensure that SPR can be certain that the Inspectors are deprived of relevant evidence.
80. As to the expression that the Grantor “*shall not make a representation regarding ... any other Permission associated with the EAIN Development or the EA2 Development*”, this prevents the Grantor from objecting to any other part of the application to the cable (See the Definition of Permission and its linkage to the Cable as defined in the Grant). So, for instance, in the case of Dr Gimson, since the cable is due to be landed very close to his property, he would be prevented from complaining to the Inspectors about the impact upon his own property but he would also be prevented from objecting to other matters of concern to him.
81. As to the expression the Grantor shall “*take reasonable steps to assist the Grantee to obtain all permissions and consents for the EAIN Works and the EA2 Works on the Option Area*”, since permission and consent for the Option Area is contingent upon the application as a whole going ahead this would extend to compelling Grantors to assist SPR generally, even if they profoundly objected to it, i.e. it forces them to give evidence and support contrary to their true position.
82. In relation to the Confidentiality clause and the expression: “*The terms of this Agreement shall be confidential to the parties both before and after completion of the Deed(s) of Grant*”, this is a classic gagging clause; any disclosure of the agreement or its terms is a breach of confidence. The duty to preserve confidence post completion of the Deed of Grant is not limited in time. It would extend to cover any subsequent applications for

example for applications to add to the Friston site - the cumulative impact point.

83. As to the expression: “*neither party shall make or permit or suffer the making of any announcement or publication of such terms (either in whole or in part)*”, this speaks for itself: A Grantor under a gagging order cannot use third parties to circumvent the gag. It prohibits not just disclosure of the agreement but also from commenting upon it, for example to SEAS or other opposition groups.
84. As to the expression that neither party shall make or permit to make or suffer to be made “*any comment or statement relating thereto without the prior consent of the other*”, this is part of the SPR enforcement mechanism whereby it controls who can say what and to whom. If a Grantor wished to speak to SEAS or to the Inspectors it must seek and obtain SPR’s prior consent.
85. As to the fact that disclosure is allowed pursuant to any duty “*imposed by law*” on that party, a Grantor would be permitted to give evidence to the Examining Authority but only if the Inspectors imposed a legal duty upon that person to do so. There is no right voluntarily to proffer evidence.
86. Disclosure can be made by the Grantee (ie SPR) “*in connection with or in order to obtain the EAIN DCO or the EA2 DCO or any other planning application associated with the EAIN Development or the EA2 Development or any Permission.*” SPR can selectively disclose the terms of the agreement and, importantly, parts of it if it helps its case. But under the agreement it is under no obligation to disclose the whole of the agreement since this would allow sunlight to fall upon the gagging and non-opposition clause.
87. The “*No misrepresentations*” clause creates a fiction that SPR has not made any representations about incentives or other inducements to agree to the gagging and non-opposition clauses in order to induce the entering of the Option Agreement.

The role played by Incentive Payments.

88. SPR uses Incentive Payments to induce landowners to enter gagging and non-opposition obligations.

89. In two documents entitled “Funding Statement” dated 7 June 2021 (on each EA project) SPR recognises the existence of “*Incentive Payments*”. These documents were authored by Shepherd & Wedderburn.²⁰

90. They set out details of the payments made and anticipated to be made to landowners and they record the payments made in relation to *each* of the applications which adds up to £16.4m. It would appear that the cumulative sums paid out and anticipated to be paid out, as of June 2021, was therefore c. £32.8m.

91. On page twelve SPR sets out the general assumptions it has used. The third is of significance (in bold below):

i. **“General Assumptions**

- The estimate has been prepared on the basis of Current Market Value which would be payable in the event of the Applicant acquiring land and rights under the terms of the DCO rather than by voluntary agreement. Associated disturbance is included. The costs associated with surveys which will be undertaken on a voluntary basis and compensated prior to the DCO being confirmed are excluded from this assessment.
- The estimate relies on assessments of buildings from vantage points and internal property inspections have not been undertaken. In addition, further research has been completed via the internet, media, aerial and ground photography and from investigations into comparable local valuation evidence.
- ***No allowance has been made for any Incentive Payments which would otherwise be payable for voluntary agreements (subject to meeting various criteria).”***

92. The Incentive Payments are subject to “*various criteria*” which are nowhere set out. It is clear from the Heads of Terms that they are or at least include payments to induce landowners and others to enter into agreements containing gagging and non-opposition clauses. SPR decided

²⁰ Funding Statement EA1N, Annex 3 Property Cost Estimate Statement from Dalcour Maclaren, 7 June 2021
[Link](#) Funding Statement EA2, Annex 3 Property Cost Estimate Statement from Dalcour Maclaren, 7 June 2021
[Link](#)

not to disclose these criteria in any response submitted to the Inspectors even though it was obvious that this information was important and relevant to the issue being raised before the Inspectors.

93. SPR says in the document that they are not accounted for as part of the statutory compensation rules. The amounts paid and the criteria for grant are concealed and opaque.
94. Incentive Payments are integral to securing agreement of landowners to the gagging and non-opposition clauses. The facts relating to Dr Gimson are illustrative. Dr Gimson is clear that Incentive Payments (exceeding £50,000) were offered to him for his silence and to enable SPR to control what evidence he gave to the investigation.
95. By exploiting the compulsory purchase regime and by the calculated use of its deep pockets SPR deprived the Authority of relevant evidence and simultaneously weakened the opposition who comprise community interest groups who are strapped for cash and supporters and who have to fund any legal representatives and experts from their own pockets.

D. The law

96. In earlier submissions we identified various parts of the Code which the SRA might consider to be relevant:
- (i) Paragraph 1.1: “You do not abuse your position by taking unfair advantage of clients or others”.
 - (ii) Paragraph 1.4: “You do not mislead or attempt to mislead ... the court or others, either by your own acts or omissions or allowing or being complicit in the acts or omissions of others (including your client).”
 - (iii) Paragraph 3.11: “You do not attempt to prevent anyone from providing information to the SRA or any other body exercising regulatory, supervisory, investigatory or prosecutory functions in the public interest.”
97. We have already provided brief submissions as to how and why these provisions of the Code have been breached. We would add the following observations.
98. The task for the SRA is to (i) find the relevant facts; (ii) determine what role solicitors played in those facts; and (iii) determine whether there has been a violation of the Code.

99. As to the relevant facts we have, above, set out factual matters that we consider will be of assistance to the SRA. We will provide any additional information or evidence that the SRA considers might be of assistance.

100. As to the role of the solicitors it is, we submit, clear that SPR's inhouse and its external solicitors (Shepherd & Wedderburn including its lead Solicitor Mr Colin Innes), at the very least:

- Drafted agreements and documents which were used to implement SPR's strategy of undermining a planning inquiry governed by public law and statute.
- Assisted a client to implement a strategy which was designed at all times to be kept strictly secret from the Inspectors, affected parties with rights to participate in the Inquiry, the Secretary of State and, ultimately, the courts.
- Made a legal application to the Inspectors to exclude evidence relating to this issue from the Inquiry record upon the basis that affected parties who were complaining about SPR were formally "*vexatious*" when at the time the application was made, it will have been evident that this was misleading since those legal representatives were aware that their clients did indeed use such tactics to neutralise potential opponents.
- Made a submission to the Inspectors that they would provide full disclosure of relevant material – the "*full facts*" - knowing that they would not be disclosing the relevant evidence, which profoundly undermined their case.
- Systematically advanced a legal strategy during the Inquiry of refusing to disclose any relevant documents which went to the heart of the complaint against SPR and persisted in this even after the Decision of the Inspectors which expressed real concerns about the use of agreements to suppress evidence and identified this as a serious public interest issue and in which the Inspectors sought the relevant documentation. This was a serious act of hindrance and non-cooperation with a public body exercising a statutory function.

- Generally adopted a legal strategy characterised by an absence of openness and candour.

101. By way of illustration, in one legal submission²¹ SPR argued that there was no objectionable conduct on SPR's part because the Heads of Terms were not legally binding. The lawyers argued that the Heads of Terms contained a statement that they were not legally binding. When they made this statement, they knew it was not true and they did not make good their argument by disclosing to the Inspectors the Heads of Terms since had they done this the falsity of their representations would have been made clear.

102. In the event SEAS managed to place before the Inspectors copies of the actual Heads of Terms which SPR used, and no such language was used. There was one exception to this. SEAS identified one agreement where the statement was used. However, the actual language said only that it did not bind SPR; it did not say that it was not binding on the landowner and the clear inference was that it did bind the landowner. Had the SPR legal team disclosed the Heads of Terms as they had stated they would do the lawyers could not in good faith have advanced such a misleading argument.

103. The facts set out are indicative of a serious failure to respect professional duties owed to public bodies charged with statutory duties to act objectively, fairly and transparently and upon the basis of full evidence. This was not commercial litigation. This was a public inquiry involving major issues of energy policy and serious issues about the ethical conduct of developers. The case demanded high standards from lawyers representing all parties and the lawyers should have ensured that their case to the Inspectors was characterised by transparency and openness.

104. Solicitors owe professional duties to their clients and are charged with advancing the strongest case that they can. But they also owe strong duties to public bodies, as the Code makes clear.

105. The Code is based upon the assumption that solicitors will not mislead decision makers either by commission or omission. In this case the solicitors engaged in misleading representations (commissions) to the Inspectors and a determined failure to provide relevant evidence and

²¹ The Applicants' Response to SEAS Complaint, SPR, 15 April 2021 [Link](#) (paragraph 7)

information (omissions) that they knew the Inspectors needed to see in order to determine an important public interest issue.

106. The wider legal context is also relevant. The solicitors were planning specialists and must be taken to be aware of the governing principles of public law relating to procedural fairness. In orthodox public law a paradigm example of an unfair procedure is one where the decision maker fails to ensure that all affected persons have a fair and unfettered right to make submissions. A fundamental component of the duty to ensure procedural fairness is that the decision maker must ensure that all relevant persons have a right to be heard and are not silenced. The duty lies on the Inspectors to take steps to inform themselves of the relevant facts (eg Wokingham BC v SSCLG [2017] EWHC 1863).
107. The normal principles of procedural fairness apply to planning decisions just as they do to all decisions taken by public bodies. In Hopkins Developments Ltd v Secretary of State for Communities and Local Government [2014] EWCA Civ 470, the duty of an Inspector was to conduct proceedings so that each party had a reasonable opportunity to submit evidence and make submissions on the material issues, whether identified at the outset or emerging during the course of the inquiry.
108. The strategy of the SPR legal team was intended to, and did, harm the ability of the Inspectors to perform their public duties and did prevent affected persons from giving evidence which, as the Inspectors, recognised in their Decision, were statutory and human rights conferred upon these affected persons. Put bluntly, the solicitors assisted their client in an assault upon the fairness of a public inquiry.

Conclusion

109. The case concerns an issue of substantial public importance focusing upon the duties of solicitors towards public bodies and their obligations of transparency and candour.
110. In this case the solicitors involved have permitted their duty to their client to obscure their wider duties under the Code to act in a fair and transparent way towards public bodies performing statutory duties. The effect of this conduct has been to distort a major planning inquiry.
111. This failure is all the more serious because the solicitors knew that the Inspectors viewed the issue at stake as a serious matter raising important public interest concerns.



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17 June 2021

Attn: Assessment & Early Resolution Team

Solicitors **Regulation** Authority
The Cube, 199 Wharfside Street, Birmingham B1 1RN
0370 606 2555
[REDACTED]

Dear Assessment & Early Resolution Team

Thank you for your response dated 19 February 2021

Introduction

1. We apologise for not getting back to you earlier.
2. We of course understand that the SRA does not regulate ScottishPower Renewables (SPR). We can clarify that it is only those who act as legal advisers and representatives for SPR against whom we are complaining. In this case the solicitors are Shepherd & Wedderburn and any in-house solicitors who are relevant to the issue.
3. The central point of the complaint can be described very concisely: it concerns whether it is a breach of the SRA Code for solicitors to draft, promote and enforce provisions in agreements and Memorandum of Understanding that are designed, expressly to undermine a public planning inquiry.
4. Since we last communicated a great deal of additional evidence has come to light. It is set out in documents that we attach with this letter. The issues and the evidence that we rely upon speak for themselves.
5. We attach the central documents that we have submitted to the Examining Authority and to the Secretary of State which set out the relevant facts. These include
(i) Submission of SEAS dated 14 February 2021 (Attachment (i) SEAS Campaign formal complaint to PINS 20210214-2.pdf (138K)) and associated Redacted Options Agreement (Attachment (iA) Option Agreement - REDACTED.pdf);



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(ii) further submission of SEAS dated 22 February 2021 (Attachment (ii) *ISH9 1A - Additional submission Deadline 22.02.21 5pm.docx*);

(iii) response of SPR dated 4 March 2021 (Attachment (iii) *Applicants_Response_04032021.pdf*);

(iv) SEAS letter to the Secretary of State for Business, Energy and Industrial Strategy The Rt Hon Kwasi Kwarteng, MP, on 29th March 2021 (Attachment (iv) *SEAS - letter to SOS Kwasi Kwarteng - 29.3.pdf*)

(v) further submission of SEAS dated 15 April 2021 (Attachment (v) *SEAS Response to the submission of SPR at Deadline 8 re NDAs 20210415.pdf*);

(vi) further submission of SEAS dated 15 April 2021 (Attachment (vi) *ISH15 Item 1A NDA - SEAS Oral & Written submission - DEADLINE 8.pdf*);

(vii) further response of SPR dated 6 May 2021 (Attachment (vii) *Applicants' Comments on SEAS Complaint_060521.pdf*)

6. The facts demonstrate that SPR's legal advisers have put in place a system and network of agreements and arrangements with landowners who are most directly affected by the possible development which gag them and compel them not to participate in the planning inquiry. If they do however participate by, for instance, submitting evidence contrary to SPR then under these arrangements they are compelled formally to withdraw that evidence so that the Inspectors cannot use it against the lawyer's client, SPR. Our submissions set out the analysis as a matter of public law.

7. The issue for the SRA is different and is, in the context of a public inquiry it is a breach of the SRA Code for solicitors actively to use as part of a legal strategy designed to obtain planning consent such clauses and devices.

8. It is our submission that it is a clear and serious breach of the Code for solicitors to deploy as part of their legal strategy such tactics and devices.

The complaint in summary

9. Our complaint concerns the propriety of solicitors drafting contracts such as these for clients to use in relation to public investigations, such as planning inquiries. It is our submission that solicitors should not be assisting clients to undermine a public inquiry, intended to be conducted in the public interest, in this manner. We consider that it is the professional duty of a solicitor to further the impartiality and objectivity of a



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public inquiry, and this is a duty that is entirely consistent with acting in the best interest of a client.

10. Our complaint also concerns the conduct of solicitors in the course of making representations to planning inquiries. The conduct of the hearings by those advising SPR is, we suggest, a matter of serious concern calling for investigation. Included amongst the issues which we invite the SRA to investigate are the following:

- (i) The failure of legal advisers to make available in a fair and open way documents evidencing the relevant gagging and non-opposition clauses so that the Inspectors can form their own views and conclusions on the impact that they have upon the fairness of the proceedings.
- (ii) The conduct of solicitors in criticising opposing persons during public oral hearings as vexatious, inaccurate and as misleading, when it was suggested that SPR had entered into such agreements. This criticism was made in circumstances, when at the time that these criticisms were made, it is proper to infer from the evidence that the legal advisers knew full well that the allegations were true.
- (iii) The making of submissions to the Inspectors that the silence of landowners and their non-attendance at hearings was a telling and significant point in favour of SPR and supported its applications because silence indicated support and acquiescence when at the time that the submission was being made the legal advisers knew that the true reason why landowners had not opposed the applications and had not appeared to give evidence was because they were prohibited from so doing under arrangements agreed with SPR.

The SRA Code

11. We suggest that, at the least, the following provisions of the Code are relevant and have been breached:

- (i) Paragraph 1.1 “*You do not abuse your position by taking unfair advantage of clients or others*”.
- (ii) Paragraph 1.4 “*You do not mislead or attempt to mislead ... the court or others, either by your own acts or omissions or allowing or being complicit in the acts or omissions of others (including your client)*”; and
- (iii) Paragraph 3.11: “*You do not attempt to prevent anyone from providing information to the SRA or any other body exercising regulatory, supervisory, investigatory or prosecutory functions in the public interest.*”

12. The Conduct complained of by SPRs legal advisers violates the Code in the following ways:



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*a threat hanging over
coastal suffolk*

(i) Paragraph 3.11: In drafting, promoting, operating and defending before the Authority the agreements and arrangements which gag landowners and prohibit them from giving evidence during the public inquiry and which require them to withdraw evidence already given, the solicitors conduct is expressly designed to "... *prevent [all affected landowners] from providing information to a body exercising regulatory, supervisory, investigatory functions [the Examining Authority] in the public interest.*". It is beyond dispute that the Inspectors are public bodies required to act in the public interest.

(ii) Paragraph 1.4: By representing to the Inspectors that landowners supported the case of SPR and that this was the reason that those landowners had not attended to give evidence the legal adviser acted in a way which could "*mislead or attempt to mislead others*" ie the Inspectors. It is a reasonable inference to draw that when those statements were advanced to the Inquiry as part of legal argument by the lawyers for SPR it was known full well that the real reason that landowners had neither opposed the applications of SPR for development consent nor had turned up to give evidence, was because they had been required not to do so by arrangement with SPR. SPRs solicitors thus actively used the gagging and non-participation arrangements to enable them to advance submissions about the weight of the evidence and the strength of their case which they must have known was inaccurate.

(iii) Paragraph 1.1: This prohibits solicitors from abusing their position as a solicitor by taking unfair advantage of clients or others. In this case the abuse has been of others ie: landowners, the Inspectors and those opposing SPR. SPRs lawyers have been able to compel landowners to enter into gagging and non-opposition arrangements because SPR has the ability to use compulsory purchase powers under statute. Those powers were never contemplated by Parliament as being capable of being used to undermine and subvert planning inquiries. However, in this case SPRs advisers have used contractual documents and other arrangements

(iv) to gag potential opponents and deprive the Authority of directly relevant evidence and unfairly tilt the entire planning process in its favour.

Conclusion

13. We would suggest that this issue arising is one of real public significance. At one point SPR suggested that these were normal commercial practices and approved by RICS. As is explained in the submissions made by SEAS nothing could be further from the truth.

14. Given SPR's stance it is reasonable to assume that they have used these clauses, with the support and assistance of their legal advisors, in *other* planning and public inquiries.



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15. If that is so, and solicitors are drafting and promoting such contracts and arrangements as a matter of course, then this is a matter of grave public importance. We would respectfully suggest that clarification by the SRA of the position of solicitors under the Code is a matter of some urgency.

16. We stand ready to provide additional information if we are able.

Yours

Suffolk Energy Action Solutions (SEAS)

Submission to the Secretary of State in relation to applications by
ScottishPower Renewables (SPR) for consent on planning applications
East Anglia One North (EA1N) and East Anglia Two (EA2)

7 October 2021

A. Introduction and context

Context

1. The Examining Authority (the Inspectors) are due to report to the Secretary of State in or about early October in relation to the applications by ScottishPower Renewables (SPR) for consent on applications East Anglia One North (EA1N) and East Anglia Two (EA2). The Secretary of State has three months thereafter in which to make a decision.
2. This submission addresses an issue of law and policy that the Secretary of State must address in light of the recommendations of the Inspectors. This submission is supplementary to those already made on the issue. It brings the analysis up to date.
3. The full documentation, which includes that submitted to the Inspectors by all affected parties (including therefore SPR), is linked.¹
4. The applications for consent concern offshore wind turbines the power from which is, under the applications, due to be landed at the fragile and crumbling Sizewell cliffs and then run in a cable for about 9km through the Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the Sandlings SPA (Special Protected Area) and the villages of Thorpeness and Aldringham to end at substations, two and a half times

¹ Letter of Complaint to the Inspectors, SEAS, 14 February 2021 [Link](#)

An Additional Submission following Issue Specific Hearing 9, SEAS, 22 February 2021 [Link](#)

Main SEAS Submission, Negotiations with Affected Persons, SEAS Deadline 8, 25 March 2021 [Link](#)

SEAS Response to the submission of SPR at Deadline 8 on SEAS's complaint about gagging and non-opposition clauses, SEAS Deadline 10, May 2021 [Link](#)

SEAS's Response to the Applicants' Comments [REP10-031] on SEAS's complaint about gagging and non-participation and opposition clauses, SEAS Deadline 13, 5 July 2021 [Link](#)

The Applicants Response to SEAS Complaint, SPR, 4 March 2021 [Link](#)

The Applicants Written Summary of Oral Case, SPR, 19 March 2021 [Link](#)

The Applicants Response to SEAS Complaint, SPR, 15 April 2021 [Link](#)

The Applicants comments on SEAS NDA Complaint, SPR, 6 May 2021 [Link](#)

the size of Wembley Stadium, located in the heart of the ancient village of Friston in rural Suffolk.

5. The site cuts across medieval pilgrim paths which link Friston to adjacent villages and churches. The area is one of outstanding natural beauty. It is close to the famous Benjamin Britten Concert Hall at Snape and to the coastal resort of Aldeburgh.
6. There is no precedent for the placing of structures this vast and overwhelming in a residential setting surrounded by ancient farmland. The substation is planned to be one of the largest ever installed in Europe. The development will decimate the village of Friston and its local environment.

Widespread opposition from across the region to the applications

7. Not surprisingly the applications have engendered fierce opposition from a multitude of political, community and commercial groups from along the entire East Suffolk coastal region.
8. There is considerable enthusiasm for green energy projects. However, there is opposition to the implementation of an energy policy that causes destruction of the countryside in a wholly unnecessary manner.
9. There are alternative ways of landing wind turbine energy and connecting it to the grid which do not desolate the countryside and coastal communities.

SPR's strategy of neutralising opposition

10. Knowing that its applications would be controversial and opposed, SPR set out to neutralise opposition by those most directly affected. This included all those whose land SPR needed to acquire or gain access to. Given the scale of the development this amounts to a large number of landowners, and it includes certain local authorities.
11. SPR implemented a strategy of exploiting the enormous leverage that the compulsory purchase regime confers upon it. Under that regime SPR is entitled to purchase and obtain access to land that it needs to implement any consent given by the Secretary of State. Landowners have no real freedom of contact. They are not free to refuse to deal with SPR. The whip hand lies with SPR.
12. In the ordinary course, the use of compulsory purchase powers is conditional upon, and therefore subsequent to, the grant of development consent. It arises when the planning process has completed.

13. However, a practice has emerged of applicants for development seeking to enter agreements with landowners prior to consent. Developers are willing to pay a premium for these pre-consent agreements because it accelerates the development if consent is subsequently given. There is no objection in principle to developers seeking pre-agreement in this manner.
14. However, there is objection to developers using this statutory power as a device secretly to subvert and undermine the planning process.
15. The decision to grant or refuse consent is dictated by planning legislation and is governed by ordinary public law principles. These demand that planning decisions are objective, fair and transparent. Those affected by the proposed development have a statutory and common law right to give evidence to the Inspectors.
16. When Parliament enacted the compulsory purchase regime it was not contemplated for a moment that the system could be distorted by developers to undermine the planning process. Indeed at that point in time compulsory purchase processes were contemplated as occurring after the planning consent was given. The right to compulsory purchase a third person's land is conditional upon consent.
17. Parliament therefore assumed that the consent and approval process would be conducted in accordance with normal public law principles of fairness including the right of all affected persons to give unfettered submissions and evidence. Parliament operated upon the premise that a person might enter a compulsory purchase agreement even though that person had vigorously opposed the granting of consent in the earlier proceedings. Put another way – concluding a compulsory purchase agreement and opposing the grant of consent upon which the agreement is conditional are not mutually exclusive.
18. SPR set out, deliberately, to subvert the entire planning process. It did this by exploiting the existence of compulsory purchase powers to prohibit relevant landowners from *participating* in the planning process. Full details are set out below. This meant that directly affected parties could not submit written representations to the Inspectors, attend oral hearings and give evidence, or support and fund opposition groups. The SPR strategy extends beyond the proceedings before the Inspectors and covers subsequent submissions to the Secretary State and any resultant court proceedings.
19. SPR's strategy is a direct and unacceptable assault on a process governed by public law.

20. SPR's strategy of neutralising opponents was reinforced by the imposition of confidentiality and gagging bans on landowners. The entire process was always intended to be covert and secret. Indeed under SPR's terms, affected parties would have to lie and dissemble if asked about the reasons why they had not given evidence. It was never intended that the Inspectors, the Secretary of State, or even the courts should ever come to learn about this strategy.
21. All of this is incontrovertible. It flows out of documents drafted by lawyers for SPR and used in the course of these proceedings. It is set out in black and white terms.
22. It was by chance that over the course of the inquiry, these documents came to the attention of groups opposing the applications.
23. SPR's strategy was rigorously implemented by SPR, its land agents and its lawyers.
24. A complaint has been made to the Solicitors Regulation Authority (SRA) about the conduct of SPR's lawyers in devising, implementing and advancing this strategy in the course of the Inquiry. The SRA has indicated that the complaint meets the initial threshold for investigation and is now engaged in investigating.²

The failure of the Inspectors to grapple with the issue

25. As explained below, despite all of this being brought to the attention of the Inspectors, and despite the Inspectors issuing a formal decision expressing deep concern about attempts by SPR to undermine the ability of affected persons to give evidence, and despite the Inspectors saying that following full submissions by the parties they would take a definitive decision on the matter, and despite SPR then failing to make good on promises to provide the Inspectors with "full information", the Inspectors did nothing.
26. The Inspectors did not take any steps whatsoever to investigate or compel SPR to disclose relevant evidence and information. They took no steps at

² The following have been sent as a pdf in an email on 7 October 2021 with this Submission:

i) Supplementary Submission to the SRA concerning the involvement of solicitors in applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia One North and East Anglia Two, SEAS, 9 September 2021

ii) Submission to the SRA concerning the involvement of solicitors in applications by ScottishPower Renewables (SPR) for consent on planning applications East Anglia One North and East Anglia Two, SEAS, 17 June 2021

all to remedy the situation. They persisted in this passivity even after they were given a three month extension of the inquiry. Through this inaction the Inspectors have permitted SPR to proceed through the entire inquiry with the opposition having its arms tied behind its back.

27. The Inspectors have not explained why they have failed to take a decision on the complaint. The reason for this may well be that when this issue came to light the Inspectors were overwhelmed and could not cope, an extraordinary fact that they conveyed secretly to the Secretary of State but kept hidden from the parties. It only became public knowledge when SEAS sought information about the application made by the Inspectors to the Secretary of State in a FOIA request³. But for this, the state of disarray that the Inspectors found themselves in would have remained a concealed fact.
28. However, even when the extension was granted, the Inspectors failed to address this issue, despite now having an extra three months in which to investigate and despite SEAS now having been able to put chapter and verse before the Inspectors as set out in the Main SEAS Submission.⁴
29. The net effect of this is that the inquiry - from start to finish - proceeded with SPR successfully neutralising a class and category of affected person who, in normal circumstances, would be amongst the most directly and adversely affected of all persons and who could have been expected: to oppose the applications, to submit written and oral and expert evidence on issues directly relevant to the inquiry, and to support opposition groups by providing administrative and financial support etc.
30. The failure of the Inspectors to address this issue enabled SPR to tender evidence which has not been subjected to the same level of adverse scrutiny that it should have been subjected to and, at the same time, it has weakened the opposition to SPR by denying them financial and other support and resources.
31. SPR slanted and distorted the inquiry in its favour and it was able to persist with this strategy because the Inspectors failed to grapple with the issue having said that they would.
32. In law, it follows that any recommendation of the Inspectors which supports the applications is one that is riven through by unlawful procedural unfairness.

³ Formal request to extend the Examinations for EA1N and EA2, Planning Inspectorate, 9 February 2021 [Link](#)

⁴ Main SEAS Submission, Negotiations with Affected Persons, SEAS Deadline 8, 25 March 2021 [Link](#)

33. This has a further consequence. It is therefore not open in law for the Secretary of State to accept any such recommendation. Under well-established principles of public law any decision of the Secretary of State in favour of SPR will be set aside by the courts.

SPR's conduct after close of the Inquiry

34. SEAS must put down a marker.

35. After the end of the Inquiry SPR has continued to undertake extensive work on the proposed sites. It has carried out investigative work that it should have carried out before the Inquiry ended. This has included work on the proposed substation site, cable corridor and landfall site.

36. The assumption is that SPR will place this evidence before the Secretary of State in the hope that it will be accepted without challenge or test.

37. If SPR does this, it will serve only to compound the deep procedural unfairness that has already pervaded this Inquiry and process whereby SPR has sought to neutralise opposition to its evidence and applications. SEAS therefore reserves all rights in relation to any such attempt by SPR to introduce new evidence following the recommendations of the Inspectors.

B. The facts

The first complaint made to the Inspectors

38. It was chance that brought SPR's strategy to light. It emerged because at an early point during the proceedings a landowner whose land SPR wished to obtain access to, objected to SPR's attempt to gag him and prevent him from giving evidence hostile to SPR during the inquiry. Dr Alexander Gimson is a trustee of an important local charity, the Wardens Trust, which is situated on top of the cliffs at Sizewell and is literally metres from where SPR intended to land the cable from the turbines. The Wardens Trust provides respite care and other services to those with physical and mental disabilities. It is a collection of buildings that do not however have an independent water supply. It relies upon being able to access water from the aquifers that run under the ground here. The unequivocal evidence of Dr Gimson is that if the cables are landed as planned it will radically damage the underground aquifers and that in any event the development will represent an existential threat to the entire charity, the defining feature of which is a peaceful haven for those who visit. SPR needed access to his land in order to conduct underground

tests. They sent him a copy of their standard form agreement. This contained the full array of clauses prohibiting him from giving evidence to the Inquiry and gagging him. They offered over £50,000 to induce him to agree to these clauses. He refused to agree. He then made public the draft agreements. He drew the SPR documentation to the attention of the opposition groups and to the Inspectors.

39. This led Suffolk Energy Action Solutions (SEAS) to make a complaint on 14th February 2021, based upon this relatively limited evidence, in which it was alleged that SPR was using agreements to require landowners to refrain from assisting the Inspectors or objecting to the applications.⁵

SPR’s application to have evidence of its alleged misconduct removed from the record upon the basis that it was “vexatious” and misleading

40. In light of the SEAS complaint SPR emphatically denied that it had any such policy.⁶ It went public with its denial and procured an article in the national press (The Telegraph) in which it repeated the denials.⁷

25. Before the Inspectors, SPR's legal team personally attacked those who said that such a strategy existed, including Dr Gimson.

26. The SPR legal team (Shepherd & Wedderburn) then made a formal application to have the evidence of the alleged misconduct of SPR removed from the record upon the basis that, under the procedural governing rules, the evidence was “vexatious” and misleading. If the application succeeded the effect would be that the Inspectors would in effect expunge the evidence from the record.⁸

27. SPR’s lawyers, in their oral submissions, stated to the Inspectors that when they had the “full facts”, they would reject the complaint. The legal team represented that they would be providing the “full facts” i.e. full and comprehensive evidence to refute the complaint of misconduct by SPR.⁹

⁵ Letter of Complaint to the Inspectors, SEAS, 14 February 2021 [Link](#)

⁶ As recorded at page A2 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

⁷ On 28th February 2021, journalist Rachel Millard wrote an article in the Telegraph about the SEAS complaint. A spokesperson for SPR denied both that SPR had entered into any agreements of the sort complained about or that it would ever seek to undermine a planning process. ■■■■

⁸ The Applicants’ Response to SEAS Complaint, SPR, 4 March 2021 [Link](#)

⁹ At Issue Specific Hearing 9 Session One on 19 February 2021, SPR indignantly stated that once the Examining Authority had seen the “full facts” and all the “material” it would reach a very different conclusion on SEAS “supposed complaint”. Colin Innes, the solicitor leading for SPR stated: : “All I would say is that again it should be based on full facts of the particular circumstances that have been alleged. And in my submission, once you

28. As became clear when this representation was made, SPR's legal team must have known that the complaints against SPR were justified and that denials on its behalf were false. It is reasonable to infer that when they made this submission, they had no intention of providing the relevant evidence.
29. The Rt Hon Dr Therese Coffey MP and local councillors gave evidence before the Inspectors emphasising the critical importance of ensuring fair and open processes. Dr Coffey has expressed the view to the Secretary of State that in her view the SPR's strategy involved "*sharp*" practice.¹⁰
30. At a hearing on Friday 19th February the solicitor for SPR, Mr Colin Innes, attacked SEAS's complaint (of 14th February) as inaccurate and bordering on vexatious. Speaking on behalf of SEAS, Mr. Fincham, a retired City solicitor, rejected that argument. However, he properly made clear that SEAS would reconsider its position in the light of any submission and evidence which would be made by SPR in response to the SEAS complaint, especially since the SPR legal team had represented that it would provide the "*full facts*". Mr Fincham pointed out that Dr Gimson had given evidence that he was offered a sum in excess of £50,000 to withdraw his evidence.
31. SEAS then set out what evidence it thought SPR should provide: (1) a statement detailing all payments agreed or offered to interested or affected parties, charities, local authorities or other bodies or individuals; and (2) disclosure of all relevant material including concluded agreements, draft agreements or other documents containing or evidencing offers, and emails sent or received by SPR, or those acting for it, relevant to payments agreed or offered.¹¹
32. SPR's lawyers were on notice as to exactly the sort of evidence that they should provide to support their application that those opposing SPR were formally "*vexatious*", within the procedural rules.

The Inspectors decision 22nd February 2021

have read that material, I believe that you will reach a very different conclusion from that which has been submitted to you by SEAS in terms of their supposed complaint." Transcript [Link](#) Recording [Link](#)

¹⁰ Transcript of The Rt Hon Dr Therese Coffey MP's NDA Submission [Link](#)

¹¹ An Additional Submission following Issue Specific Hearing 9, SEAS, 22 February 2021 [Link](#)

41. On 22nd February 2021 the Inspectors issued a decision (the Decision) on the application made by SPR’s lawyers to exclude the complaint by SEAS and others.¹²
42. The Inspectors rejected SPR’s application and held that the complaints would be retained on the record.¹³ The Inspectors rejected the submission that the complaint by SEAS and others was vexatious. They added that SPR would be given a full chance to respond to the complaint.¹⁴
43. In the Decision the Inspectors recorded the facts including that SPR had denied using agreements to gag opponents and prevent participation in the planning inquiry. It also noted that SPR had challenged those who had made allegations against SPR as “*vexatious*”. It recorded the submission of the Rt Hon Dr Therese Coffey and others about the importance of fair and open proceedings.
44. The Inspectors made the following points:
45. First, they recognised that no one should take steps to “*raise any reasonable apprehension in the minds of affected persons that they are to be prevented from enjoying their statutory rights of participation in these Examinations or that their related human rights are not being responded to*”.¹⁵
46. Secondly, they observed that “*Allegations of misconduct should not be made unless they can be clearly substantiated*”.¹⁶
47. Thirdly, they made the following observations about the critical importance of affected persons having a full and fair right to make representations: “*It is not in the public interest that there should be an enduring apprehension on the part of an Affected Person that they might*

¹² The Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹³ As recorded at pages A3 and A5 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁴ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁵ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁶ As recorded at page A3 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

be prevented from participating in these Examinations to raise their outstanding planning merits objections".¹⁷

48. The Inspectors also observed that evidence had come to light that SPR was using contract terms to gag potential objectors and prevent them from participating in the inquiry.
49. The Inspectors stated of the complaints "*They raise a general point of public interest*".
50. Having decided that they would not reject the SEAS complaint and that of others about SPR it also stated that it would not take a "*concluded position*" on the substantive merits of the complaint until SPR had made its submission and submitted relevant evidence (as it had promised to do).¹⁸
51. The Inspectors reminded everyone that they should "*diligently review factual material*" and confine remarks to facts "*which they know to be verifiably true*" and to "*provide evidence where necessary*".
52. The Decision is important since it made clear the Inspectors views and, in particular, that they considered the issue to be of general public importance and that it was incumbent upon the SPR legal team now to diligently review the factual material and provide the relevant documentation.

The response of the SPR legal team

53. Various submissions were subsequently made by SPR and also by affected persons. These included what is now the Main SEAS Submission. This drew together all of the facts and evidence relating to SPR's strategy and set out a detailed legal analysis. It also provided references to the extensive evidence of opposition to SPR on this issue from residents all over the region.¹⁹
54. In the light of this SPR's legal team did not submit any evidence about SPR's agreements, about its negotiations with landowners, about the

¹⁷ As recorded at page A4 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁸ As recorded at page A4 in the Procedural Decision on Negotiations with Affected Persons, Examining Authority, 22 February 2021 [Link](#)

¹⁹ Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)

payments made to affected persons to prevent them from participating and to buy their silence, etc.

55. The SPR team adopted a minimalist strategy lacking any semblance of transparency, and failing to proffer the “*full facts*” that it had informed the Inspectors it would disclose.
56. SRR’s solicitors adopted this stance even though the Inspectors had held that SPR should provide relevant evidence and that this was an issue of real public importance.
57. SPR’s legal responses were confined to short observations which seemed to suggest that the use of such a strategy was just normal commercial practice. The legal tactic was to stonewall.
58. In one extraordinary later legal submission, the lead solicitor acting for SPR, Mr Colin Innes, during a hearing relating to issues concerning compulsory purchase, sought explicitly to rely upon the *absence* of opposition from landowners as evidence that they all supported SPRs applications.²⁰ In making this submission Mr Innes did not remind the Inspectors that SPR had gagged and shackled all of the landowners. It reflects a position taken by SPR and its legal team that they should continue to seek to rely upon the malign effects of their gagging and non-opposition strategy to obtain material forensic advantage during the planning process. Details are set out at paragraph 8 of the SEAS Main Submission dated 25 March 2021²¹

The extension of time for completion of the Inquiry

59. The Secretary of State is already aware of the anger felt by affected persons flowing out of the decision of the Secretary of State to extend the time permitted for the inquiry.²² All rights are reserved in relation to that episode.
60. When the Inspectors made the application for an extension, they did this upon the basis that they were overwhelmed and could not cope. The Inspectors did not intend that their inability to cope would become public knowledge.

²⁰ Details are set out in Compulsory Acquisition Hearing 3, Session 4, 18 March 2021 Transcript [Link](#) (page 7) Recording [Link](#) (17.5 minutes in)

²¹ Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)

²² Objection to Extension of the Examinations, SEAS, April 2021 [Link](#)

61. When the extension was granted, the Inspectors did not however take the opportunity afforded by the extra time to investigate SPR's conduct or take the decision that they had earlier indicated they would take.
62. Their failure to do so led to the procedural unfairness being yet further compounded. At this stage, as affected persons explicitly told the inspectors, those opposing SPR had more or less run out of funds and depleted their resources. SPR of course remained with its unlimited deep pockets. It submitted a raft of new evidence on onshore effects and the ability of those opposing to counter that evidence was severely undermined and compounded by the prolonged suppression of evidence from landowners.
63. The failure of the Inspectors to use the extra time to grapple with this issue has meant that when the proceedings finally came to an end, SPR had been afforded extended opportunities to present its version of events and its evidence and the ability of affected persons to oppose that evidence had been repeatedly and systemically undermined.
64. At one point the Inspectors suggested that they might address this issue in their recommendations. It is not known whether the Inspectors will in fact do this or what their conclusions will be. But addressing the issue in recommendations is far too late. It means that the chance to remedy any procedural unfairness has been irretrievably lost. The only option for the Inspectors, having failed to ensure procedural fairness, is to conclude against SPR and recommend accordingly.

The position in relation to the Sizewell C inquiry

65. Inquiries have established that EDF, the applicant for consent at Sizewell C for the construction of a new nuclear power generating plant, does NOT use comparable or equivalent gagging and non-participating clauses in its dealing with landowners in relation to the ongoing enquiry into Sizewell C. The Sizewell inquiry is comparable in that it concerns a development which will be very close in terms of proximity to the present cable route and substation and involves many of the same affected persons and some of the same types of argument (e.g. about the cumulative impact of multiple energy projects in the region). The use of such tactics as SPR and its legal team deploys are not part of normal planning processes conducted fairly and transparently, in good faith and in the public interest.

C. Details of the SPR strategy

The core facts are incontrovertible

66. The basic facts relied upon are incontrovertible. They flow from documents emanating from SPR. The prohibitions are set out in black and white. There can be no scope for any argument or debate about their existence. The agreements are formal legal documents drafted by SPR's solicitors or are documents drafted by SPR's legal team and submitted to the Inquiry (e.g. in relation to Incentive Payments).

67. SPR's lawyers have prepared a series of formal legal agreements: (i) a Heads of Terms and (ii) an Option Agreement. The basic facts are as follows.

The use of pressure by SPR to obtain agreement

68. The "*full facts*", to use the expression used by SPR's lead solicitor in evidence during the inquiry, have not been easy to unearth. Affected persons have wished to remain anonymous because they fear reprisals from SPR. A number took legal advice and were advised that their agreements prevented them from speaking to SEAS or the Inspectors. They were told that they could not speak to anyone about anything. Nonetheless, a sufficient number of affected persons did come forward and provide evidence including relevant agreements and email exchanges between themselves and SPR and its agents.²³

69. The Heads of Terms are intended to be used until such time as consent is given at which point it folds into the Option Agreement. The Heads of Terms contain two very different components. First, it contains the terms that SPR will agree with the landowner when consent is given. This part of the Heads of Terms is therefore forward looking and conditional upon consent. The second part is that which prohibits landowners from participating in the inquiry and which imposes upon them absolute secrecy. This part of the agreement is not prospective or conditional upon consent, but bites immediately and is designed to help SPR to obtain consent.

70. There is an enforcement mechanism in the agreement which involves the mediation of "*claims*". That can only be read as referring to "*claims*" for breach of contract and, in practice, can only realistically apply to the non-participation and gagging obligations since those are the only parts of the agreement which have immediate effect and are not conditional.

²³ SPR took steps to identify those assisting opposing groups and strenuously remonstrated with such persons: See Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#)

71. For at least 9 months before the Examination commenced SPR set out to use the leverage it held through the compulsory purchase legislation to sign up all landowners whose land SPR might either need to purchase or obtain access to. Its aim was to sign up as many landowners as it could before the planning inquiry commenced.
72. SPR, by itself and through its agents, imposed pressure upon the affected landowners to sign the Heads of Terms. They told landowners that under the Development Consent Order (DCO) statutory process, grant of approval was inevitable given the statutory presumption in favour of development. Further, they emphasised that if landowners did not sign up now SPR would force them to later, once development consent was granted, and SPR would then offer them much worse terms.
73. A number of individuals submitted evidence to the Inspectors evidencing the pressure exerted by SPR. This is recorded in the SEAS Main Submission and in other evidence contained on the Examining Authority website.²⁴ That evidence was to the effect that those who had signed the Heads of Terms felt compelled to do so by virtue of the fact that this was a compulsory purchase procedure and that they had no option, and that this was an DCO process and therefore a forgone conclusion, in SPR's favour. One example, which was put before the Inspectors and was referred to in SEAS's submissions, and which is characteristic of other evidence given to SEAS and to the Inspectors, was in the following terms:

“As for the matter of “negotiating” the SPR Terms of Agreement - what rubbish. We were very forcefully told at a Zoom meeting with our agent, SPR's agent and SPR's representative way back in 2020, that if we did not accept their Agreement, they would employ Compulsory Powers, and we would be entitled to only a minimum amount of compensation - we felt it was intimidation. The SPR comment that “no such agreements had actually been entered into” (The Telegraph) is a blatant lie. I know for definite two people who have told me they are tied up in Non-Disclosure Agreements and are barred from commentating on anything to do with SPR's applications. Regarding their so-called “proven track record of

²⁴ Main SEAS Submission, SEAS written submission for ISH14, Negotiations with Affected Persons Deadline 8, 25 March 2021 [Link](#) National Infrastructure Planning Website, [Link](#)

positive community engagement”, I am still waiting for my first communication from SPR.”²⁵

74. Another affected person who gave evidence to the Inspectors said as follows:

“With regards to the purchase of lands required for the above-mentioned projects you should be aware of the intimidating tactics employed by SPR from the outset. At one of our meetings in our village hall, Friston, during the consultation period, a family living along the proposed cable corridor was brought to tears describing how SPR had been treating them. The home that they had lived in for years was under threat as SPR wanted to purchase some of their land for the cable corridor. SPR told the home owner that if they didn’t agree to sell, that the land would nonetheless be compulsory purchased and the amount that they would subsequently receive would be a lot less than what they were being offered. They didn’t want to sell but in essence were being bullied. It was horrible how SPR was threatening them and at such an early stage in the procedure.

Now we have learned that should you agree to sell your property you have to also agree to a gagging order. I strongly object to such unjustifiable tactics being employed in a public procedure.”

75. The Chair of the Aldeburgh Society gave the following evidence to the Inspectors:

“... We write to express our disquiet about Scottish Power’s alleged use of non-disclosure agreements within these Option Agreements.

These non-disclosure agreements risk undermining the integrity of the statutory application procedure, preventing as they might the expression of honest and genuine opposition to SPR’s application.

The use of financial incentives is particularly worrying as is the requirement that signatories to the Option Agreements withdraw previously expressed objections to SPR’s plans.

²⁵ See paragraph 100 of Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#) (the full evidence from the individual concerned is on the National Infrastructure Planning Website)

The rule of law requires and provides a right of free speech. The DCO process is being undermined by these attempts to curtail that right and the resulting shift in the balance of power in favour of the developers with greater resources further disadvantages the local communities affected by the application.

The Examining Authority has a responsibility to address this very serious issue and we support SEAS in bringing this matter to your attention. We invite you to disregard any enforced changes of position by residents who have signed these Option Agreements and ask you to abide by their original and transparently honest expressions of concern about SPR's plans.”

76. The following quote is from the Main SEAS Submission. It summarised the topics which were the subject matter of the evidence submitted to the Inspectors by affected parties:²⁶

- “- the real anger felt by residents as to the harmful effect on free speech and the integrity of the planning process;
- the pressure imposed by SPR;
- the absence of free negotiation and the use by SPR and its agents of the threat of compulsory powers to secure agreements;
- the impression conveyed that NSIP processes are stacked in favour of applicants and that this is used in negotiations to secure agreements;
- the improper linkage of compulsory purchase powers to the suppression of evidence to the inquiry;
- the impact of the loss of relevant evidence collected in the inquiry;
- the propriety of lawyers advising on the use of such gagging clauses in the context of planning inquiries;
- the fact that in other local planning processes, such as in relation to Sizewell, the applicant is not seeking to impose equivalent gagging and non-opposition clauses;

²⁶See paragraph 102, Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#)

- the harm being done by policies such as that used by SPR to democracy and confidence in public decision making.”

77. All of this evidence was submitted during the inquiry and SPR’s legal team were therefore fully aware of it. Yet, at no time did the lawyers consider that, as the evidence mounted, it was the right and proper thing to do to come clean and lay before the Inspectors the relevant documents so that the truth could be laid bare.

The Heads of Terms

78. SPR uses variants of its Heads of Terms. There are some very slight differences in terminology, but these are not material. These variations were placed before the Inspectors. The basic system is the same throughout. For ease of reference we identify the objectionable clauses used by SPR as A, B and C.

79. Clause A sets out the Incentive Payments to be paid by SPR to the landowner. These payments are made:

“for signing Heads of Terms payable on completion of the Options Agreement”.

80. Clause B prohibits objections from the landowner:

“Planning Matters

The Grantor will not object to the Developer’s application for Development Consent nor any other planning application(s) associated with the Projects.”

81. Clause C imposes the gagging obligation:

“Confidentiality

These Heads of Terms are confidential to the parties named whether or not the matter proceeds to completion save that reference to them having been entered into may be referred to with the Planning Inspectorate”.

82. The Incentive Payment is a payment made only upon entering the Option Agreement demonstrating the linked nature of the two agreements. It may

not be paid if the landowner breaches the agreement and participates in the inquiry or does not observe total secrecy about the terms of the agreement or fails to comply with the terms of the agreement.

83. Clause B prohibits the landowner from objecting. This covers any activity such as: putting in representations against SPR; supporting any campaigning group such as SEAS who will make representations on the landowner's behalf; funding SEAS or any other opposing body or group to make representations on the landowner's behalf.
84. The words "*nor any other planning application(s) associated with the Projects*" expand the prohibition to "*associated*" applications. The word "*associated*" is not defined but by definition extends beyond the applications in issue. It ensures that the prohibition upon opposition is comprehensive. It would include a prohibition on adducing objection in relation to other projects which would be relevant, for instance, to an assessment of cumulative impact.
85. The prohibition covers *every* aspect of the application for which consent is being sought and goes beyond limited objections that might relate to the landowners own parcel of land.
86. Clause C prohibits any reference to the Heads of Terms and prevents them being shown to any third party. This prohibition operates even if the matters do not proceed to completion. Once the Heads of Terms have been entered, they prevent the landowner from admitting that he had been gagged or prohibited from objecting *even if* SPR has no lasting interest in the land in question.
87. The expression in clause C "*save that reference to them having been entered into may be referred to with the Planning Inspectorate*" highlights its objectionable nature. If the Inspectors ask a landowner for details of agreements entered into or whether they have been gagged or prevented from submitting evidence the landowner must either refuse to respond or at best admit only the bare fact that Heads of Terms have been entered into. The landowner must dissemble and be uncooperative.

The Option Agreement

88. For payment to be made the landowner must enter the Option Agreement and become a grantor of rights. The prohibitions now become even tighter. The three clauses of greatest interest are as follows:

“Permissions

The Grantor shall not make a representation regarding the EA1N DCO Application nor the EA2 DCO Application (and shall forthwith withdraw any representation made prior to the date of this Agreement and forthwith provide the Grantee with a copy of its withdrawal) nor any other Permission associated with the EA1N Development or the EA2 Development and shall take reasonable steps (Provided that any assistance is kept confidential) to assist the Grantee to obtain all permissions and consents for the EA1N Works and the EA2 Works on the Option Area (the Grantee paying the reasonable and proper professional fees incurred by the Grantor in connection with the preparation and completion of such permissions and consents).”

“Confidentiality

The terms of this Agreement shall be confidential to the parties both before and after completion of the Deed(s) of Grant and neither party shall make or permit or suffer the making of any announcement or publication of such terms (either in whole or in part) nor any comment or statement relating thereto without the prior consent of the other or unless such disclosure is required by the rules of any recognised Stock Exchange on which shares of that party or any parent company are quoted or pursuant to any duty imposed by law on that party or disclosure is required by the Grantee in connection with or in order to obtain the EA1N DCO or the EA2 DCO or any other planning application associated with the EA1N Development or the EA2 Development or any Permission.”

“No misrepresentation

This Agreement incorporates the entire contract between the parties and the parties acknowledge that they have not entered into this agreement in reliance on any statements or representations made by or on behalf of one party to the other save those written statements contained in the written replies made by the Grantor's solicitors to enquiries raised by the Grantee's solicitors.”

89. As to the Permissions clause. This states that the Grantor shall not “*make a representation regarding the EAIN DCO Application nor the EA2 DCO Application*”. This is a direct contractual obligation prohibiting a grantor from assisting the Inspectors with evidence collection. It has nothing to do with normal planning considerations which might properly be the subject of an option agreement. The Grantor cannot by itself or by using a representative body or association, submit any evidence or make any representation of any sort during the Inquiry.
90. Further, the Grantor “*shall forthwith withdraw any representation made prior to the date of this Agreement*”. This compels any person who has already objected to withdraw that objection. The object is to ensure that any evidence unhelpful to SPR is not taken into account by the Inspectors. By way of example Dr Gimson made a series of detailed written and oral submissions to the Inspectors on a wide range of matters including medical and health related issues. If he had felt compelled to sign the SPR agreements he would then have been forced to withdraw all of his prior evidence and that would have prevented the Inspectors from taking it into account.
91. The Grantor will “*forthwith provide the Grantee with a copy of its withdrawal*”. This is part of SPR’s enforcement mechanism to ensure that SPR can be certain that the Inspectors are deprived of relevant evidence.
92. As to the expression that the Grantor “*shall not make a representation regarding ... any other Permission associated with the EAIN Development or the EA2 Development*”, this prevents the Grantor from objecting to any other part of the application to the cable. (See the Definition of Permission and its linkage to the Cable as defined in the Grant). So, for instance, in the case of Dr Gimson, since the cable is due to be landed very close to his property, he would be prevented from complaining to the Inspectors about the impact upon his own property but he would also be prevented from objecting to other matters of concern to him.
93. As to the expression the Grantor shall “*take reasonable steps to assist the Grantee to obtain all permissions and consents for the EAIN Works and the EA2 Works on the Option Area*”, since permission and consent for the Option Area is contingent upon the application as a whole going ahead this would extend to compelling Grantors to assist SPR generally, even if they profoundly objected to it, i.e. it forces them to give evidence and support contrary to their true position.

94. In relation to the Confidentiality clause and the expression: “*The terms of this Agreement shall be confidential to the parties both before and after completion of the Deed(s) of Grant*”, this is a classic gagging clause; any disclosure of the agreement or its terms is a breach of confidence. The duty to preserve confidence post completion of the Deed of Grant is not limited in time. It would extend to cover any subsequent applications for example for applications to add to the Friston site - the cumulative impact point.
95. As to the expression: “*neither party shall make or permit or suffer the making of any announcement or publication of such terms (either in whole or in part)*”, this speaks for itself: A Grantor under a gagging order cannot use third parties to circumvent the gag. It prohibits not just disclosure of the agreements but also from commenting upon it, for example to SEAS or other opposition groups.
96. As to the expression that neither party shall make or permit to make or suffer to be made “*any comment or statement relating thereto without the prior consent of the other*”, this is part of the SPR enforcement mechanism whereby it controls who can say what and to whom. If a Grantor wished to speak to SEAS or to the Inspectors it must seek and obtain SPR’s prior consent.
97. As to the fact that disclosure is allowed pursuant to any duty “*imposed by law*” on that party, a Grantor would be permitted to give evidence to the Inspectors but only if the Inspectors imposed a legal duty upon that person to do so. There is no right voluntarily to proffer evidence. And because the agreements were strictly secret it was SPR’s intent and object that the Inspectors should never learn about the suppression of evidence and therefore never come to even contemplate using any powers that they might have to compel production of evidence.
98. Disclosure can be made by the Grantee (ie SPR) “*in connection with or in order to obtain the EAIN DCO or the EA2 DCO or any other planning application associated with the EAIN Development or the EA2 Development or any Permission.*” SPR can selectively disclose the terms of the agreement and, importantly, parts of it if it helps its case. But under the agreement it is under no obligation to disclose the whole of the agreement since this would allow sunlight to fall upon the gagging and non-opposition clause.
99. The “*No misrepresentations*” clause creates a fiction that SPR has not made any representations about incentives or other inducements to agree

to the gagging and non-opposition clauses in order to induce the entering of the Option Agreement.

The role played by Incentive Payments

100. SPR uses Incentive Payments to induce landowners to enter gagging and non-opposition obligations.
101. In two documents entitled “Funding Statement” dated 7 June 2021 (on each EA project) SPR recognises the existence of “*Incentive Payments*”. These documents were authored and submitted to the Inspectors by Shepherd & Wedderburn, SPR’s lawyers.²⁷
102. They set out details of the payments made and anticipated to be made to landowners and they record the payments made in relation to *each* of the applications which adds up to £16.4m. It would appear that the cumulative sums paid out and anticipated to be paid out, as of June 2021, was therefore c. £32.8m.
103. On page twelve SPR sets out the general assumptions it has used. The third is of significance (in bold below):

- i. **“General Assumptions**

- The estimate has been prepared on the basis of Current Market Value which would be payable in the event of the Applicant acquiring land and rights under the terms of the DCO rather than by voluntary agreement. Associated disturbance is included. The costs associated with surveys which will be undertaken on a voluntary basis and compensated prior to the DCO being confirmed are excluded from this assessment.
- The estimate relies on assessments of buildings from vantage points, and internal property inspections have not been undertaken. In addition, further research has been completed via the internet, media, aerial and ground photography and from investigations into comparable local valuation evidence.

²⁷ Funding Statement EA1N, Annex 3 Property Cost Estimate Statement from Dalcour Maclaren, 7 June 2021
[Link](#) Funding Statement EA2, Annex 3 Property Cost Estimate Statement from Dalcour Maclaren, 7 June 2021
[Link](#)

- *No allowance has been made for any Incentive Payments which would otherwise be payable for voluntary agreements (subject to meeting various criteria)."*

104. The Incentive Payments are subject to “*various criteria*” which are nowhere set out. It is clear from the Heads of Terms that they are or at least include payments to induce landowners and others to enter into agreements containing gagging and non-opposition clauses. SPR decided not to disclose these criteria in any response submitted to the Inspectors even though it was obvious that this information was important and relevant to the issue being raised before the Inspectors.

105. SPR says in the document that they are not accounted for as part of the statutory compensation rules. The amounts paid and the criteria for grant are concealed and opaque.

106. Incentive Payments are integral to securing agreement of landowners to the gagging and non-opposition clauses. The facts relating to Dr Gimson are illustrative. Dr Gimson is clear that Incentive Payments (exceeding £50,000) were offered to him for his silence and to enable SPR to control what evidence he gave to the investigation.

107. By exploiting the compulsory purchase regime and by the calculated use of its deep pockets, SPR deprived the Inspectors of relevant evidence and simultaneously weakened the opposition who comprise community interest groups who are strapped for cash and supporters and who have to fund any legal representatives and experts from their own pockets.

108. SPR has never challenged or sought to refute any of the above evidence or analysis. To do this it would have to disclose key documents and this is something that SPR’s lawyers have never countenanced.

D. The law

A detailed analysis is set out in paragraphs [81] – [96] of the Main SEAS Submission. Please refer for details.²⁸

109. The relevant principles have been set out in innumerable decisions of the House of Lords, Supreme Court, Court of Appeal and High Court and have been settled for a very long time. There is no room for arguments about the scope of these rules.

²⁸ Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#)

110. There are two main sets of legal implications.
111. First, there are the rules relating to procedural fairness. These impose a duty on decision makers to guarantee a fair, objective and transparent procedure. This includes, as a paradigm example, the duty of the decision maker to obtain full and comprehensive evidence and to ensure that all affected persons have a fair opportunity to submit evidence.
112. Secondly, there are the implications of the rules on procedural fairness on the weight and value to be attached to (a) SPR's evidence, and (b) the evidence of those opposing the application.

The test is objective: procedural unfairness can arise even if the decision maker is not at fault

113. The test for procedural fairness is objective. It arises even if the decision maker is not at fault: see e.g. R v CICB [1999] 2 AC 330 page 345. A decision maker cannot act in a way which approves of a process which is procedurally unfair in law. Whatever view is taken of the conduct of SPR the failure of the Inspectors to grapple with the issue and ensure a fair hearing lies squarely with the Inspectors and it is no answer to say that it was SPR that set out, covertly, to undermine the planning process.
114. A paradigm example of an unfair procedure is one where the decision maker fails to ensure that all affected persons have a fair and unfettered right to make submissions. A fundamental component of the duty to ensure procedural fairness is that the decision maker must ensure that all relevant persons have a right to be heard and are not silenced. The duty lies on the Inspectors to take steps to inform themselves of the relevant facts (eg Wokingham BC v SSCLG [2017] EWHC 1863).
115. However, in this case: (i) evidence that SPR had a systematic strategy of neutralising potential opponents was brought to the attention of the Inspectors at a relatively early stage; (ii) in a formal decision they acknowledged the public and legal importance of the issue and stated their intention to address the issue following receipt of submissions and relevant evidence, in particular from SPR; (iii) the Inspectors were furnished with very full evidence and analysis by SEAS which has never been refuted by SPR; (iv) the Inspectors nonetheless failed to investigate or address the issue; (v) they persisted in this failure even after they were granted an extension by the Secretary of State.
116. The law, which is long established in this area, establishes that when a procedure is unfair the resultant decision will be set aside by the courts.

117. Any recommendation in favour of SPR will therefore have been tainted by procedural unfairness. It cannot be accepted by the Secretary of State

Duty to guarantee a fair, transparent and objective procedure.

118. The normal principles of procedural fairness apply to planning decisions just as they do to all decisions taken by public bodies. In Hopkins Developments Ltd v Secretary of State for Communities and Local Government [2014] EWCA Civ 470 the Court of Appeal held that the requirements of fairness as they applied in a case were “*acutely fact sensitive*” [para 93]. The duty of an Inspector was to conduct proceedings so that each party had a reasonable opportunity to submit evidence and make submissions on the material issues, whether identified at the outset or emerging during the course of the inquiry.

119. In this case in its Decision the Inspectors acknowledged the correctness of these principles (see above). This makes their failure to act the more surprising.

Procedural unfairness does not involve proof of prejudice

120. Procedural unfairness does NOT depend on prejudice being proven. This has been established for nearly 80 years. In GMC v Spackman [1943] AC 627 pages 644, 645 the House of Lords held that if principles of natural justice are violated it is “*immaterial whether the same decision would have been arrived at in the absence of the departure for the essential principles of justice*”. This is because procedural unfairness in a public process “*strikes at the roots of justice*”: R v Leicester City Justices [1991] 2 QB 260 at page 290.

121. However, in this case SEAS and others have put in extensive evidence of the substantial prejudice that SPR’s strategy exerted upon the process of evidence collection. The facts of Dr Gimson and the Wardens Trust Charity are dramatic and illustrative of the sort of evidence that SPR set out to suppress. The case of Dr Gimson is set out fully in the Main SEAS Submission.²⁹ Standing back SPR would not have engaged in such a covert strategy which involved the making of substantial secret payments, unless it thought that it would have a material impact upon the outcome of the planning process.

If procedural unfairness exists a resultant decision will be set aside

²⁹ See paragraphs 82 – 99 and to the witness statement of Dr Gimson at page 28. Main SEAS Submission, written submission for ISH14, Negotiations with Affected Persons Deadline 8, SEAS, 25 March 2021 [Link](#)

122. It is very long established that if procedural unfairness is established then any resultant decision will be set aside. If there is procedural unfairness which prejudices a party to a planning inquiry that is grounds for quashing the Inspectors decision (Hopkins para [62]). In this case there has been procedural unfairness.

Procedural defects cannot be cured

123. Once procedural unfairness exists it cannot be cured. The courts have rejected the argument that because the unfairness occurred at an earlier stage in a process it can be cured at a later stage of the proceedings: R(Citizens UK) v SSHD [2018] EWCA Civ at paragraph 94. This has been applied on a number of occasions in the planning context eg in relation to cumulative impact: See e.g. R(Brown) v Carlisle City Council [2010] EWCA Civ 523 at paragraph 40 where it was held that a failure to consider cumulative impact could not be cured by an assurance that it would be considered at a later stage. This was followed recently in the Vanguard judicial review.

124. This inquiry involves a great deal of very complex evidence concerning onshore effects. The failure of the Inspectors to address and fully remedy the issue at an early stage means that there is no possibility in law of the situation being retrieved now. There is no way in which the failure of the Inspectors can be remedied after the event. Any decision by the Secretary of State which approves consent will be based upon a deep, enduring and unremedied procedural unfairness and would be set aside by the Courts.

There is no right to second chances

125. As for SPR, if an applicant does not cooperate or take the chance given to it to set out its case, then there is no unfairness in the Inspectors proceeding to find against an applicant on that issue. In Ecotricity Ltd v Secretary of State for Communities and Local Government [2015] EWHC 801 (Admin), concerning a wind turbine proposal, an issue arose as to the “*intensification of risk to aviation*” which had been raised in a letter of objection from a flying club. The Inspectors considered that the risk was relevant. The Developer challenged the refusal of consent. The challenge failed because the applicant had been put sufficiently on notice and therefore should have addressed the issue. The Court held that it had “*only itself to blame for not dealing with the matter head on*”. There is no principle that entitles applicants to second bites at the cherry.

126. As already observed, if SPR seeks to adduce additional and new evidence to the Secretary of State this will compound the procedural unfairness that already exists.

Relationship to compulsory purchase laws

127. The issue at the heart of this review must be analysed from first principles. In the event that planning consent is granted then a person in possession of such consent is entitled to use compulsory purchase powers. This is an after the event power, where the event is the consent. In the ordinary course the use of compulsory purchase powers is hence conditional upon, and therefore subsequent to, the grant of development consent. It arises only when the planning process has completed.

128. Under the statutory regime a consent holder is entitled to purchase and obtain access to land that it needs to implement the consent given by the decision maker even where the landowner is implacably hostile to the grant of consent and being compelled to sell. In such cases landowners have no freedom of contract. They are not free to refuse to deal with the developer.

129. However, over time a practice emerged of applicants for development seeking to enter agreements with landowners prior to consent. Developers are willing to pay a premium for these pre-consent agreements because it accelerates the development *if* (but only if) consent is subsequently given.

130. The system, by its very nature, imposes a pressure upon landowners to enter the pre-consent conditional agreements. Developers have leverage to pressurise landowners to enter pre-consent arrangements. The leverage arises from the fact that the right of the developers is mandated by Statute and is non-negotiable.

131. That leverage is reinforced by a number of considerations. First, landowners view consent as a more or less inevitable event and this impression is reinforced by agents instructed by developers. Secondly, in the case of major infrastructure projects there is a statutory presumption in favour of consent such that the planning process is significantly weighted in favour of the developer. Thirdly, there is the fact that developers have deep pockets and will offer premium payments to landowners if they sign up early. The premiums offered might be significant.

132. There is no objection in principle to developers seeking pre-agreement in this manner. These pre-agreements set out the terms and conditions that will apply if and when consent is given. To this extent they are

future looking and contingent upon approval. They do not govern the present.

133. The reasons why these pre-agreements are not in principle objectionable is that the “*event*” upon which the sale is contingent i.e. the planning approval, is one arrived at by a fair, objective and transparent procedure conducted in the public interest.
134. However, there is fundamental objection to developers such as SPR using the leverage which this statutory power confers as a device to subvert and undermine the planning process by the imposition of collateral restrictions and prohibition targeted at undermining the planning decision making process and, artificially, increasing the chances of planning consent being given.
135. None of the restrictions imposed and enforced by SPR are connected to compulsory purchase. They are quite different and involve an attack, invariably covert and secret, on the integrity of the planning process.
136. It is relevant that our enquiries have indicated that EDF, in relation to the Sizewell C ongoing planning inquiry, do NOT use any of the above sorts of clauses or restrictions in their compulsory purchase negotiations with affected landowners who are, thereby, perfectly free to object during the inquiry, even though if consent is given, those landowners might then be compelled to enter a compulsory purchase agreement.

Conclusion / ways forward: The position of the Secretary of State

The wider public interest

137. This case raises serious issues of public policy and ethics and concerns whether the Secretary of State will endorse a decision procured by a developer by unethical and covert means and where the adverse effects were then compounded by inactivity on the part of the Inspectors.
138. On 18th January 2021 Clive Betts MP, Chair of the Housing Communities and Local Government Committee of the House of Commons wrote to The Rt Hon Robert Jenrick, Secretary of State for MHCLG concerning the inclusion in cladding funding, agreement of prohibitions on recipients speaking to the press, journalists or broadcaster. The housing minister responded by saying that we live in a free country - “*let them speak*”.

139. The Secretary of State will be aware that the use of gagging and non-participation clauses in Nationally Significant Infrastructure Projects is being reviewed by the Secretary of State for the Department for Levelling Up, Housing & Communities (The Rt Hon Michael Gove) and a team at DLUHC. At their invitation SEAS is making submissions to that exercise on the topic. SEAS will provide this submission and the submission it is making to the SRA, as part of its response to that Review Team.
140. The Secretary of State should be aware that SEAS has also raised this issue with the Green party, local conservative politicians in Suffolk and Norfolk; House of Commons Select Committees, and the national and local press.
141. The Secretary of State also knows that the Rt Hon Dr Therese Coffey considers the conduct of SPR as “*sharp*”.³⁰
142. In a different context Clive Betts MP aired his concern at the use of gagging clauses by developers of new housing. The BBC (13th March 2021) reported an interview he had with the Money Box programme in which Mr Betts said that the practice was “*appalling*”. The Home Builders Federation denied that the use of NDAs was widespread. Though the former CEO of the Chartered Institute for Building said that they were “*quite common*”. He said that the clauses are used to silence people and it is a “*despicable practice*.” The restrictions imposed by SPR in its agreements go way beyond anything that developers of new homes are using.

The importance of ethical decision making

143. It cannot be argued that for a developer to seek to offer secret payments to landowners to prevent them from participating in a public inquiry represents acceptable behaviour which the Secretary of State can condone.
144. It also cannot be argued that the use of such tactics and strategies is sanctioned or part of any legitimate use of compulsory purchase powers.
145. However, if the Secretary of State grants consent to these applications this will amount to an endorsement of SPR’s conduct.
146. There is, with respect, no scope for the Secretary of State, in law, to seek to plug gaps in the evidence. The issue has raised deep concern and anger amongst the residents of Suffolk and Norfolk. If decisions are

³⁰ Transcript of The Rt Hon Dr Therese Coffey MP’s NDA Submission . [REDACTED]

taken upon the basis of a planning process which developers are permitted to undermine, with Ministerial approval, then this will profoundly damage the confidence of the public in the planning process.

147. The Government should be fearless champions of open, fair and transparent planning processes. It is only if decisions are taken in such a way that the public will trust planning decisions. We would invite the Secretary of State to condemn SPR's conduct and make it clear that in the Government's vision for clean energy, ethical decision making is fundamental.

The “in flight argument” – These applications are not even on the runway

148. SPR has sought to argue that it is all now too late for its project to be stalled.
149. The SPR applications remain at an early stage; they are not “*in flight*”. The strategy adopted by SPR was decided upon by them and their lawyers from the very earliest point in time. Landowners were being pressured to sign up from at least early 2020 and possibly during 2019, many months before the Inquiry started.
150. At this point SPR was not even in sight of the airport, never mind not being on the runway, or cleared for take-off, and most certainly not in flight.
151. SPR has taken a calculated gamble that its strategy would remain secret, that it could be used successfully to shift and slant the Inquiry in its favour, that it would get consent, and no one would be any the wiser.
152. It is not open to the Secretary of State therefore to say that this is an ongoing infrastructure project to which some special rule or policy should apply. It is not.

Offshore and onshore – severability

153. This submission makes no representations about the offshore element of the applications. SEAS's concerns lie only with the onshore element. It is for the Secretary of State to consider whether the decision can be split so as to sever the offshore from the onshore elements of the applications.
154. However, if the conclusion of the Secretary of State is that the onshore cannot be severed from the offshore and addressed separately then in law

the applications must be rejected in their entirety. It is not open in law for the Minister to say that, in some way, the public interest necessitates overall consent and that unacceptable conduct by the applicant and developer in relation to the onshore elements of the applications can be swept under the carpet.

Conclusion

155. For all the legal reasons already given it is not open to the Secretary of State to adopt a decision approving the onshore element of the applications since any decision to that effect will have been taken upon the basis of manifestly unfair procedure. It would be set aside by the Courts.

From: [REDACTED]
Sent: 08 October 2021 11:19
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Trevelyan, Minister (Private Office) [REDACTED]
Subject: Reject onshore developments in East Suffolk countryside

Dear Secretary of State,

I am writing about the Nautilus Interconnector consultation process by the National Grid combined with the Scottish Power Renewables now the subject of a planning application. Overwhelmingly, the proposed development is in the wrong place. It is totally illogical to plan to vandalise an area of Outstanding Natural Beauty. It should never have been considered. The government has committed to protect our AONBs and the natural environment. Brownfield, already industrialised, sites are available for the connection of the wind turbines onshore. Possible sites include Bramfield or Clacton. The scale of the development and the consequent impact on the local community in East Suffolk would be massive. The local economy is dependent on tourism: this would collapse with the extensive earthworks planned to service the substation at Friston, including road building. There are cultural activities of international proportions at Snape and events in Aldeburgh. Visitors come from all over the world. The destruction proposed would seem incomprehensible. No civilized country would contemplate this. I urge you to reject the planning application for these onshore developments at this location.

Yours sincerely,
Peter Dickinson

Professor Peter Dickinson

[REDACTED]

From: Karen Crisp [REDACTED]
Received: Sun Oct 10 2021 15:32:09 GMT+0100 (British Summer Time)
To: Enquiry Unit <enquiries@beis.gov.uk>; Enquiries @ BEIS <enquiries@beis.gov.uk>;
Subject: Fwd: Mass energy industrialisation plans for Suffolk coast and heaths

Sent from my iPad

Begin forwarded message:

From: Karen Crisp [REDACTED]
Date: 10 October 2021 at 15:30:42 BST
To: kwasi.kwarteng.mp@parliament.uk
Subject: Fwd: Mass energy industrialisation plans for Suffolk coast and heaths

Sent from my iPad

Begin forwarded message:

From: Karen Crisp [REDACTED]
Date: 10 October 2021 at 15:26:47 BST
To: secretary.state@beis.gov.uk
Cc: minister.state@beis.gov.uk, [REDACTED], offshore.coordination@beis.gov.uk,
info@nautilusinterconnector.com, [REDACTED],
[REDACTED]
Subject: Mass energy industrialisation plans for Suffolk coast and heaths

Dear Mr Kwarteng,

I am writing to you in regards to the proposals for off shore wind energy projects and inter connectors that are widely believed to be planned to connect to the National Grid substation at Friston to form an energy hub. With the addition of sizewell C, this will be the largest complex of energy infrastructure in the UK.

It has not been made clear why a currently beautiful, unspoilt protected rural area has been chosen over brownfield or industrialised site. The destruction caused to the environment, tourist economy and coastal communities will be absolutely devastating. If this goes ahead. I fear this beautiful part of the countryside will become a concrete jungle as doors are opened to future projects. We moved from London a few years ago to be able to enjoy this unspoilt, fragile, stunningly beautiful part of our country. An area indeed of outstanding natural beauty, rich in wildlife, one of only three vegetated shingle beaches I believe in the world, all of this I gravely fear will be destroyed forever if people do not start making the right decisions about the future of energy.

We are all very quick to judge what is happening in the beautiful Amazon rain forests but it is potentially happening here right on our doorstep!

I believe that the decision to accept or reject the applications for EA1N and EA2 lies with you and we would call on you to recommend a split decision which has also been championed by our local MP, The Rt Hon, Dr Therese Coffey, so that the off shore turbines are recommended for consent and that the onshore

infrastructure is rejected in favour of full consideration of better locations where the adverse impacts are minimised at a brownfield or industrialised site.

Yes, to off shore wind energy, but please, please, please, let's do this the right way.

Yours sincerely

Karen and Toby Crisp

Snape residents

Sent from my iPad

Rt Hon Kwasi Kwarteng
Secretary of State at The Department for Business,
Energy and Industrial Strategy



By email

Dear Secretary of State,

Scottish Power Renewables: East Anglia One North and East Anglia Two Proposals

We write concerning the above proposals for EA1N and EA2. These will have a catastrophic effect on the local environment here in East Suffolk, and on the local population.

The proposal is to build three huge substations occupying over 35 acres on the edge of our lovely rural mediaeval village of Friston, with more to follow if this initial proposal is consented.

The location for this construction should be on a brownfield site near the coast, not on a greenfield site in Friston, some five miles inland.

Our Prime Minister, Boris Johnson, made some pertinent comments:

In response to a question from James Cartlidge MP (South Suffolk) during Prime Minister's Question Time, Wednesday 24 February 2021, (Hansard):

"My hon. Friend is spot on in what he says about the need for an offshore grid. As well as building the fantastic windmills, it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency." Hansard

and:

Boris Johnson has said houses should not be built on "green fields" as ministers abandoned proposals for a vast overhaul of planning rules.

In a clear signal to Tory heartlands that he had heard their concerns, Mr. Johnson used his Conservative Party conference speech on Wednesday to acknowledge fears that the countryside would be "desecrated by ugly new homes".

Daily Telegraph: 6th October 2021

While the SPR proposals are not for houses, the desecration principle still applies, but to an even greater degree; even the architecturally most unimaginative housing would be far preferable to the industrial Armageddon that SPR and NG wish to inflict upon the area.

These proposals are but two of many for this small area of Suffolk. Others include: Sizewell C [EDF]; Nautilus – plus onshore convertor station [NGV]; Eurolink – plus onshore convertor station [NGV]; UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors; Five Estuaries [RWE] – proposed offshore windfarm extension; North Falls [SSE & RWE] – proposed offshore windfarm.

Indeed, regarding the recent NGV Nautilus connection proposals, how is it that they are based on the presumption of a Friston connection that hasn't yet been consented?

All of these proposals are being put forward piecemeal, with no consideration of their cumulative impact. One does not need to be a planning expert to realize that this cumulative impact will be devastating for the countryside, for local businesses, many of which rely on tourism, and for the people who live here.

We therefore urge the Secretary of State to consider a split decision on EA1N & EA2, in which the offshore component is consented but the onshore grid connection is rejected. This will give the government and the developers the opportunity to choose a grid connection on a brownfield or pre-industrialised site that has the long-term capacity to act as a wind energy and inter-connection hub, in line with the government's own commitment to protect AONBs and provide more protection for the natural environment. This is advocated by all community groups in the area and also supported by the local MP, Dr. Therese Coffey.

Yours sincerely

Mr Nicholas and Mrs Nichola Winter

On 11/10/2021, 22:50, [REDACTED] wrote:

Dear Greg Hands,

As residents of Friston, a small rural village located on the Suffolk Coast and the proposed site for the EA1N and EA2 Scottish Power and National Grid Nautilus Interconnector substations, we are extremely concerned of the cumulative impact that this and all the other potential energy projects planned for this area will have on the natural beauty and heritage of the Suffolk coast and heaths.

Wind energy and the proposed offshore wind turbines, in addition to the wind farm sites already in existence in this area, will without doubt provide power for many homes but to site the onshore infrastructure miles from the coast by carving a 10km cable corridor through an area of beauty, wildlife and small communities will have a devastating impact and will scar the landscape forever.

Suffolk coast is a haven not only for wildlife such as RSPB Minsmere, but also for people to enjoy the peace and beauty of the outdoors and to come on holiday as we once did before moving here [REDACTED] ago to work.

Every day we walk around our village, we see buzzards, rare species like yellowhammers, hares, and hear skylarks and with the recent investigation and trenching works by SPR have seen what is to come with the 100 acres of devastating plans by Scottish Power and National Grid to build in Friston; we walk footpaths across the fields to Knodishall, the site of the 10km cable route; at the weekend we walk the dog or Parkrun on the beach at Sizewell where Sizewell C will be built.

Every aspect of our working and recreational lives and that of residents, businesses and tourism in places like Aldeburgh, Thorpeness and Snape are under threat from the adverse impacts of years and years of construction which will destroy the natural environment and reshape the culture of this area forever.

Brownfield or industrialised sites alternatives must be fully considered, such as an expansion of Bramford or grid connection at Bradwell, Essex, as Scottish Power has failed to manage and ignored the views of local communities. Our own MP Therese Coffey is calling for a split decision, she knows the area and the energy issues we are facing here on the Suffolk coast.

To accept the applications for EA1N and EA2 and approve the proposed grid connections 'at any cost' will be an historic failure of stewardship and pave the way – in concrete – for future National Grid projects.

We are all well aware locally of the proposed for this small geographic area:

Sizewell C [EDF]
EA1N windfarm and substation [Scottish Power]
EA2 windfarm and substation [Scottish Power]
Nautilus – plus onshore convertor station [NGV]
Eurolink – plus onshore convertor station [NGV]
UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
Five Estuaries [RWE] – proposed offshore windfarm extension
North Falls [SSE & RWE] – proposed offshore windfarm

Cumulative Impact has not been properly assessed in Scottish Power's EA1N & EA2 examinations, let alone in conjunction with the obvious impact of a Sizewell C construction and other proposed projects. In the absence of this assessment and given all the environmental damage these projects will do onshore, we ask that you consider a split decision on Anglia One North & East Anglia Two (EA1N & EA2).

To give you an idea of typical 'rush hour 8-9am' in the morning in Friston, from our road, The Meadows and walking to the Village Hall, comprises an average of 7 cars, 5 vans and 2 school buses, there and back.

Unlike a Non-Technical Summary document (PEI vol 1) from Scottish Powers this is based on reality and not 'desk based assessments'. It is inconceivable to think of HGVs, 300 workers and construction traffic travelling the roads to the proposed site of the 2 substations and national grid substation. Alongside this will be hundreds of HGVs for the construction of Sizewell just a few miles down the road and thousands of construction workers that will be 'brought in' to work on its construction for almost a decade.

In the early consultation process desk based research seemed the order of the day in most of SPR's assessments. In its own documentation it stated 'Habitats would be reinstated as far as possible' and there will be risk and injury to 'badgers, bats, voles and reptiles'.

The coronavirus pandemic encouraged many to go outdoors and walk in their local environment. The impact on human health to communities affected by the gigantic construction process will be significant. The distress already of local residents is very real, resulting in sleepless nights, discussions around loss of choice about where we live, noise and light pollution and the reality that we may no longer be able to walk the local footpaths, penned in all sides surrounded by acres of industrial compounds and former quiet lanes now widened roads to make way for HGVs.

Yours sincerely
Mr Karen Flower and Mr Mike Flower

From: [REDACTED]

Sent: 11 October 2021 15:30

To: Enquiry Unit <Enquiries@beis.gov.uk>; Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk

Subject: EA1N and EA2 DCO Applications

For the attention of :

The Rt.Hon. Kwasi Kwarteng - Secretary of State for Business, Energy and Industrial Strategy (BEIS)

Dear Secretary of State

I am a resident of Friston - we have had a home here for [REDACTED] - and write in respect of the National Planning Inspectorate Report on the Inquiry into the Scottish Power Renewables (SPR) /National Grid (NG) DCO Application for three substations at Friston, Suffolk within the heart of the Suffolk Heritage Coast.

I vehemently oppose the siting of the onshore infrastructure for the offshore windfarm connections of EA1N and EA2 here at Friston when more suitable sites should be considered as part of your ongoing reviews for greater strategic planning and coordination within the energy sector. I support arguments for a 'split' decision which would permit the continued development of the offshore windfarms and the associated employment opportunities, but allow for greater consideration to maximise onshore strategic planning and coordination.

I support renewable energy as necessary to alleviate the effects of climate change, albeit I harbour reservations as to whether wind power can achieve the certainty of continuous supply when seeking diversity in the sources of supply.

I have no knowledge of the content or recommendations of the Report now with you, but set out below the overall bases of my opposition.

1 - Engineering

I am a layman with a banking background and have no experience of electrical engineering. However, the Inquiry did not address in great detail the engineering necessity to establish this new connection point at Friston when it was originally conceived that the connection points would be at the already established substation at nearby Bramford. Even now the finalisation of designs is 'post-consent'. Since these are massive infrastructures, their scale and impact are material to the surrounding environment, landscape and community.

Yet each substation accommodates just one gigawatt of power. Recent government proclamations are for wind power to provide between 40-65 gigawatts. Does that imply the need for that number of connection points, substations and cable corridors across coastal rural communities? It is acknowledged that wind power is intermittent, but battery storage was not addressed as part of the Inquiry and I understand is prohibitively expensive. In any case what would be the scale and location of storage facilities?

2 - Site Selection

This has been opaque and, desk-based, it is incredible that the only suitable site should be in the heart of an area of outstanding beauty, renowned for its peace, tranquillity and cultural appeal.

There is already an established and more accessible substation complex at Bramford.

Bearing in mind the energy need is driven by the needs of London and the South East and Norwich, why are not alternative brownfield sites or those in more remote locations closer to those areas in most need?

What about Bradwell on the Essex Coast? And as originally questioned by local communities and visitors to the area - why not centralised at Sizewell, rather than the sprawl over the whole area as shown in the attached map?

3 - Cumulative Impacts

These have not been sufficiently addressed by the Applicants - a significant failure to meet the requirements of even the outdated planning principles..

It is disingenuous for the applicants to claim insufficient information on projects which have been in the energy industry domain for some years.

a) National Grid Ventures (NGV) Nautilus Interconnector

Having suffered three years of continuing uncertainty relating to the SPR/NG projects, the Inquiry and now the decision early in 2022, we are now subject to repeating the exercise with NGV having commenced local consultation about the siting of their interconnector before even approval of the original projects! Why is that? - Not least considering the depth and breadth of opposition to those projects?

b) Eurolink Interconnector

It is well known that NGV have plans to establish here a second European Interconnector link.

c) Five Estuaries Windfarm (Gallop Extension)

d) North Falls Windfarm (Greater Gabbard Extension)

Both the above are extensions to existing offshore windfarms whose connection points are at Sizewell. Neither have yet been offered connection points and it is obvious that if SPR/NG are approved, Friston will become the natural target connection points.

e) Sizewell to Kent Reinforcement Links

Known as SCDA1 and SCDA2 these would cause further local disruption.

f) Sizewell C

Looming over all the above is the massive Sizewell C. Its own DCO Examination is due to complete shortly. Given current supply concerns and comment, it seems likely to be approved notwithstanding the arguments surrounding nuclear waste and availability of uranium.

This alone is a project lasting up to 12 years and an influx of a 7,500 workforce at its peak.

This would coincide with the other energy projects described above so all this activity would extend over the same period and run the risk of being extended arising from technical and supply considerations.

Social Cost

This is an intolerable burden of uncertainties and disruption for local communities in such a small geographical area who have no comprehension of the scale of what is being proposed: - The scale of the infrastructures.

- The individual cable corridors, each one the width of a motorway.
- Landfall entry points on a coast notorious for its erosion and subject to imminent review of sea defences.- The disruption to life and business, threats to local employment in the hospitality and trade sectors being 'crowded out' over the extended period.
- The destruction of the local environment, biodiversity, access to the countryside and nature so vital to health and wellbeing; all demonstrated by the visitor economy and embedded in government legislation. - How will our local Suffolk County and East Suffolk Councils cope with the demands on local infrastructure and services, housing demands, social and health care when key resources have been diminished. Local authority spending per person has fallen by 25% since 2010, and Suffolk has a substantial ageing population.
- How does the local population protect itself from the cumulative effects and consequences from these and other major expansion projected in the local digital economy and Freeport at Felixstowe/Harwich. Who is planning for all this?

Finally, I can testify to the mental stress this has caused. Coinciding with lockdown and one's charitable activities (local communities depend substantially on the volunteering retired), inordinate and stressful time continues to be spent trying to understand and prepare for the turmoil before us when we are in our advanced years.

Conclusion

In sum, the cumulative impacts of the onshore damage caused by all these projects requires a split decision which allows for the continued development of the offshore windfarms whilst allowing time for a more coordinated and centralised approach to better siting of the onshore sites as part of the BEIS Review and Offshore Transmission Network Review.

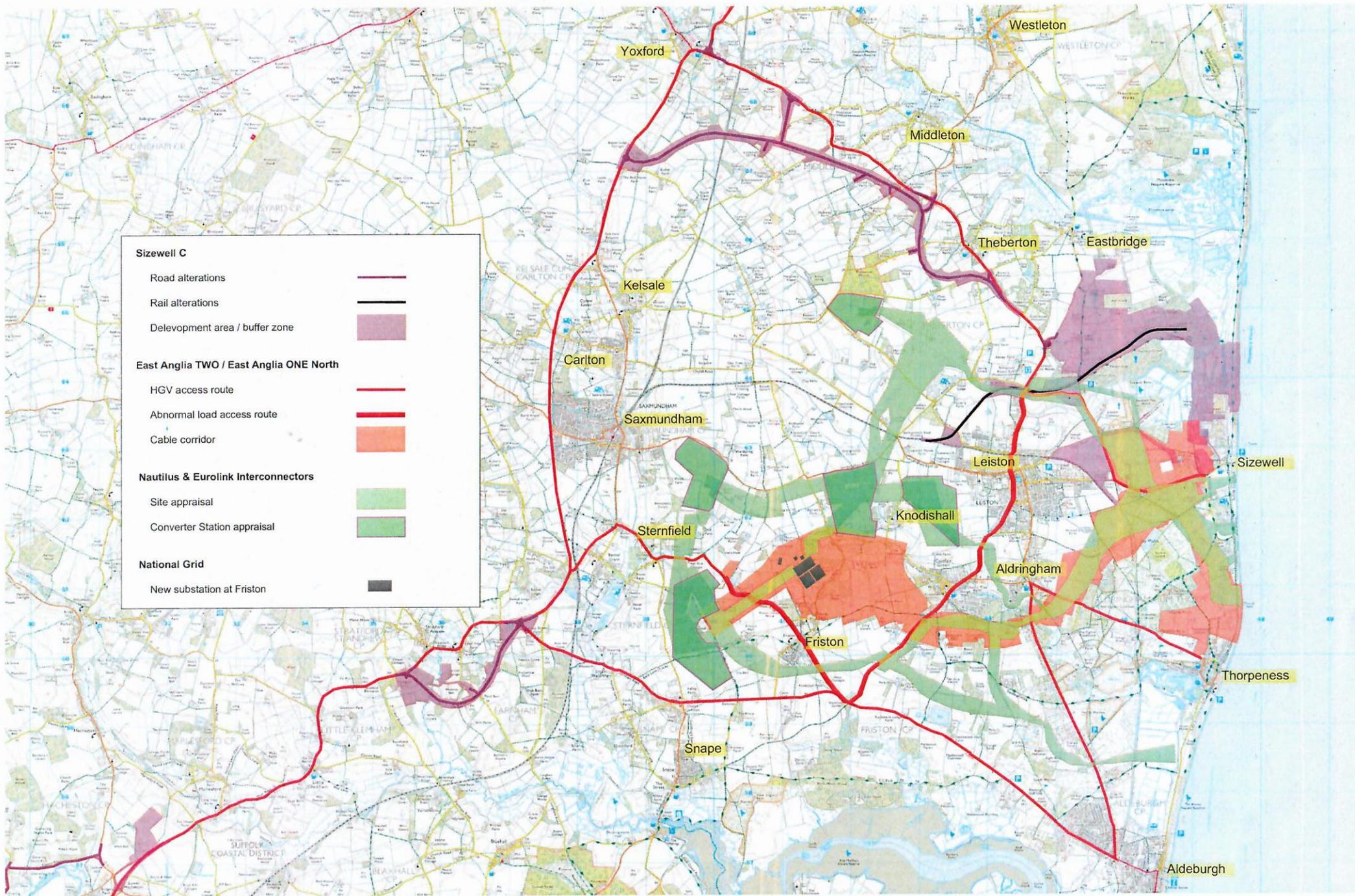
Yours faithfully

Simon Ive

Resident and Secretary and Treasurer, Friston Parochial Church Council

PINS Regd IDs: 20023671/20023672

Friston PCC: 20023636/20023639



Sizewell C

- Road alterations
- Rail alterations
- Development area / buffer zone

East Anglia TWO / East Anglia ONE North

- HGV access route
- Abnormal load access route
- Cable corridor

Nautilus & Eurolink Interconnectors

- Site appraisal
- Converter Station appraisal

National Grid

- New substation at Friston

-----Original Message-----

From: Jan Bullard [REDACTED]

Sent: 11 October 2021 11:50

To: Offshore Coordination <offshore.coordination@beis.gov.uk>

Subject: Application by Scottish Power Renewables for EA1N and EA2

> APPLICATION BY SCOTTISH POWER RENEWABLES FOR EA1N EA2

> Dear Sirs,

> I write to you as a resident of Friston. I am deeply concerned about the effect the above proposal would have, not only on Friston but on the Suffolk coastline and its towns and villages.

>

> This is a stunning and historic part of our country. Over very many years the people of Suffolk have curated a healthy and precious balance between tourism and the preservation of land, wildlife, shoreline, ancient pathways, and the general way of life. It is a welcoming haven to many visitors who, in turn, provide a living for many of the residents.

>

> The above proposal would completely destroy that wonderful balance, utterly wreck so much of the landscape, flora and fauna, and decimate the thriving tourism.

>

> Mr Boris Johnson has been much quoted in his determination to bring green energy onshore in a way that does not destroy countryside and communities in its wake. We are all in favour of green energy. However, now that we have the technology to convert energy from wind farms offshore, I ask that the above proposals be rejected and that Scottish Power and National Grid be asked to consider a much greener approach towards the land and lives that they are presently proposing to dig up.

>

> Many thanks.

>

> Very best wishes,

> Jan Bullard

>

> [REDACTED]

> [REDACTED]

> [REDACTED]

> [REDACTED]

>

> Sent from my iPad

From: Paul Carlaw [REDACTED]
Sent: 12 October 2021 15:10
To: HANDS, Greg [REDACTED]
Subject: Scottish Power Renewables - EA1N & EA2 - Rt. Hon Greg Hands MP

The Rt Hon Greg Hands
BEIS

Dear Mr Hands,

Scottish Power Renewables - EA1N and EA2 - Windfarms

I am aware the final report has been issued for the above projects by the Planning Inspectorate to BEIS being responsible for making the final decision regarding SPR's application for two Windfarms on the Suffolk coast.

I want to express my great concern over the proposed **onshore element** of the above projects which in part constructs a cable corridor the width of an eight-lane motorway inland (64m wide and order limit of 70m) from Thorpeness through an area of outstanding natural beauty, to then create an industrial development on prime agricultural land the edge of the historic village of Friston. If this project is allowed to proceed as proposed, it would be the largest connection point ever constructed in mainland UK for a windfarm. It would also open the doors and be the catalyst to allow other projects to follow which are detailed below. The proposal is unacceptable in so many ways.

I fully support green energy but an appropriate onshore connection point must be found to reduce the environmental impact. Several alternatives for the onshore elements were proposed by many participants at the hearings including those from the Rt. Hon. Dr Therese Coffey, Cabinet Minister, and local MP for this region. Dr Coffey supports a split decision for the projects i.e., approve the offshore element and reject the onshore proposals.

Suffolk cannot bear the brunt of the significant cumulative impact of the various projects which will follow and I do not believe they were fully considered as part of the Planning Inspectorate's review. I attended every virtual event and although cumulative impact was mentioned the full list of the projects proposed were not fully considered based on the significant impact that will result.

Consultation has already commenced for Nautilus proposed by National Grid Ventures (which assumes that EA1N and EA2 will be approved – Nautilus will not proceed if EA1N & EA2's onshore work is rejected). There are proposals in planning to try and bring in the following additional projects to Friston on the back of SPR's proposals – this is a small unspoilt ancient village and the projects proposed cannot be allowed to destroy the countryside, tourism, biodiversity etc. The small rural roads are not large enough to take construction vehicles along with the pollution that will follow over an eight-to-ten-year construction period.

The cable corridor for Nautilus would be 50m wide in another adjacent location (to be confirmed) so further devastating the countryside, in addition to the carnage created for EA1N and EA2.

The cumulative impact of the following projects must be considered before making decisions for the two projects EA1N and EA2.

- Nautilus and Eurolink onshore convertor stations [NGV]
- UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
- Five Estuaries [RWE] – proposed offshore windfarm extension North
- Falls [RWE] - proposed offshore windfarm extension.
- Sizewell C [EDF]

Alternative solutions presented during the hearings would reduce environmental impact whilst using an existing site that has already been developed and/or the use of a brownfield site. If EA1N and EA2 is allowed to proceed as suggested it would devastate the Heritage Coast due to cumulative impact, destroy its historic paths with the loss of a Pilgrims Way, impacting not only on the village of Friston but also the surrounding villages, wetlands, the historic village church whilst creating an industrial wasteland in a tranquil and peaceful part of Suffolk.

In summary, Scottish Power Renewables have not fully considered or modelled the cumulative impact of **other projects** further impacting on the industrialisation of the historic and beautiful Suffolk Coastal region, its paths and its tranquillity – the wetlands, tourism and wildlife must be protected.

A new solution must be found and, on that basis, the **onshore works must be rejected**.

Yours sincerely,

**Paul Carlaw BSc (Hons) MRICS
Chartered Surveyor**

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From: Philip Larking [REDACTED]

Sent: 12 October 2021 23:50

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED]

Offshore Coordination <offshore.coordination@beis.gov.uk>; ,martin.moran@nationalgrid.com,

[REDACTED] <info@nautilusinterconnector.com>

Subject: Energy Projects Suffolk Coast

Dear Sirs,

I write in my humble capacity as a permanent resident of Friston village, which appears to be the preferred epicentre for the destruction of the East Suffolk countryside .I don't know anyone who doesn't want clean green energy but not at the expense of destroying the environment in which it is proposed. I am sure you have heard all the valid arguments from the NIMBYS of which I am inevitably one if only because I live in Friston so I will not repeat them. Offshore windfarms are clearly a step in the right direction however more thought has to be given to where the onshore infrastructure is to be sighted. So far we have had little or no satisfactory answer from Scottish Energy Renewables as to why they would want to chose the furthest point from landfall, and by definition the most expensive, to build their substations when there were cheaper & less intrusive options. It is now clear that they were encouraged by National Grid who want substantial land mass to house their Nautilus Iinterconnector and almost certainly further projects. So Friston becomes the sacrificial lamb, the duplicity is mind boggling. Friston itself is & has been in the past subject to storm flooding, the proposed massive concrete footprint will inevitably increase the risk. The damage to the local economy from visitors for coastal walkers with removal of footpaths, damage to environment & wildlife particularly during construction phase will be enormous. The disruption to the daily lives of residents, many of whom like me moved here for a quiet life, will be catastrophic.

There needs to be a complete rethink as to where the onshore infrastructure is to be sighted Have the parties concerned not heard of Brown Field development or joining up with Sizewell or Bradwell. Be assured that the proposed destruction of the green Suffolk countryside will rebound with echoes of what happened at Beaconsfield with Blue Members of Parliament turning yellow or heaven forbid Red !

Yours faithfully
Philip Larking

From: [REDACTED]

Sent: 12 October 2021 10:47

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

Subject: Scottish Power Renewables, EA1N and EA2 wind projects & National Grid Ventures - Nautilus Interconnector

The Rt Hon Kwasi Kwarteng MP,

Secretary of State for the Department of Business, Energy and Industrial Strategy

Dear Mr Kwarteng,

We were deeply disturbed to learn of the plans for further energy infrastructure in East Suffolk, in the form of Nautilus, a multi-purpose interconnector.

Given the existing planning applications for Scottish Power Renewables, EA1N and EA2 onshore infrastructure at Friston and the proposals for Sizewell C's nuclear energy facility, it appears that the suggestions of mass energy industrialisation planned for our East Suffolk Coast and Heaths is no exaggeration. During the consultation process for both projects, we have written to raise our concerns and objections to the proposals. Energy infrastructure in East Suffolk would be hugely damaging and destructive to our coast, its rural landscape, including AONB, to its wildlife, its communities and to its tourism economy.

We are wondering if the policy paper, The natural choice: securing the value of nature, published by the Conservative and Liberal Democrat coalition a few years ago, is still being given consideration, prior to infrastructure planning and consent. That policy tells us that 'Too many benefits we derive from nature are not properly valued'. We value them that's why we moved to the East Suffolk Heritage Coast. It tells us that 'When nature is undervalued, bad choices can be made'. Please don't undervalue the importance of our East Suffolk Coast and Heaths. The policy also tells us that 'We need a more strategic and integrated approach to planning for nature within and across local areas, one that guides development to the best locations, encourages greener design and enables development to enhance natural networks for the benefit of people and the environment as part of sustainable development'. It says, 'We will retain protection and improvement of the natural environment as core objectives for local planning and development management'. It further refers to new energy infrastructure of the scale needed, as having the potential to cause adverse impacts on some aspects of the natural environment, even taking account of the mitigation measures.

We could go on making many more statements from the policy paper, or indeed statements and observations on a more personal level. Infrastructure development, any development can be and is often very contentious for those directly affected by its impact. It is about finding a balance and being aware that other things matter. We are acutely aware that energy matters. We want to see a greener and more sustainable approach to meeting our future energy needs. But, other things matter to us too and to others that cherish this rural location. Let's find a balance. Yes, to renewables. Yes, to the offshore turbines being recommended for consent. **No**, to the onshore mass infrastructure currently being planned for East Suffolk, on the basis that it is ill considered, unnecessary and unacceptable, on so many levels. The cumulative impact of these projects in such a small area would be devastating. There are no mitigation measures for mass energy industrialisation in East Suffolk. There are however, other solutions for onshore wind energy infrastructure and interconnectors. We would urge you to consider the Scottish Power Renewables, EA1N & EA2 project and for future projects like Nautilus, a grid connection on a brownfield or industrialised site, where impacts on nature and its communities could be minimised. We understand that our local MP, The Rt Hon Dr Therese Coffey MP has already championed such a proposal for the EA1N and EA2 onshore infrastructure. Alternatively, offshore solutions should be explored, which would minimise the need for connections onshore. We know

that both of these suggestions have the support of many of our local communities, residents and business operators alike, as well as visitors to this much loved area.

We hope that a proper balance can be found in moving forward with our greener energy needs, whilst securing the value of nature in East Suffolk.

Yours sincerely,

Mrs Lesley Swann & Mr John Swann



From: christine laschet [REDACTED]

Sent: 13 October 2021 07:56

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED]

Offshore Coordination <offshore.coordination@beis.gov.uk>; Aldringham Parish Council
<pc@aldringhamcumthorpe.suffolk.gov.uk>; info@nautilusinterconnector.com;

Subject: Application for Nautilus Interconnector onshore siting and routing.

Dear Secretary of State, i'm emailing to ask that you turn down the application from Nautilus Interconnector.

For me the clearest reason for rejecting all onshore development in this area at this specific location is the impact and destruction upon biodiversity in local, unique habitats – our local natural legacy, our 'rain forest' which cannot be replaced.

We have been responding and objecting to SPR EA1N and EA2 for years and our objections remain the same in respect to the launching of Nautilus Interconnector . The onshore projects are in grave danger of despoiling a rural area, rich in wildlife and nature. Mitigation cannot replace eco systems which have taken many generations to build.

–The proposed multiple cable corridors each as large as a motorway in width, will destroy much of our countryside in the area around the proposed sitings and routing options, particularly destructive through the fragile cliffs at Thorpeness, across the Suffolk Coastal path , the Suffolk Sandlings and Coastal and Heaths area of Outstanding Natural Beauty (AONB) and on to the ancient village of Friston .There are many reasons for local people's objections with which I agree such as

^ the destruction of the countryside , communities and the local economy being trashed by curtailment of the tourism on which the area depends for work.

^The total unsuitability for access by large lorries on our small roads and settlements. After the initial building of the cable corridors and substations there will be little opportunities for local employment with these projects.

We all hear the appeals to conserve our countryside and nature before it is too late. David Attenborough has made countless documentaries about the loss of habitat and the life it sustains, his message is clear- once they are gone they are gone forever.

The Chief Executive of the RSPB Beccy Speight wrote in Nature Home Winter 2020 page 7, ' I find the decline in nature within my lifetime unbearable. '

Kate Humble recently walked 11 miles of the shingle coast from Minsmere to past Sizewell B Power station, to Aldeburgh for a Channel 5 TV programme, the shingle coast was described as one of only a few in the world which can sustain rare plants.

Just this week a study by scientists at London's Natural History Museum has found that Britain is one of the worst –rated nations in the world for the extent to which its ecosystems have retained their natural animals and plants. 'Britain has lost more of its natural biodiversity than almost anywhere else in Western Europe, the most of all G7 nations and more than many other nations such as China.' This has been led by Professor Andy Purvis- who is about to begin online discussions for the UK biodiversity Conference(Cop15) this very week.

This destruction has to come to a halt .

SPR ecological survey wrongly noted there is nothing of great interest in the area around Aldringham, ignoring a very valuable habitat including North Warren and River Hundred which supports many endangered species in this special part of East Anglia. The National Biodiversity Database list 876 observed

species many of them red listed, in a 100 metre circle near the B1122 and Gypsy Lane. (see attached Annexe Species recorded by Dr Gill Horrocks.

We all know we need to replace fossil fuel with renewable energy and we are not against the windfarms at sea, it is the needless and piecemeal destruction of the countryside it would entail if the planning applications go ahead. Why, when an integrated hub at sea which can be fed into a brownfield or industrialised site?

I would ask that you recommend 'a split decision' to recommend offshore turbines for consent and the onshore infrastructure is rejected in favour of better locations such as a brownfield or industrialised site as our MP the Rt Hon Terese Coffey has advocated. Thus ultimately the opportunity to get renewable energy right and accelerate the government's wind energy targets,as we all want.

Christine LASCHET

[REDACTED]

[REDACTED]

12.10.21

Annex

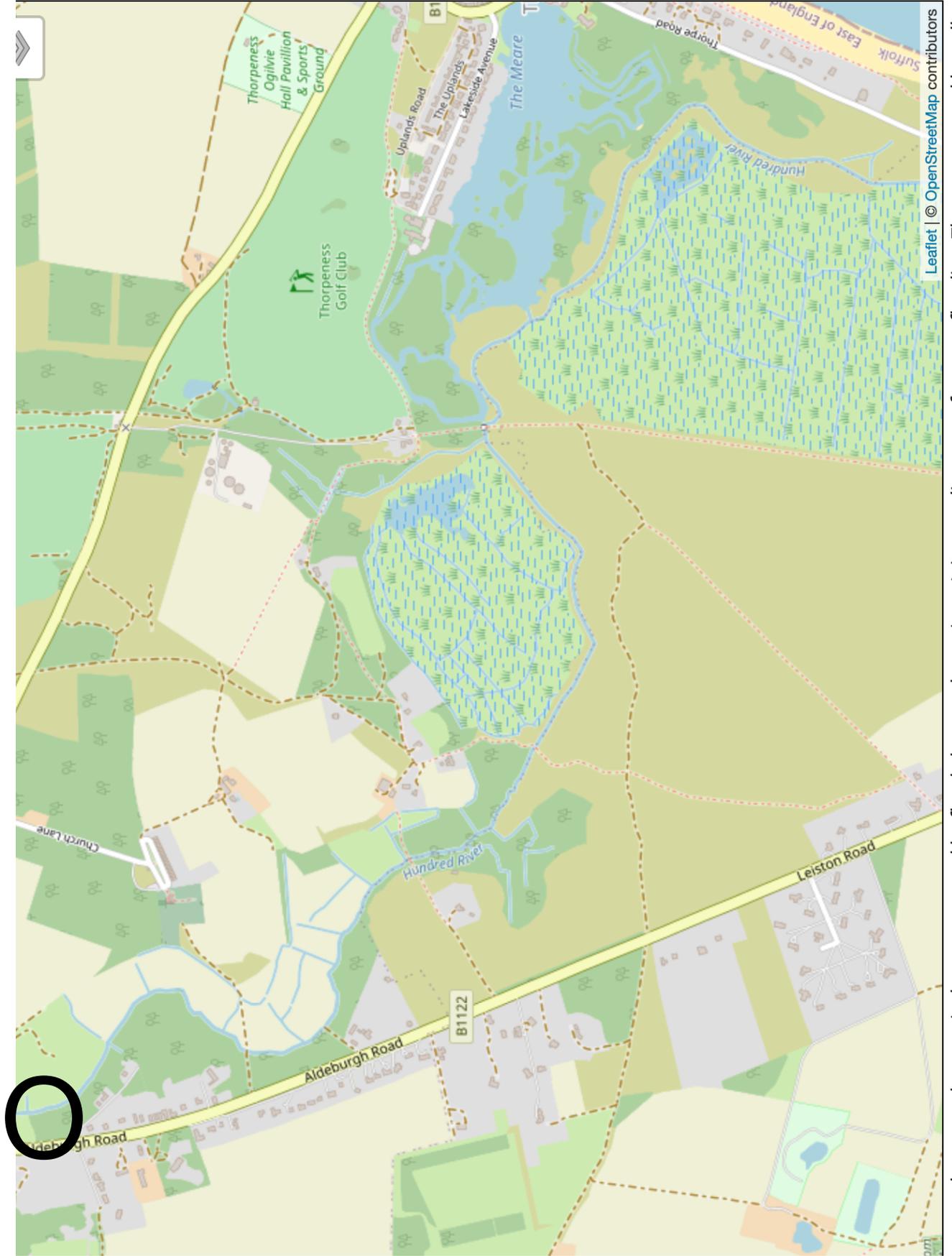
List of wildlife affected by bisection of River Hundred

The River Hundred is now a slow-moving, narrow, water course, although its flood plain, and the Bronze Age burial mounds situated high on the ridged edges of this, show that it was once a navigable river with its estuary somewhere south east of Thorpeness Mere.

SPR's trenching plans will bisect River Hundred just over 1000m north of the lush, marshy areas that it irrigates in its valley, where horses, cattle and sheep graze. Once beyond Bird's Farm and River Hundred (House), the river creates a fen (including North Warren RSPB reserve), before feeding Thorpeness mere, and the water meadows between Thorpeness and Aldeburgh where migrating birds overwinter and cattle graze.

Despite its narrow aspect, the River Hundred is able to support kingfishers, otters, grass snakes, and other hunting aquatic species as well as water voles, very close to, or at the bisection point. An absence of **records** of fish, crustaceans and European eels (another endangered species) does not mean that fish, crustaceans and eels are absent: the predators would not survive without them. In any case, the rich diversity of wildlife in the marshes and in the fen plainly will not stay there when there is a watercourse to explore.

The River Hundred, from 'Bisection'(O) to coastal marshland



Observers' records (not transects), have spotted **876 living species** within a 1000m circle of the proposed bisection point of the river.¹ These include many endangered and/or declining species, from protected mammals like water voles, to orchids, to unusual lichens on the trees around Aldringham Court (which are destined for felling).

Animals	280
Amphibians	5
Arthropods	134
Insects	134
Birds	87
Fishes	0
Mammals	19
Molluscs	31
Reptiles	4
Fungi	187
Plants	408
Bryophytes	51
Ferns and Allies	4
Flowering Plants	347
Gymnosperms and Ginkgo	6

¹ National Biodiversity Database

Selected lists of species, with known declining species in bold.

Mammals

1	Yellow necked mouse	1
2	<u>Apodemus sylvaticus</u> : Wood Mouse	36
3	<u>Arvicola amphibius</u> : European Water Vole	4
4	<u>Cervus elaphus</u> : Red Deer	16
5	<u>Erinaceus europaeus</u> : West European Hedgehog	23
6	<u>Lutra lutra</u> : European Otter	3
7	<u>Meles meles</u> : Eurasian Badger	3
8	<u>Muntiacus reevesi</u> : Chinese Muntjac	103
9	<u>Mus musculus</u> : House Mouse	1
10	<u>Mustela erminea</u> : Stoat	18
11	<u>Neovison vison</u> : American Mink	1
12	<u>Oryctolagus cuniculus</u> : European Rabbit	112
13	<u>Pipistrellus pipistrellus</u> : Pipistrelle	2
14	<u>Plecotus auritus</u> : Brown Long-eared Bat	3
15	<u>Rattus norvegicus</u> : Brown Rat	9
16	<u>Sciurus carolinensis</u> : Eastern Grey Squirrel	111
17	<u>Sorex araneus</u> : Eurasian Common Shrew	1
18	<u>Talpa europaea</u> : European Mole	102
19	<u>Vulpes vulpes</u> : Red Fox	91

Reptiles

1	Anguis fragilis: Slow Worm	10
2	<u>Natrix helvetica</u> : Grass Snake	23
3	<u>Zootoca vivipara</u> : Common Lizard	9

Amphibians

		79
1	Bufo bufo: Common Toad	64
2	<u>Lissotriton vulgaris</u> : Smooth Newt	40
3	<u>Rana temporaria</u> : Common Frog	91
4	<u>Triturus cristatus</u> : Great Crested Newt	4

Birds

1	Redpoll	3
2	<u>Accipiter nisus</u> : Sparrowhawk	115
3	<u>Aegithalos caudatus</u> : Long-tailed Tit	138
4	<u>Alauda arvensis</u> : Skylark	7
5	<u>Alcedo atthis</u> : Kingfisher	3
6	<u>Alectoris rufa</u> : Red-legged Partridge	2
7	<u>Anthus pratensis</u> : Meadow Pipit	2
8	<u>Apus apus</u> : Swift	29
9	<u>Ardea cinerea</u> : Grey Heron	18

10	<u>Athene noctua</u> : Little Owl	7
11	<u>Bombycilla garrulus</u> : Waxwing	2
12	<u>Buteo buteo</u> : Buzzard	3
13	<u>Calidris alpina</u> : Dunlin	1
14	<u>Caprimulgus europaeus</u> : Nightjar	10
15	<u>Carduelis carduelis</u> : Goldfinch	99
16	<u>Certhia familiaris</u> : Treecreeper	129
17	<u>Chloris chloris</u> : Greenfinch	131
18	<u>Chroicocephalus ridibundus</u> : Black-headed Gull	7
19	<u>Columba oenas</u> : Stock Dove	8
20	<u>Columba palumbus</u> : Woodpigeon	143
21	<u>Corvus corone subsp. corone</u> : Carrion Crow	1
22	<u>Corvus corone</u> : Carrion Crow	18
23	<u>Corvus frugilegus</u> : Rook	19
24	<u>Corvus monedula</u> : Jackdaw	65
25	<u>Cuculus canorus</u> : Cuckoo	2
26	<u>Cyanistes caeruleus</u> : Blue Tit	145
27	<u>Delichon urbicum</u> : House Martin	44
28	<u>Dendrocopos major</u> : Great Spotted Woodpecker	140
29	<u>Emberiza citrinella</u> : Yellowhammer	11
30	<u>Emberiza schoeniclus</u> : Reed Bunting	1
31	<u>Erithacus rubecula</u> : Robin	144
32	<u>Falco tinnunculus</u> : Kestrel	8
33	<u>Fringilla coelebs</u> : Chaffinch	148
34	<u>Fringilla montifringilla</u> : Brambling	8
35	<u>Gallinago gallinago</u> : Snipe	2

36	<u>Gallinula chloropus</u> : Moorhen	28
37	<u>Garrulus glandarius</u> : Jay	130
38	<u>Hippolais icterina</u> : Icterine Warbler	1
39	<u>Hirundo rustica</u> : Swallow	24
40	<u>Jynx torquilla</u> : Wryneck	1
41	<u>Larus argentatus</u> : Herring Gull	2
42	<u>Larus canus</u> : Common Gull	2
43	<u>Larus fuscus</u> : Lesser Black-backed Gull	1
44	<u>Linaria cannabina</u> : Linnet	5
45	<u>Loxia curvirostra</u> : Common Crossbill	1
46	<u>Lullula arborea</u> : Woodlark	20
47	<u>Luscinia megarhynchos</u> : Nightingale	1
48	<u>Lymnocyptes minimus</u> : Jack Snipe	1
49	<u>Motacilla alba subsp. yarrellii</u> : Pied Wagtail	2
50	<u>Motacilla alba</u> : Pied/White Wagtail	3
51	<u>Muscicapa striata</u> : Spotted Flycatcher	6
52	<u>Numenius arquata</u> : Curlew	1
53	<u>Parus major</u> : Great Tit	144
54	<u>Passer domesticus</u> : House Sparrow	5
55	<u>Passer montanus</u> : Tree Sparrow	3
56	<u>Pariparus ater</u> : Coal Tit	137
57	<u>Phasianus colchicus</u> : Pheasant	88
58	<u>Phylloscopus collybita</u> : Chiffchaff	65
59	<u>Phylloscopus trochilus</u> : Willow Warbler	5
60	<u>Pica pica</u> : Magpie	141
61	<u>Picus viridis</u> : Green Woodpecker	117

62	<u>Plectrophenax nivalis</u> : Snow Bunting	1
63	<u>Prunella modularis</u> : Dunnock	135
64	<u>Pyrrhula pyrrhula</u> : Bullfinch	22
65	<u>Regulus ignicapilla</u> : Firecrest	4
66	<u>Regulus regulus</u> : Goldcrest	64
67	<u>Saxicola rubetra</u> : Whinchat	1
68	<u>Saxicola rubicola</u> : Stonechat	2
69	<u>Scolopax rusticola</u> : Woodcock	7
70	<u>Spinus spinus</u> : Siskin	29
71	<u>Streptopelia decaocto</u> : Collared Dove	63
72	<u>Streptopelia turtur</u> : Turtle Dove	4
73	<u>Strix aluco</u> : Tawny Owl	36
74	<u>Sturnus vulgaris</u> : Starling	6
75	<u>Sylvia atricapilla</u> : Blackcap	61
76	<u>Sylvia borin</u> : Garden Warbler	4
77	<u>Tadorna tadorna</u> : Shelduck	1
78	<u>Troglodytes troglodytes</u> : Wren	143
79	<u>Turdus iliacus</u> : Redwing	33
80	<u>Turdus merula</u> : Blackbird	146
81	<u>Turdus philomelos</u> : Song Thrush	92
82	<u>Turdus pilaris</u> : Fieldfare	6
83	<u>Turdus torquatus</u> : Ring Ouzel	2
84	<u>Turdus viscivorus</u> : Mistle Thrush	85
85	<u>Tyto alba</u> : Barn Owl	7
86	<u>Upupa epops</u> : Hoopoe	1
87	<u>Vanellus vanellus</u> : Lapwing	1

Insects

1	Abraxas grossulariata (magpie moth)	2
2	<u>Acronicta leporina</u> : Miller	2
3	<u>Aeshna cyanea</u> : Southern Hawker	21
4	<u>Aeshna mixta</u> : Migrant Hawker	19
5	<u>Aglais io</u> : Peacock	94
6	<u>Aglais urticae</u> : Small Tortoiseshell	26
7	<u>Amara aenea</u> : Common Sun Beetle	3
8	<u>Anaciaeschna isoceles</u> : Norfolk Hawker	2
9	<u>Anax imperator</u> : Emperor Dragonfly	15
10	<u>Anoplius viaticus</u> : Black-banded Spider Wasp	1
11	<u>Anthocharis cardamines</u> : Orange-tip	60
12	<u>Aphantopus hyperantus</u> : Ringlet	42
13	<u>Apomyelois bistriatella</u> : Heath Knot-horn	1
14	<u>Arctia caja</u> : Garden Tiger	2
15	<u>Arctia villica</u> : Cream-spot Tiger	1
16	<u>Argynnis paphia</u> : Silver-washed Fritillary	1
17	<u>Argyresthia retinella</u> : Netted Argent	1
18	<u>Aricia agestis</u> : Brown Argus	9
19	<u>Autographa gamma</u> : Silver Y	2
20	<u>Biston betularia</u> : Peppered Moth	2
21	<u>Blastobasis lacticolella</u> : Wakely's Dowd	1
22	<u>Bombus hypnorum</u> : Tree Bumblebee	1

23	<u>Bombus lapidarius</u> : Large Red-tailed Bumblebee	1
24	<u>Bombus lucorum</u> : White-Tailed Bumble Bee	2
25	<u>Bombus pascuorum</u> : Common Carder Bee	2
26	<u>Bombus terrestris</u> : Buff-tailed Bumblebee	2
27	<u>Brachytron pratense</u> : Hairy Dragonfly	2
28	<u>Bupalus piniaria</u> : Bordered White	1
29	<u>Callophrys rubi</u> : Green Hairstreak	11
30	<u>Caloptilia rufipennella</u> : Small Red Slender	1
31	<u>Camptogramma bilineata</u> : Yellow Shell	1
32	<u>Celastrina argiolus</u> : Holly Blue	32
33	<u>Celypha lacunana</u> : Common Marble	1
34	<u>Chrysolina americana</u> : Rosemary Beetle	1
35	<u>Cicindela campestris</u> : Green Tiger Beetle	1
36	<u>Coccinella septempunctata</u> : 7-spot Ladybird	9
37	<u>Cochylis nana</u> : Birch Conch	1
38	<u>Coenagrion puella</u> : Azure Damselfly	7
39	<u>Coenonympha pamphilus</u> : Small Heath	10
40	<u>Coleophora serratella</u> : Common Case-bearer	1
41	<u>Coleophora spinella</u> : Apple and Plum Case-bearer	1
42	<u>Colias croceus</u> : Clouded Yellow	5
43	<u>Colletes hederæ</u> : Ivy Bee	3
44	<u>Crocallis elinguaris</u> : Scalloped Oak	2
45	<u>Cteniopus sulphureus</u> : Sulphur Beetle	1
46	<u>Cydia ulicetana</u> : Grey Gorse Piercer	1
47	<u>Diaperis boleti</u>	1
48	<u>Ectoedemia sericopeza</u> : Norway-maple Pigmy	1

49	<u>Enallagma cyathigerum</u> : Common Blue Damselfly	3
50	<u>Epinotia bilunana</u> : Crescent Bell	1
51	<u>Eriocrania sangii</u> : Large Birch Purple	1
52	<u>Eriocrania semipurpurella</u> : Early Purple	1
53	<u>Eriocrania unimaculella</u> : White-spot Purple	1
54	<u>Eupithecia pulchellata</u> : Foxglove Pug	1
55	<u>Euproctis similis</u> : Yellow-tail	2
56	<u>Eupsilia transversa</u> : Satellite	2
57	<u>Euroleon nostras</u>	3
58	<u>Favonius quercus</u> : Purple Hairstreak	6
59	<u>Gonepteryx rhamni</u> : Brimstone	19
60	<u>Gracillaria syringella</u> : Common Slender	1
61	<u>Harmonia axyridis</u> : Harlequin Ladybird	5
62	<u>Harpalus rufipalpis</u>	1
63	<u>Hemaris fuciformis</u> : Broad-bordered Bee Hawk-moth	3
64	<u>Hipparchia semele</u> : Grayling	17
65	<u>Hypera dauci</u>	1
66	<u>Idea subsericeata</u> : Satin Wave	1
67	<u>Incurvaria pectinea</u> : Pale Feathered Bright	1
68	<u>Ischnura elegans</u> : Blue-tailed Damselfly	1
69	<u>Korscheltellus lupulina</u> : Common Swift	2
70	<u>Lacanobia suasa</u> : Dog's Tooth	2
71	<u>Lampyris noctiluca</u> : Glow-worm	15
72	<u>Lasiommata megera</u> : Wall	5
73	<u>Lestes sponsa</u> : Emerald Damselfly	2
74	<u>Libellula depressa</u> : Broad-bodied Chaser	2

75	<u>Libellula quadrimaculata</u> : Four-spotted Chaser	5
76	<u>Lycaena phlaeas</u> : Small Copper	42
77	<u>Lycophotia porphyrea</u> : True Lover's Knot	1
78	<u>Macroglossum stellatarum</u> : Humming-bird Hawk-moth	4
79	<u>Macrothylacia rubi</u> : Fox Moth	1
80	<u>Maniola jurtina</u> : Meadow Brown	82
81	<u>Mecinus circulatus</u>	1
82	<u>Melanchra persicariae</u> : Dot Moth	2
83	<u>Meloe proscarabaeus</u> : Black Oil-beetle	1
84	<u>Mythimna turca</u> : Double-line	1
85	<u>Nemapogon cloacella</u> : Cork Moth	1
86	<u>Noctua orbona</u> : Lunar Yellow Underwing	3
87	<u>Noctua pronuba</u> : Large Yellow Underwing	4
88	<u>Ochlodes sylvanus</u> : Large Skipper	8
89	<u>Odontoscelis (Odontoscelis) lineola</u>	1
90	<u>Omphaloscelis lunosa</u> : Lunar Underwing	1
91	<u>Orgyia antiqua</u> : Vapourer	2
92	<u>Orthetrum cancellatum</u> : Black-tailed Skimmer	14
93	<u>Pararge aegeria</u> : Speckled Wood	14 6
94	<u>Perconia strigillaria</u> : Grass Wave	1
95	<u>Petrophora chlorosata</u> : Brown Silver-line	1
96	<u>Phasia hemiptera</u>	1
97	<u>Pholidoptera griseoptera</u> : Dark Bush-cricket	2
98	<u>Phyllonorycter joannisi</u> : White-bodied Midget	1

99	<u>Pieris brassicae</u> : Large White	10 5
100	<u>Pieris napi</u> : Green-veined White	12 1
101	<u>Pieris rapae</u> : Small White	42
102	<u>Platyptilia calodactyla</u> : Golden-rod Plume	1
103	<u>Plebejus argus</u> : Silver-studded Blue	1
104	<u>Polygonia c-album</u> : Comma	10 2
105	<u>Polyommatus icarus</u> : Common Blue	19
106	<u>Psyche casta</u> : Common Sweep	1
107	<u>Pterophorus pentadactyla</u> : White Plume Moth	2
108	<u>Pyronia tithonus</u> : Gatekeeper	62
109	<u>Pyrrhosoma nymphula</u> : Large Red Damselfly	25
110	<u>Rusina ferruginea</u> : Brown Rustic	1
111	<u>Sargus bipunctatus</u> : Twin-spot Centurion	4
112	<u>Sargus flavipes</u> : Yellow-legged Centurion	1
113	<u>Satyrium w-album</u> : White-letter Hairstreak	6
114	<u>Scoparia ambigualis</u> : Common Grey	1
115	<u>Spilosoma lubricipeda</u> : White Ermine	2
116	<u>Spilosoma lutea</u> : Buff Ermine	3
117	<u>Stigmella anomalella</u> : Rose Leaf Miner	1
118	<u>Stigmella tiliae</u> : Lime Pigmy	1
119	<u>Stomorhina lunata</u> : Locust Blowfly	1
120	<u>Stratiomys potamida</u> : Banded General	2
121	<u>Subcoccinella vigintiquatuorpunctata</u> : 24-spot Lady-bird	1

122	<u>Sympetrum sanguineum</u> : Ruddy Darter	7
123	<u>Sympetrum striolatum</u> : Common Darter	30
124	<u>Tachina fera</u>	6
125	<u>Thalpophila matura</u> : Straw Underwing	1
126	<u>Thymelicus lineola</u> : Essex Skipper	8
127	<u>Thymelicus sylvestris</u> : Small Skipper	11
128	<u>Triodia sylvina</u> : Orange Swift	2
129	<u>Tychius quinquepunctatus</u>	1
130	<u>Tyria jacobaeae</u> : Cinnabar	3
131	<u>Vanessa atalanta</u> : Red Admiral	10 9
132	<u>Vanessa cardui</u> : Painted Lady	34
133	<u>Xanthorhoe fluctuata</u> : Garden Carpet	2
134	<u>Xestia xanthographa</u> : Square spot Rustic	2

The BLS Lichen database records 45 lichens in the wood at the bisection / pinchpoint including some rare and threatened species like *Lecanora expallens*.²

Conclusion

Records based on observation are opportunistic and reflect the availability of knowledgeable folk, often at leisure. The number and variety of rare species recorded in this small area is therefore remarkable.

² <https://registry.nbnatlas.org/public/show/dr959>

It reflects the unperturbed landscape, with a variety of plant life, food for pollinators, and a range of habitats, from rotting logs to muddy banks, from grassland to wilderness, from water to dung. It is unlit by anything other than domestic lighting, so still offers dark skies. It also reflects the vital function of the river, which nourishes plants and bugs to feed the entire food chain.

It is an ecological disaster to pick this precise point to dam the river, fell the woodland by it on both sides of the B1122, dig out significant fraction of the earth in this selected 1000m circle of recorded wildlife, and eliminate the night skies. The river will also carry the inevitable pollution from engines, digging, disturbance of the water table, noxious building processes and materials downstream, along the river banks and into North Warren, Thorpeness Mere, the coastal marshland, and beyond.

From: Mary Shipman [REDACTED]
Sent: 13 October 2021 11:35
To: Enquiry Unit <Enquiries@beis.gov.uk>
Cc: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk> [REDACTED]
[REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk> **Subject:**
Scottish Power Renewables EA1N & EA2 - URGENT REPRESENTATIONS

Dear Ministers

We are aware that the report and recommendation of the Examining Authority, in relation to the applications for Development Consent Orders for these two projects, will now be with BEIS for review and decision.

What has become abundantly clear in recent months is that these applications are a subterfuge by National Grid to establish a new major energy hub close to the medieval village of Friston and the Suffolk Heritage Coast. National Grid Ventures are now in a Non-Statutory Consultation Phase with their Nautilus Interconnector project, which is also planned to connect at Friston, if the SPR projects are consented. In a webinar yesterday evening Martin Moran of NGV admitted that these consultations were costing millions and were being funded by National Grid itself, rather than National Grid Ventures which is allegedly an independent entity.

National Grid declined to appear during the Examination into the SPR projects, despite requests from the Examining Authority. This prevented proper examination of the proposed National Grid substation (and its likely extensions) and of the cumulative effects of other projects which are planned (or in the pipeline) to connect at Friston. These include:-

- NGV Nautilus
- NGV Eurolink (only approximately 6 months behind Nautilus in consultation)
- RWE Five Estuaries
- RWE North Falls (although the current RWE projects are currently consulting on landfall in Tendring, the connection offer by NG could easily change to Friston)
- NG SCDC1 (now named Sealink) and potentially SCDC2

You will also be aware that the Examination into Sizewell C is closing on 14 October. This beautiful part of Suffolk is now threatened by a welter of energy projects in an area where they are not sustainable. This will devastate the important tourist industry on the Suffolk Coast, which Nigel Huddleston, the Minister for Tourism, has very recently visited and shatter the lives of so many people who have chosen this beautiful and tranquil area as their home.

We fully support Therese Coffey's proposal that a brownfield site, such as Bradwell, would provide a much more appropriate location for such a large industrial complex. Development at Friston will cause serious harm to the AONB through its landfall at Thorpeness and cable route through many designated sites, as well as a significant permanent loss of Best and Most Versatile Agricultural Land at Friston itself.

On a personal level, as residents of Friston we live with the constant threat of flooding, which has increased alarmingly since 2015. Our house is very close to the Friston Watercourse (where SPR and NG propose to discharge their surface water) and we have been flooded on two occasions during the past week alone. SPR's decision to discharge into the watercourse was made after several attempts at infiltration testing, which were not compliant with BRE365 standards. Given the existing flood risk in Friston, it is totally unacceptable that the risk to the village of increased flooding should even be considered.

The right course of action would be for National Grid to be open and honest about its future developments and make one DCO application to include all projects with a likelihood on connecting to its new substation and for this to be re-considered in a more suitable location, such as Bradwell or another brownfield or developed site such as Bramford, where SPR were originally offered a connection for these projects.

Kind regards

Ian & Mary Shipman

[REDACTED]
[REDACTED]
[REDACTED]

From: Janet Dolan [REDACTED]
Sent: 16 October 2021 11:06
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk; [REDACTED]
Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;
[REDACTED]
Subject: MASS ENERGY INDUSTRIALISATION PLANNED FOR SUFFOLK COAST & HEATHS

Dear Secretary of State

I am writing to you regarding the above.

I ask that when considering this matter you reach a SPLIT DECISION so that 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 industrialised site.

Yours sincerely

Janet and Michael Dolan

A large black rectangular redaction box covering the signature area.

Sent from my iPad

From: Neil Woodfield [REDACTED]
Sent: 16 October 2021 21:51
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Attached. Rt. Hon leasing kwarteng MP

Good afternoon,

We are shocked to hear that yet another site has been proposed for the area of Suffolk coast and heathland where there is no road infrastructure to support it.

It will be a complete eyesore as there is no other buildings around the proposed site at the moment. Absolutely needless destruction to a currently unspoilt protected rural area which is rich in wildlife and has an important nature based tourism economy.

Please can you consider building it somewhere else or not building it at all.

Thank you

Josie Woodfield

Sent from my Galaxy

From: [REDACTED]

Sent: 17 October 2021 15:01

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED]

Offshore Coordination <offshore.coordination@beis.gov.uk>

Subject: Scottish Power Renewables / East Anglia

Dear Secretary of State

Having recently received literature from Nautilus and visited the public event concerning their proposed Interconnector site at Friston, it brought home the size of their construction on top of the enormous onshore substation proposed by Scottish Power, EA1N and EA2.

With the continued loss of natural habitat in our area due to residential house construction

I consider these proposals in areas currently unspoilt and rich in wildlife to be counter to commitments to protect our areas of natural beauty and request they be rejected and thus giving an opportunity to choose a more suitable location not having the impact these do.

Thanking you for your considerations

Richard Evans



Sent from my Galaxy

From: Ian Henderson [REDACTED]

Sent: 17 October 2021 12:57

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED]

Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

[REDACTED]
info@suffolkenergyactionsolutions.co.uk; info@saveoursandlings.org.uk; 'Dear Sir'

<saveeastsuffolk@outlook.com>

Subject: Mass Energy Industrialisation Planned for Suffolk Coast and Heaths

Dear Sir

I am a geography graduate and a resident of Aldeburgh. When I came to live here [REDACTED], I accepted the massive hulk on the horizon, visible from my garden, of the Sizewell A Power Station and also the rather beautiful dome of Sizewell B.

Little did I realise that the presence of the power lines, linking the power station to the National Grid, becomes the convenient reason for creating the UK's new energy hub in the heart of the unspoilt Suffolk Coast and heathlands. As a result of my geographical knowledge backed up by a career in the investment business, I can see the economic logic and convenience of bringing ashore North Sea electricity at the nearest point. What has horrified me in recent days, as a result of the recently published proposals announced by Nautilus, is the realisation that by allowing the building of the sub-station at Friston, hard on the heels of this will come not one but many other companies wanting to use this route to interconnect the national grid with other European countries' power supplies which will lead to the industrialisation of this part of Suffolk. Not only will this cause logistical chaos due to the poor road and rail facilities, it will be ecologically disastrous and economically harmful to the leisure and tourist industries.

I trust that you will make your decision on the EA1N and EA2 applications in the knowledge that the destruction of the countryside in this part of England does not have to happen. While recommending the offshore turbines should go ahead, you will reject the onshore infrastructure in favour of better locations where the adverse impacts are minimised at either a brownfield or an already industrialised site. Yours faithfully

Ian Henderson

[REDACTED]

From: Rosemary Kersey [REDACTED]
Sent: Sunday, October 17, 2021 2:14:10 PM
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED] Hands, Greg (BEIS)
[REDACTED]; info@nautilusinterconnector.com
<info@nautilusinterconnector.com>; [REDACTED]
[REDACTED]; Hands, Minister (BEIS)
Offshore Coordination <offshore.coordination@beis.gov.uk>;
[REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

I wholeheartedly support the future goals to achieve a more sustainable energy supply and reliability on renewable energy sources. East Anglia will play a significant role in supporting this transition.

During the examinations it is clear that the adverse impacts of these projects far outweigh the benefits of the onshore infrastructure.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) in the midst of one of the UK's most fragile nature based tourism destinations, will lead to:

- damaging tourism, a large part of the local employment and economy
- knock on effect of damaging local economy and coastal communities
- huge cumulative effect from other energy projects
- unsuitable landfall site at the fragile Thorpeness cliffs
- vast areas of habitat disturbance and loss along the cable route and onshore development area
- noise and visual pollution including increased traffic
- threat to wildlife including bats, badgers, owls, nightingales, skylarks and many migratory bird species

- amenity land losses including the temporary and permanent closure of 26
PRoW

A split decision gives the government an opportunity to fully evaluate the cumulative impact of ALL energy proposals including future ones in the developmental stage. Also the split decision would allow other more suitable sites to be looked at such as brownfield sites or pre-industrialised sites which has the capacity to act as a energy hub that will minimise damage to greenfield sites. I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach.

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud of.

There is time. Please recommend a 'split decision'.

Yours faithfully

Rosemary Kersey

A black rectangular redaction box covering the signature area, consisting of three stacked rectangular blocks of varying widths.

From: Lorraine Anderson [REDACTED]

Sent: 18 October 2021 13:41

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

Subject: Scottish Power 'EA1N & EA2' Wind Farms and now National Grid's 'Nautilus' Interconnector

To the Secretary of State BEIS,

Re: Scottish Power 'EA1N & EA2' Wind Farms and now National Grid's 'Nautilus' Interconnector

I write with my concerns regarding offshore wind powered energy on the Suffolk coastline

I am in agreement with offshore turbines been constructed and would therefore recommend them for consent.

However, regarding grid connection I do not agree and would reject this.

To connect to the grid at a brownfield/industrial site may be considered more expensive. These projects are not just for our immediate concerns but for the future. Our countryside should also be protected for the future and should be considered side by side not torn apart by destruction of the countryside which is just as important for climate change as energy renewables.

I write to ask you to give a split decision on EA1N and EA2 and take them and future grid connections to a brownfield/industrial site closer to where the power is needed. The Technology is now available to do so.

Yours

L Anderson

|

From: Patricia Dorcey [REDACTED]
Sent: 18 October 2021 15:05
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Saving communities

Dear Kwasi Kwarteng

Please consider a split decision when looking at SPRs proposals for Suffolk.

The DCO has been submitted and the final decision lies with you

LOADS more projects are planned and even now Nautilus is consulting with the local occupants of the area . By allowing the offshore plans to proceed but not the onshore buys time for the area and the people who otherwise will be so impacted if a solution is not found.

Destruction onshore cannot be mitigated.

So much habitat will be lost which could be avoided if brownfield sites were used for the onshore element of wind power.

This area is also very reliant on tourism which is vital for the economy and is under huge threat of job loss due to the impending developments which will only produce short term employment during the build.

Regards

Mrs P Dorcey and Mr S Dorcey
residents

19 October 2020

By Email and by Post

Rt Hon Kwasi Kwarteng MP
Secretary of State for Business Energy and Industrial Strategy
1 Victoria Street
London
SW1H 0ET

Email: enquiries@beis.gov.uk

Dear Secretary of State

SCOTTISH POWER & NATIONAL GRID – EA1N AND EA2 OFFSHORE WINDFARMS AND RELATED ONSHORE TRANSMISSION INFRASTRUCTURE

I am writing on behalf of SASES, a community group which was set up by a number of residents in and around the mediaeval village of Friston in Suffolk, to challenge the onshore but not the offshore elements of these projects.

SASES was an interested party in the examinations for each of these projects and participated extensively in the examination process concerning the onshore elements of these projects, being represented by counsel with the support of a number of experts.

As the Secretary of State is no doubt aware the examinations concluded on 6 July 2021 and the Examining Authorities' reports were delivered to the Secretary of State on 6 October 2021.

Since the examinations concluded on 6 July certain facts and circumstances have changed which SASES submits should be considered by the Secretary of State in determining whether or not development consent should be granted for these projects. Those facts and circumstances relate to the following matters.

1. Cumulative Impact – consultation has commenced and or is anticipated to commence in respect of other offshore energy projects which will or which are likely to seek to connect to the proposed National Grid connection hub at Friston should the Scottish Power projects obtain development consent, necessitating further development onshore at Friston and between Friston and the coast at Sizewell alongside the proposed Sizewell C development.
2. The BEIS Offshore Transmission Network Review – work has continued on this review which clearly indicates that these projects should be brought forward in a different form as Pathfinder projects.
3. The publication in September 2021 of drafts of new National Policy Statements concerning energy infrastructure

On a related point we are aware of the complaints made by Suffolk Energy Action Solutions (SEAS) concerning the use by Scottish Power of nondisclosure and other provisions in arrangements with landowners whose purpose is, and whose effect will have been, to prevent those landowners from participating in the examination processes for these projects. We are aware of these complaints and share SEAS' concerns and reserve our rights in respect of such matters.

1. Cumulative Impact

- 1.1. As well as the offshore generating stations, cable connections and project substations, these projects seek development consent for a new National Grid substation at Friston which would be able to serve as a "connection hub". The question of other projects connecting to the proposed National Grid connection hub at Friston and their potential cumulative impact was inadequately addressed during the examinations. Scottish Power despite prompting from the Examining Authorities in relation to two of those other projects (National Grid Ventures' Nautilus and Eurolink projects) failed to conduct such an assessment. Instead it engaged in a cursory exercise merely in respect of the proposed extension of the National Grid connection hub to serve the Nautilus and Eurolink projects.
- 1.2. Since the close of examinations the prospect of other offshore projects connecting at Friston has become more of a reality. NGV commenced its public consultation in respect of its Nautilus interconnector projects in the week commencing 27 September 2021. The latest information published by NGV in respect those projects are set out at this link

[REDACTED]

- 1.3. This demonstrates that there will be significant cumulative effects between the Scottish Power projects and the Nautilus project. Further in the course of meetings with representatives of NGV, NGV advised that:

- 1.3.1. the public consultation in respect of the NGV Eurolink project which has the same grid connection offer as Nautilus, and therefore can be expected to be Friston, will commence in September 2022; and

- 1.3.2. the public consultation in respect of NGET's/NGESO's Suffolk to Kent interconnector (initially referred to as SCD1 and now with the project name Sealink) is expected to commence in the second quarter of 2022. This interconnector will also connect in the Sizewell/Leiston area, which to date has been interpreted to mean Friston.

- 1.4. It should also be noted that the location of the onshore connection of the offshore windfarm projects known as North Falls and Five Estuaries is far from certain as evidenced by meeting minutes on the Planning Inspectorate websites for these projects. It is a matter of some doubt as to whether connection offers have been made at all, as National Grid has refused to disclose the relevant CION assessments despite a request having been made under the Environmental Information Regulations. Given this lack of certainty and given the need and desirability for offshore projects to coordinate their onshore connections, which has increased since the close of the examinations (see further below), it seems manifestly reasonable to conclude that should the National Grid connection hub at Friston be consented

as part of the Scottish Power projects then, whatever the existing connection position might be, a connection offer for those windfarms will be made at Friston.

- 1.5. Accordingly, given the current consultation in respect of NGV's Nautilus project, the proposed consultations in respect of NGV's Eurolink project and NGET's/NGESO's Sealink project plus the very real prospect that the Five Estuaries and North Falls projects will connect at Friston should the Scottish Power projects be consented, the failure by Scottish Power to carry out a cumulative impact assessment in respect of these projects becomes ever more unsustainable.
- 1.6. A serious aggravating factor is the fact that all these projects will take place in the same area as and in similar timeframes to Sizewell C, with some elements of these projects being constructed alongside the nuclear site. It must be questionable whether it is prudent to consent projects which will facilitate the development of a series of further major projects in the same area at the same time as such a major and overridingly important project as Sizewell C.
- 1.7. Of course many of these problems could have been avoided had National Grid transparently promoted the proposed National Grid connection hub (which is an NSIP in its own right) at Friston itself. Such an approach would properly reflect that the connection hub is not just a development to serve Scottish Power's EA1N and EA2 projects, but a strategic location to support the needs of a number of offshore projects with site selection and environmental assessments being conducted to reflect the substance of this project. Such an approach may also have had the advantage of enabling National Grid to comply with its obligations under the Electricity Act 1989.

2. The BEIS Offshore Transmission Network Review - Recent Progress

- 2.1. The launch by BEIS of the Offshore Transmission Network Review was welcomed recognising as it did the concern by many stakeholders that the future development of offshore wind was being and would continue to be hampered by the lack of coordination and investment in the onshore connection and transmission.

- 2.2. On 14 July 2021 Ofgem and BEIS published a joint open letter which stated

*"We believe that the mechanisms we have highlighted in the consultation and which we intend to put in place through the Early Opportunities workstream would allow developers to be more ambitious and expand on their proposed levels of coordination. **We would strongly encourage developers to proactively consider opportunities for coordination with others in the same region where they have not already done so.**" [emphasis added]*

- 2.3. Despite the Scottish Power projects clearly falling within the work stream known as "early opportunities", and despite the encouragement given by BEIS and Ofgem to developers to "opt in" Scottish Power has declined to do so. The fact that Iberdrola is considering hiving off Scottish Power to realise its value¹, and every consented project enhances that value, may

¹ Iberdrola examines spinning off its offshore wind business – Financial Times 21 July 2021

not be unconnected with Scottish Power's/Iberdrola's refusal to opt in to "early opportunities" for coordination.

- 2.4. It is a curious feature of the Scottish Power's projects EA1N and EA2 that they were originally coordinated in terms of their onshore connection with a Scottish Power's EA1 and EA3 projects which connect (or in the case of EA3, which has yet to commence construction, will connect) at an existing National Grid substation/connection hub at Bramford, north of Ipswich. So rather than these projects being uncoordinated from the outset they were in fact coordinated and then became uncoordinated. The reasons for this have never been adequately explained not least by National Grid and are at odds with its obligations under the Electricity Act 1989. Certainly the consequences of this change do not appear to have been fully explained to BEIS, the Planning Inspectorate or the relevant local authorities.
- 2.5. Given the terms of reference of the OTNR, the identification of an early opportunities work stream and the recent strong encouragement by Ofgem and BEIS for developers to "opt in", it would seem inconsistent for the Secretary of State to grant consent for projects which represent a classic example of the very lack of coordination and unnecessary environmental damage which prompted the OTNR.

3. New National Policy Statements Concerning Energy Infrastructure

The Need for Coordination

- 3.1. As the Secretary of State is no doubt aware many complaints have been made about the projects and their lack of coordination in respect of the onshore infrastructure. As mentioned above this is particularly acute given these projects were originally coordinated with EA1 and EA3.
- 3.2. The existing policy statements for energy infrastructure are 10 years old dating back to 2011 at a time when the importance of the need for coordination was not recognised. In September 2021 drafts of the proposed new national policy statements were published. Those relevant to these projects are EN-1, EN-3 and EN-5. Those drafts all address the need for coordination and the avoidance of a series of radial connections.
- 3.3. Whilst these projects primarily fall to be considered under the existing NPSs those policies did not address the need for coordination. In this context paragraph 1.6.3 of the draft of EN-1 is particularly relevant.

1.6.3 - However, any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application.

As the existing NPSs do not address the need for coordination it is submitted that the Secretary of State should consider that the provisions of the draft NPS relating to coordination are relevant including the following paragraphs/extracts.

EN-1

3.3.51 - *it is expected that for regions with multiple windfarms a more coordinated approach will be adopted wherever possible.*

3.3.53 - *a more integrated approach to offshore transmission, which included efficient planning of the onshore network, **could deliver consumer benefits of up to £6bn by 2050** [emphasis added]*

3.3.57 - *in light of the potential for unwarranted and avoidable disruption, inefficiency, and visual blight along the onshore - offshore boundary, where possible the preference should be for coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits.*

EN-3

2.22.15 - *it is expected that a more co-ordinated approach to transmission from multiple offshore windfarms to onshore networks will be adopted, compared with a radial connection approach*

EN-5

2.2.5 *As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), developers will be influenced by Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest”*

2.5.2 *Footnote 7 - The transition to more co-ordinated transmission is led by two temporal workstreams under the Offshore Transmission Network Review (OTNR). Co-ordinated transmission projects are being brought forward as pathfinders as part of the ‘early opportunities’ workstream.*

2.5.5 *Radial offshore transmission options to single windfarms should only be proposed where these can be demonstrated to be the only feasible solution and a co-ordinated solution is not possible. In these instances, the Secretary of State should have regard to the need case set out in Section 3.3 of EN-1.*

3.4. In this context the Secretary of State may be interested to learn that Scottish Power has yet to commence construction of its EA3 windfarm which has being consented on the basis it will connect to the existing National Grid substation site at Bramford, the original connection point for EA1N and EA2. Furthermore Iberdrola is promoting EA1N, EA2 as part of a combined project with EA3 – see link below.

[REDACTED]

3.5. Given,

- the original coordination onshore of EA1N and EA2 with EA1 and EA3;

- the recent strong encouragement from Ofgem and BEIS to developers to come forward and “opt in” with Pathfinder projects/early opportunities as part of the OTNR;
- the £6bn of savings that can be derived from greater coordination;
- the terms the new draft NPSs in respect of the importance of coordination;
- the fact that EA3 has yet to commence construction,

the arguments to consent the offshore elements of these proposals but to refuse the onshore elements to allow a properly coordinated approach are very powerful. Accordingly the Secretary of State should either only consent the offshore elements or refuse consent in respect of the entirety of the projects with the recommendation that EA1N and EA2 are brought forward with EA3 as a Pathfinder project with a coordinated single connection point at Bramford as originally intended.

Flood risk & climate change

- 3.6. Flood risk is a key issue in assessing whether the site at Friston is suitable for large-scale electrical infrastructure. As submitted by SASES in the examinations, Scottish Power selected the site at Friston without considering the high surface water flood risk at the site and therefore did not consider all sources of flooding at the site. Further Scottish Power did not consider surface water flooding in applying the Sequential Test in respect of its site selection despite the National Planning Policy Framework, which post dates the 2011 NPS EN-1, highlighting the need for all sources of flooding to be considered. This is a significant breach of policy. Alternative sites with a lower risk of flooding exist.
- 3.7. Since 2011 the effects of climate change have become ever more apparent with increasing extreme weather events including very heavy rainfall. The new draft EN-1 appears to reflect this and, consistently with the National Planning Policy Framework, clarifies the need for all sources of flooding to be considered – see extract below.

The Sequential Test

*5.8.15 Preference should be given to locating projects in areas of lowest flood risk. The Secretary of State should not consent development in flood risk areas (Flood Zone 2 in England or Zone B in Wales), **accounting for all sources of flooding** [emphasis added] and the predicted impacts of climate change unless they are satisfied that the sequential test requirements have been met. The Secretary of State should not consent development in Flood Zone 3 or Zone C unless they are satisfied that the Sequential and Exception Test requirements have been met.*

- 3.8. Shortly after the end of the examinations exceptionally heavy rainfall in northern Europe resulted in catastrophic flooding with many lives lost. What happened in northern Europe could happen in the East of England.
- 3.9. Again the provisions of paragraph 1.6.3 of the draft EN-1 appear to be particularly relevant. Therefore given the ever increasing effects of climate change causing extreme weather

events, the Secretary of State should not consent projects where the Sequential Test in respect of all sources of flooding has not been applied.

- 3.10. In the draft DCOs National Grid has reserved the right to use gas insulated switchgear rather than air insulated switchgear despite the fact that gas insulated switchgear utilises SF6. Again this is a point addressed in the new NPSs – extract below.

The Use of SF6

2.14.2 The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments. Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.

- 3.11. Given that there is an SF6-free alternative in the use of air insulated switchgear National Grid should not have the ability under the DCOs to develop the National Grid connection hub at Friston using gas insulated switchgear which employs SF6.

We respectfully request that you take into account the important matters set out above when considering the Examining Authorities' reports.

Yours sincerely

Michael Mahony

cc

Rt Hon Greg Hands MP - enquiries@beis.gov.uk

Rt Hon Therese Coffey MP - [REDACTED]

From: Liz [REDACTED]
Sent: 20 October 2021 13:06
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; [REDACTED]
Subject: Fwd: Mass Energy Industrialisation Planned for Suffolk Coast and Heaths

Sent from my iPad

Begin forwarded message:

From: Liz [REDACTED]
Date: 20 October 2021 at 13:00:43 BST
To: secretary.state@beis.gov.uk
Cc: minister.state@beis.gov.uk, [REDACTED],
[REDACTED], offshore.coordination@beis.gov.uk,
info@nautilusinterconnector.com, [REDACTED]
[REDACTED]
Subject: Mass Energy Industrialisation Planned for Suffolk Coast and Heaths

The Rt Hon Keadı Kwarteng MP

I write to register my most STRONGEST OBJECTION to the horrific proposed plans for the Nautilus Interconnector and any other associated future projects and ask that you recommend a split decision so that the offshore turbines are recommended for consent and the onshore infrastructure is REJECTED.

I fail to see why the proposed area of an unspoilt rural area which is rich in wildlife and is an important nature-based tourist economy has been chosen for the devastation and destruction over a brownfield or industrial site.

Yours sincerely

Elisabeth Jarrett
Snape
Suffolk

Sent from my iPad

From: Maggie Knight [REDACTED]
Received: Wed Oct 20 2021 16:26:29 GMT+0100 (British Summer Time)
To: HANDS, Greg [REDACTED];
Cc: Enquiry Unit <enquiries@beis.gov.uk>; Enquiries @ BEIS <enquiries@beis.gov.uk>;
Subject: Scottish Power Renewables - EA1N & EA2 - Rt Hon Greg Hands - BEIS

The Rt Hon Greg Hands
BEIS

Dear Rt Hon Greg Hands,

Scottish Power Renewables - EA1N and EA2 – Windfarms

I am aware that the final report by the Planning Inspectorate for the above projects has been issued to you as BEIS Minister responsible for making the final decision regarding the application of SPR for two windfarms on the Suffolk coast.

Whilst I am in favour of green energy and the offshore wind farms, I wish to express my deep concern over the onshore element of these projects which seeks to construct a substation on 30 acres of prime agricultural land immediately on the edge of the historic village of Friston and a cable corridor the size of an eight-lane motorway from Thorpeness through an area of outstanding natural beauty to Friston. In total an area of 500 acres would become industrial landscape taking away valuable agricultural land.

This proposed project is a 'trojan horse' and if approval is given there are plans for FIVE interconnectors listed below to link up to this substation, each with its own cable route and in the case of Nautilus would be 50m wide. The cumulative impact of this would devastate the whole area.

- Nautilus and Eurolink onshore convertor stations [NGV]
- UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
- Five Estuaries [RWE] – proposed offshore windfarm extension
- North Falls [RWE] - proposed offshore windfarm extension.

In addition, there is the impact of Sizewell C if it goes ahead adding to the cumulative impact of industrialisation to the entire Suffolk Coastal region.

The damage to the economy because of industrialisation will be catastrophic. Tourism forms a large part of the economy and provides significant employment in this area. Tourists come for the peace and tranquillity, wildlife and natural environment and would not visit if the landscape is transformed into an industrial wasteland – a blot on the landscape for future generations who will not thank the Conservative Government for the effects of such destruction. Furthermore, this area has narrow roads and lanes and would not be able to take HGV traffic for these projects not to mention the pollution of heavy construction traffic over the eight-to-tenyear period of construction.

Instead of destroying green field sites, a brownfield site must be found for this project such as Bradwell on the coast and away from communities. The Rt. Hon. Dr. Therese Coffey has helped to set up a new Offshore Electricity Grid Task Force (OffSET) consisting of East Anglian MPs and local councillors who support this approach and to scrutinise any plans which are damaging to the environment. Dr Coffey supports the use of the existing industrial site at Bradwell along with a split decision to approve the offshore element on its own.

It has been suggested many times in the Planning Inspectorate hearings a split decision is required to approve the offshore element and to reject the onshore industrialisation of a large swathe of rural Suffolk countryside including its wetlands and the devastation to the historic village of Friston.

In summary, SPR failed to evaluate the cumulative impact of the projects listed above and therefore failed in their duty to bring all future project proposals to the attention of the Planning Inspectorate and the entirety of the cumulative impact to this region over the next 10-12 years. SPR failed in its duty in the DCO process which means the onshore element must be rejected, if not the entire project.

Yours sincerely,

Ms Margaret Knight

From: John Lepley [REDACTED]

Sent: 21 October 2021 15:49

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED] COFFEY, Therese

[REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; martin.moran@nationalgrid.com; [REDACTED]

Subject: Applications EA1N and EA2

Dear Secretary of State,

I am writing to request that you support a split decision in relation to the above applications, which will have a dramatic effect on the community of Leiston and the surrounding countryside.

I completely support the principle of offshore wind power, as part of the UK strategy to combat climate change.

However, I am seriously concerned that the proposed onshore infrastructure will do incredible damage to the unique Suffolk Sandlings habitat. I am far from convinced that the proposed infrastructure has been properly thought through, particularly the integration between the three projects currently impacting the Leiston area, namely Sizewell C, Scottish Power (Friston Substation) and most recently, the National Grid, Nautilus Interconnector.

It would make much more sense to thoroughly investigate suitable brownfield or industrial sites for the proposed infrastructure, and / or a coastal "ring main" system, which would minimise damage to the environment potentially caused by multiple cable trenches cutting across coastal land across the whole of the East of the UK.

In view of the above I am requesting that you:

1. Recommend the proposed offshore turbines for consent, thus ensuring that no time is wasted in respect of the construction of the turbines.
2. Reject the proposed onshore infrastructure, in favour of full consideration of better locations for this infrastructure, where the adverse impact can be minimised at a brownfield or industrialised site.

I am grateful to our local MP, The Right Hon Dr Therese Coffey, who has been championing the above suggested split decision.

With Kind regards,

John Lepley
[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]

Sent: 26 October 2021 12:09

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk; box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy. The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#). This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard. There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully,
Carole Filby

Sent from my iPhone

From: sarah.prior [REDACTED]
Sent: Thursday, October 21, 2021 9:13:30 PM
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Greg (BEIS) [REDACTED];
[REDACTED];
Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com
<info@nautilusinterconnector.com>; [REDACTED]
[REDACTED]
Subject: National Grid Nautilus Interconnector proposal

To: Rt Hon Kwasi Kwarteng BEIS

CC:

Rt Hon Greg Hands
Rt Hon Michael Gove
Rt Hon Therese Coffey
BEIS Offshore Review
Nautilus Project Team
Suffolk Council

Dear Mr Kwarteng,

I wrote to you in May this year with respect to the Scottish Power East Anglia 1 and 2 proposal. It is with a heavy heart that I am now writing to you again, this time with respect to the National Grid (NG) Nautilus Interconnector proposal.

The leaflet sent out by NG features a lovely picture of a happy family on the beach on the front. In the future that picture would feature as their backdrop, not the beautiful Suffolk countryside, but the Sizewell C structure, the EA1 and 2 substations and then to cap it all a 25metre high building the size of a football pitch in the middle of pristine farmland. That picture would have been more honest by NG.

Various detailed concerns are set out below, but in general I would observe that we all accept the need for green energy sources, however, what we have with all of these proposals is horrendously uncoordinated. In addition once this is all started I cannot believe there won't be more of the same.

After a long career in finance I recognise that there are cost implications of a more coordinated and shared approach between different organisations. However, a failure to adopt such an approach may indeed shave something off the cost for the wider population of energy consumers in the future, BUT it does so by externalising a very significant and long lasting cost, in respect of the environment and quality of life, onto the residents and businesses of Suffolk coastal.

Not so long ago utility companies were forced to coordinate their activities digging up roads to prevent disruption to road users and damage to the infrastructure. In a similar vein a failure now to manage these various large scale proposals in a well planned,

coordinated and environmentally sensitive way will result in the whole county of Suffolk looking like a badly damaged and patch-worked swathe of concrete.

I realise that right now with the issue of gas supply and prices the Government will be under huge pressure but I would press for a considered approach, not a lowest common denominator one.

More detailed comments:

- Suffolk coastal communities are being subjected to yet another consultation for NGVs Nautilus Interconnector following Scottish Power's EA1N and EA2 and EDF's SZC. All this is too much for one small rural community to bear and I am very very concerned about the volume of HGV traffic on roads not designed for it. A point glibly ignored in all of these proposals.

- National Grids Nautilus Interconnector seeks to exploit a Friston connection point which is not yet consented, or built. If a Friston grid connection is consented for EA1N & EA2 BEIS it would facilitate a 'trojan horse' for Nautilus and numerous other projects all within a small 10km radius – How can National Grid or BEIS justify this? I don't think I'm being overly cynical in not believing that this would be the end of it.

- The key issue at this stage is 'Cumulative Impact': East Suffolk cannot bear the brunt of the impact of all the energy projects, already in the public domain, proposed for this small geographic area:
 1. Sizewell C [EDF]
 2. EA1N windfarm and substation [Scottish Power]
 3. EA2 windfarm and substation [Scottish Power]
 4. Nautilus – plus onshore convertor station [NGV]
 5. Eurolink – plus onshore convertor station [NGV]
 6. UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
 7. Five Estuaries [RWE] – proposed offshore windfarm extension
 8. North Falls [SSE & RWE] – proposed offshore windfarm

Cumulative Impact has not been properly assessed in Scottish Power's EA1N & EA2 examinations, let alone in conjunction with the obvious impact of a Sizewell C construction & other proposed projects.

I would note this particularly with reference to traffic: the A12 will have thousands of additional HGVs on it, disseminating off into small rural lanes. It is perfectly fine for the likes of Scottish Power to say they'll just change the road network, but people live here, they cycle here, they walk and run here. Are they to be kept off their own roads because of many hundreds of heavy vehicles that will now thunder along these roads?

In the absence of this assessment and given all the environmental damage these projects will result in onshore, the Secretary of State has to consider a split decision on Anglia One North & East Anglia Two (EA1N & EA2). This is advocated by all community groups in the area and also supported by the local MP Therese Coffey.

A split decision gives the government the opportunity to:

1. fully evaluate 'cumulative impact' of energy proposals and ensure Suffolk HeritageCoast's iconic but fragile nature-based culture and tourist economy is not damaged by numerous uncoordinated energy projects.
2. choose a grid connection on a brownfield or pre-industrialised site which has the long-term capacity to act as a wind energy and inter-connection hub.
3. ensure a grid connection is chosen in line with the governments own commitment to protect AONBs and provide more protection for the natural environment.
4. facilitate timely consent for EA1N & EA2 to connect to the grid with least damaging development in a location that could support additional projects like Nautilus, whereby avoiding the costly/lengthy prospect of Judicial Review as experienced in Norfolk.
5. pilot an East Anglian 'Pathfinder' project to integrate offshore solutions to minimise disruption from multiple offshore to onshore grid connections.
6. ensure the opportunity is taken now, to seek to get things right now and to minimise the negative externalities on local residents.

Only if onshore solutions are found that minimise destruction of ecology (plant life and habitat), damage to the AONB, damage to tourism and damage to communities and ensuring connection via a brownfield/industrialised site could these projects contribute positively to climate change and support the governments stated intent in this regard.

Yours faithfully,

Sarah Prior

[REDACTED]

From: [REDACTED]
Sent: 24 October 2021 17:39
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Cc: [REDACTED] <Ofshore.Coordination@ofgem.gov.uk>; COFFEY, Therese
[REDACTED]
Subject: Mass energy industrialisation plans for East Suffolk coasts and heaths

Dear Mr Kwarteng

We wish to express our opposition for the plans by Scottish Power Renewables and National Grid Ventures to locate an energy hub at or near Friston. Although we appreciate the need for offshore wind power generation, the siting of sub-stations in East Suffolk is completely unacceptable. This is an area of outstanding natural beauty and the local economy depends to a very large extent on tourism. The surrounding countryside would be bighted, not only during construction, but forever due to the magnitude of the proposed buildings. Minister, by all means approve plans for offshore wind farms but please make every effort to find a better location for the power lines to be bought onshore. Perhaps the Thames estuary or other brownfield sites would be much better.

Yours sincerely,
Nicholas and Vivienne Holt



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Virus-free. www.avast.com

From: [REDACTED]

Sent: 24 October 2021 15:20

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.sate@beis.gov.uk

Subject: FW: East Anglia 1 North and East Anglia 2 Wind Farm Proposals

Dear Secretary of State,

I am writing as a resident of Aldeburgh and also as someone who has been heavily involved in developing the tourism economy of the Suffolk Coast.

I am totally supportive of offshore wind energy in the North Sea. I am totally opposed to the current proposals for bringing the energy on shore and linking to the grid at Friston. I believe that the application by Scottish Power should be considered in 2 parts – the offshore turbines and the onshore substations. The former should get approval, the latter be rejected and the applicants asked to revisit their options for landfall and substations. My reasons for taking this view are:

- **Environmental.** Friston is on the edge of an AONB in lovely countryside. The cable corridors will run through fragile cliffs at Thorpeness and through the AONB, causing massive disturbance to important habitat and making appalling scars on the landscape.
- **Precedent.** If the substations for EA1N and EA2 were given approval at Friston, a precedent would be set for future energy infrastructure that would be hard to defeat. The Nautilus Interconnector is already in the pipeline for the same location and many other wind farms are planned that will need on shore infrastructure. This would lead to wholesale destruction of a wonderful green field area that includes both AONB and SSSI.
- **Economic** The economy of the local coastal area is almost entirely based on tourism and is flourishing. This is largely thanks to the attractiveness of the natural environment, the history and culture, the outdoor activities on offer and the way that this has been marketed to create a clear and attractive reputation for the Heritage Coast. Research by the Suffolk Coast DMO indicates a very significant reduction in tourism visits to the area should Friston go ahead and even worse if Sizewell C is developed at the same time. The economy would be very badly effected during the development period but there would also be a lasting effect on the area through the change in image to the Energy Coast.
Current businesses are not geared up to cater for an industrial market. The Suffolk Coast is an outstanding example of a seaside economy that works exceptionally well. It would be destroyed.
- **Traffic.** The road system planned to bring materials to site is completely unworkable. The A1094 in to Aldeburgh is far too narrow for all the HGVs planned and the roundabout in Aldeburgh to which they would come is already dangerous.
- **Alternatives.** There are brown field sites where all this infrastructure could be accommodated and where the local economy might benefit. It can only be the cost advantages of linking to the grid near Sizewell that are driving this proposal. The applicants must be made to fully evaluate alternatives and the detriment to the economy within a 10 mile radius of Friston taken fully into account.

It is unclear how the combined effect of Sizewell C and the Friston developments are to be considered should both get consent. Surely the case for a new access to the sites must be considered and the evaluation of the 4 village bypass revisited. It does seem extraordinary that there has never been a master plan for energy projects on the Suffolk Coast. Why is this the case?

Yours sincerely

Tim Rowan-Robinson

[REDACTED]

From: Martin Allen [REDACTED]

Sent: 25 October 2021 12:53

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

I write as a regular visitor to East Suffolk and a strong believer in Green energy solutions but not ones that are detrimental to the countryside (and therefore non-ecological). In this case the plans will also affect tourism, local economy and nature interests like bird watching etc.

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention. As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully

Sent from [Mail](#) for Windows

From: ANTHONY, Ball [REDACTED]
Sent: 25 October 2021 11:41
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>
Subject: EA1N and EA2 Offshore Wind Applications

Dear Secretary of State
East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

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Anthony D. Ball

From: Judith Gordon [REDACTED]
Sent: Monday, October 25, 2021 8:16:25 PM
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>;
[REDACTED]
[REDACTED]
[REDACTED] Offshore Coordination
<offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com
<info@nautilusinterconnector.com>; [REDACTED]
[REDACTED]
Subject: Applications EA1N and EA2

Dear Secretary of State,

I am writing to ask that you support a split decision in relation to the above applications. The community of Leiston and the surrounding countryside will be seriously affected if the application goes ahead in full.

I completely support the principle of offshore wind power, as part of the UK strategy to combat climate change.

But, I am seriously concerned that the proposed onshore infrastructure will do incredible damage to the unique Suffolk Sandlings habitat, an AONB. It is my opinion that the proposed infrastructure has not been properly thought through, particularly the integration between the three projects currently impacting the Leiston area - Sizewell C, Scottish Power (Friston Substation) and most recently, the National Grid, Nautilus Interconnector.

It would make much more sense to thoroughly investigate suitable brownfield or industrial sites for the proposed infrastructure, and / or a coastal "ring main" system, which would minimise damage to the environment potentially caused by multiple cable trenches cutting across coastal land across the whole of the East of the UK.

I am therefore requesting that you:

1. Recommend the proposed offshore turbines for consent, thus ensuring that no time is wasted in respect of the construction of the turbines.
2. Reject the proposed onshore infrastructure, in favour of full consideration of better locations for this infrastructure, where the adverse impact can be minimised at a brownfield or industrialised site.

I am grateful to our local MP, The Right Hon Dr Therese Coffey, who has been championing the above suggested split decision.

With Kind regards,

Judith Gordon



Sent from [Mail](#) for Windows

From: Linda Grover [REDACTED]

Sent: 25 October 2021 11:17

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; minister.state@beis.gov.uk;

[REDACTED] Therese COFFEY [REDACTED] Offshore
Coordination

<offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com; [REDACTED];

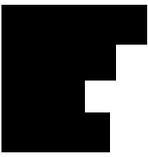
Cc: John Grover [REDACTED]

Subject: EA1N & EA2

Please find attached a letter for your consideration

Regards

Linda Grover



25.10.21

Dear Sir/Madam

Scottish Power Renewables EA1N and EA2 Offshore wind project

We are residents of Friston, Suffolk, where Scottish Power Renewables (SPR) have chosen to locate their sub station for the above project. The project is still with The Planning Inspectorate, and I am asking for your help to facilitate a split decision: a decision that will allow the offshore windfarms to go ahead but that will reject the onshore substation.

This split decision has been championed by our local MP. The Rt Hon Dr. Therese Coffey MP and would give time to investigate The Prime Minister's statement that The UK could be the Saudi Arabia of wind with an **OFFSHORE SUBSTATION**. This statement quite clearly implies that The PM is conversant with the needless destruction that will be caused to the onshore environment and suggests that more time is required to investigate the greener solution of taking substations off shore. It would be a shame if haste is given to planning consent at Friston, when The PM is so clearly advocating a different approach.

It is hard to understand why Friston has been chosen at all as a suitable place for a substation. Why turn an area of beauty into an industrial hub when there are plenty of brown field sites and existing infrastructure that SPR can connect to? Why create landfall just outside Thorpeness in an area known for its coastal erosion and outside a unique village, the subject of many books and documentaries all extolling its virtue as a unique, holiday village? It beggars belief that this one project of 2 substations will be nearly 3 times the size of Wembley Stadium – bigger than Friston itself and this is just the start. Nautilus interconnectors have just started their consultations, siting Friston as their preferred site and this will be followed by others. There are currently 8 offshore wind energy and interconnector projects planned, all heading this way. With the planned 8, plus Sizewell C., this area of East Suffolk will be decimated. Suffolk coastal paths will disappear, The Suffolk Sandlings and Heaths area of Outstanding Natural Beauty, ancient forests and medieval villages will be scarred for life and natural habitat at RSPB Minsmere will take decades to recover.

In short, we feel that Friston is not the place for a substation and SPRs onshore plans should be rejected, with your help, by the planning inspectorate. Then the joint impact of all projects can be considered. A new opportunity will exist to investigate an East Anglian Pathfinder project with integrated offshore solutions which would minimise connections onshore. If this is not achievable then grid connections should be on a brownfield or industrialised site which has the long term capacity to act as a wind energy hub.

You need to get this right from the beginning, don't mess it up by rushing headlong into bad decisions. Let your legacy be that you intervened to make wind energy truly green and not just a number crunching exercise that fulfils Government energy targets at any cost.

Yours faithfully

John and Linda Grover



From: John Lloyd [REDACTED]

Sent: 25 October 2021 18:41

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>;
kwasi.kwarteng.mp@parliament.uk

Cc: [REDACTED];

[REDACTED] offshore.coordination@ofgem.gov.uk; Offshore Coordination
<offshore.coordination@beis.gov.uk>

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State,

I am writing to with regards to East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

It is important to me that East Anglia plays a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it has become increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and interconnectors are being proposed) 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 industrialised sites such as Bradwell, The Isle of Grain or Branford, Ipswich, which are far better aligned with our government policy.

In order not to delay the offshore turbines, which I endorse, I am urging you to deliver a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected. I understand Therese Coffey our local Member of Parliament also advocates this 'split decision' and her own expression of this approach as presented at the EA1N & EA2 examination on 28th May 2021.

This 'split decision' would buy time. Time for the UK government to take the lead and deliver the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. I implore you to recommend a 'split decision'.

Yours faithfully

John Lloyd



From: Louisa Thorp [REDACTED]
Sent: Monday, October 25, 2021 9:36:49 PM
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) [REDACTED]; [REDACTED]
[REDACTED]
[REDACTED] Offshore Coordination
<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk
<offshore.coordination@ofgem.gov.uk>; box.offshorecoord@nationalgridESO.com
<box.offshorecoord@nationalgridESO.com>; InfrastructurePlanning@communities.gov.uk
<InfrastructurePlanning@communities.gov.uk>; [REDACTED]
[REDACTED]
[REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

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There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully
Louisa Thorp

Louisa Thorp

[Redacted signature block]

[Redacted contact information block]

From: Carole Filby [REDACTED]

Sent: 26 October 2021 12:09

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Hands, Minister (BEIS)

[REDACTED] Offshore
Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully,
Carole Filby

Sent from my iPhone

From: sarah courage [REDACTED]

Sent: 26 October 2021 10:36

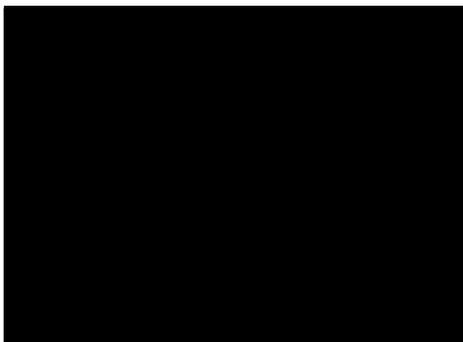
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; therese COFFEY [REDACTED]

[REDACTED] Offshore Coordination

<offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

[REDACTED] **Subject:** Saving Suffolk



26th October 2021

To The RT Hon Kwasi Kwarteng MP

SCOTTISH POWER RENEWABLES EA1N & EA2
SPLIT DECISION REQUIRED

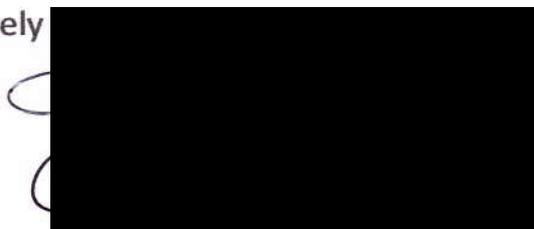
I am writing again to you to ask you to recommend a SPLIT DECISION on the applications for EA1N and EA2 by Scottish Power. We would ask you to recommend the offshore turbines for consent but reject the onshore infrastructure in favour of a more suitable brownfield site. For example GRAIN, Bradwell or Bramford.

This would show to the world that the government means GREEN by protecting Suffolk's East Coast AONB's, fragile cliffs, nature based tourism around Minsmere's RSPB and Dunwich Heathland. To allow this cherished landscape to continue to flourish in line with government policy. The Conservative Government must not be seen to be 'Greenwashing'. The recent launching of the Nautilus Interconnector consultation process reveals the hard evidence of how severely Suffolk Heritage Coast and Heathland are threatened.

We need an East Anglian 'Pathfinder' project with integrated offshore solutions which would minimise connections onshore.

We are desperate here. You need to make the right decision for nature in this area.

Yours sincerely



Charles H. Courage
Sarah F. Courage

From: ANDREW DRUMMOND [REDACTED]

Sent: 26 October 2021 16:32

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: DESECRATION OF SUFFOLK LANDSCAPE AND VILLAGES

To The Rt Hon Kwasi Kwarteng M.P. Secretary for the Department of Business ,Energy and Strategy

Dear Sir

[REDACTED] the view is of Snape Church on the far side of Church Common. At present one of the sites proposed for a massive Converter and huge associated industrial site is just behind this ancient church and contiguous with the village of Snape. There seems no reason why such an installation could not be located at the coast where the relevant cables come ashore and away from centres of population.

Construction of offshore turbines and an increase in renewable energy generation are obviously to be welcomed by us all but minimising environmental impact must be a priority?

If the Wind Turbines are to be approved I would urge the Secretary of State to split his decision so that more consideration can be given to the site of Converter stations to protect local quality of life, native wildlife and the Suffolk Heritage coast

Yours Sincerely

Andrew Drummond

[REDACTED]

From: John Pigneguy [REDACTED]
Sent: 26 October 2021 09:19
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk
Subject: Sizewell/Friston

Dear Sir

The calamitous proposals regarding Scottish Power Renewables at Friston and the Sizewell C project as a whole are an environmental disaster-in-the-making. As has already been said, the destruction caused to the onshore environment, local tourist economy and coastal communities will be devastating.

In order to give time for re-consideration on all these and other related points, the turbines could certainly go ahead but the onshore infrastructure is re-considered for better locations ie brownfield or industrialised sites.

In other words, a “split decision” is the only answer and one that I hope you will recommend.

Yours sincerely

John Pigneguy

From: Denise Ryder [REDACTED]

Sent: 26 October 2021 16:34

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP [REDACTED]

Subject: Nautilus

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy. The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#). This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard. Personally I cannot believe that an area of outstanding natural beauty as this area in Suffolk is being considered, as I understand brownfield sites are available, so Why? Why? Why? This area is so special in so many ways, a fragile environment that could be lost forever. Please do not let this happen

Yours faithfully

Denise Ryder

From: Paul Spendlove [REDACTED]
Sent: 26 October 2021 14:36
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Mass Industrialisation of East Suffolk

Rt Hon. Kwasi Kwarteng MP,
Secretary of State for Business, Energy & Industrial Strategy

From Paul Spendlove.
[REDACTED]

Dear Secretary of State,

East Anglia One North Offshore Wind Farm Project - EN10077
East Anglia Two Offshore Wind Farm Project - EN10078
National Grid proposals for Nautilus, a multi-purpose interconnector
Eurolink multi-purpose interconnector?? Sizewell C??? **Really?**
They cannot possibly be serious.

I am certain that you will be aware of the many thousands of objections that have been made to the two new wind farm planning applications and the geographical spread of those many thousands of people whose lives will be seriously and devastatingly affected in the short, medium and long term. You will also know exactly what these objections are. And you could hardly be surprised. This is not NIMBY time but the **permanent destruction** of dozens of acres of unspoilt countryside and the **permanent destruction** of the lives of residents in Friston and its approaches. That's 10km of 60m wide trenching and 35 acres of substation.

Really? They cannot possibly be serious.

You must also be aware of the 'out of the blue' consultation from National Grid, welcome as it is, clinging onto the back of someone else's planning application, and unwelcome as it is, compounding the **permanent destruction** of land and people's lives through more, huge trenches and more, huge, totally alien structures of up to 24m in height and covering an additional 24 acres. **Morally criminal. Really? They cannot possibly be serious.**

If Friston doesn't matter to you, and if the beautiful cliffs of Thorpeness don't matter to you, and Leiston, Aldringham, Coldfair Green, Knodishall, Sternfield, Snape, Aldeburgh, Saxmundham and the delightful homes and farmlands in between, don't matter to you, then Planning Consent seems inevitable. Does this corner of East Suffolk really matter? Pile it all in here as there is no alternative.

Or is there? How about a co-ordinated, alternative approach to what would otherwise evolve into the largest complex of energy infrastructure in the UK? You must have a **site visit**. Grant consent for the offshore turbine elements of these applications; **think** it through, **talk** with our Member of Parliament, and then **work out a far, far better solution**. But do get on with it, please! Our lives have been blighted for too long already.

With very best wishes,
Paul & Caroline.

From: Josef Wondrak [REDACTED]

Sent: 26 October 2021 10:24

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED] COFFEY, Therese
[REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; [REDACTED]
[REDACTED]

Subject: Re: Objection EA1N and EA2

Josef and Wendy Wondrak
[REDACTED]

To: Rt Hon Kwasi Kwarteng
Rt Hon Greg Hands
Rt Hon Michael Gove
Rt Hon Dr Therese Coffey

Subject: Application for EA1N and EA2

We are asking you to recommend a SPLIT DECISION

Construction of turbines offshore to proceed, but onshore infrastructure rejected, to allow for better locations where adverse impacts are minimized at brownfield, industrialized sites, or the pilot of East Anglian "Pathfinder"

You already know that:

- The village of Friston / Church is sited 250metres / 350metres from 2 substations and National Grid Connector
- Grove Road is a single track road, so the planned HGV Haul Route is only metres from houses north of Friston.
- Flooding mitigation proposals of collection ponds does not include problems from the cable routes/ haul road sited east of the village
- The GRIDLOCK caused by this construction before adding the major effects from Sizewell C, meaning 12 years of noise pollution and chaos.
- The vultures of Nautilus and Eurolink are already circulating to ensure the once quiet special rural area will be swallowed into this new industrial HUB
- SPR / National Grid have lied from the very start of their application and will stop at nothing to get your approval.

You now owe this "SPLIT DECISION" for millions of people that now and in the future can enjoy this very special area of SUFFOLK.

Simply GREED is hiding under the umbrella of GREEN

Yours faithfully

Josef and Wendy Wondrak

From: Piper, James (Mr) [REDACTED]

Sent: 27 October 2021 13:01

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk; [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

[REDACTED] **Subject:** East Anglia 1 North and East Anglia 2 Wind Farm Proposals

Dear Secretary of State,

I am writing as someone who has had their primary residence in Aldeburgh since 2004.

- 1) I am **supportive** of offshore wind energy in the North Sea and believe that the offshore turbines should be approved.
- 2) I am **opposed** to the current proposals for bringing the energy on shore and linking to the grid at Friston and believe that the current plan for onshore substations should be rejected.

The following are my reasons:

- **Environmental:** Friston is on the edge of an AONB in lovely countryside. The cable corridors will run through fragile cliffs at Thorpeness and through the AONB, causing disturbance to important habitats and making significant scars on the landscape.
- **Precedent:** If the substations for EA1N and EA2 were given approval at Friston, a precedent would be set for future energy infrastructure that would be hard to defeat. The Nautilus Interconnector is already in the pipeline for the same location and many other wind farms are planned that will need on shore infrastructure. This would lead to wholesale destruction of a wonderful green field area that includes both AONB and SSSI.
- **Economic:** The economy of the local coastal area is almost entirely based on tourism and is flourishing. This is largely thanks to the attractiveness of the natural environment, the history and culture, the outdoor activities on offer and the way that this has been marketed to create a clear and attractive reputation for the Heritage Coast. Research by the Suffolk Coast DMO indicates a very significant reduction in tourism visits to the area should Friston go ahead and even worse if Sizewell C is developed at the same time. The economy would be badly affected during the development period but there would also be a lasting effect on the area through the change in image to the Energy Coast. Current businesses are not geared up to cater for an industrial market. The Suffolk Coast is an outstanding example of a seaside economy that currently works exceptionally well.
- **Traffic:** The road system planned to bring materials to site is completely unworkable. The A1094 in to Aldeburgh is far too narrow for all the HGVs planned and the roundabout in Aldeburgh to which they would come is already dangerous.
- **Alternatives:** There are brown field sites where all this infrastructure could be accommodated and where the local economy might benefit. It can only be the cost advantages of linking to the grid near Sizewell that are driving this proposal. The applicants must be made to fully evaluate alternatives and the detriment to the economy within a 10 mile radius of Friston taken fully into account.

It is unclear how the combined effect of Sizewell C and the Friston developments are to be considered should both get consent. Surely the case for a new access to the sites must be considered and the evaluation of the 4 village bypass revisited. It does seem extraordinary that there has never been a master plan for energy projects on the Suffolk Coast.

Yours sincerely

James Piper

[REDACTED]

[Redacted]

James Piper
Head

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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From: Joc [REDACTED]

Sent: 28 October 2021 16:01

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED]

Subject: Non-Statutory Consultation - Nautilus Interconnector Suffolk

Dear Sir,

I am writing to you as a resident of the affected area. My considered view is that the electorate in the area affected by this consultation is being 'worn down' by the stream of consultations for energy projects that could gravely affect this tiny area. Whether this is a concerted effort or not it has the same effect, leading to consultation fatigue and subsequently disengagement.

As well as living in the area. I am a recently resigned District Councillor with responsibility for the affected Ward with East Suffolk Council; my resignation was triggered by my wishing to draw attention to my direct experience of this Council – distinctly different to that of the County Council - unfortunately failing to give the consideration and protection deserved to residents within the affected area. In my opinion, it is not operating in their best interests in this matter, and while I am of course no longer an elected Member I am still keen to support residents on this issue.

It is getting to a stage locally, when it is almost impossible to comprehend what further considered input communities will be asked to give, with the alarming total of 8 known major projects on the horizon within a 10 km radius. Should they proceed, the cumulative onshore impact of just the Sizewell C/D and SPR applications alone would be overwhelming, and this has not been sufficiently assessed in Scottish Power's EA1N & EA2 examinations.

A split decision to concentrate on the onshore issues, would allow the selection of a 'future-proofed' brownfield site with capacity as a wind generated energy and inter-connector hub, and also pilot a cutting edge and lasting Pathfinder project leading to a National Plan for energy infrastructure provision. This is supported by all local community groups and our MP Therese Coffey, and I would respectfully ask that it is given all due consideration.

Briefly, in common with the Sizewell C/D applications, these current projects (EAN1 North and EAN2) are being applied for in the wrong place(s). This may have been arrived at as a by-product of the UK apparently lacking a Central Government designed National Plan to co-ordinate the future construction of this country's much needed energy infrastructure, a potentially parlous situation for our country to find itself in. However, this situation also presents an excellent opportunity to urgently be able to address this shortfall before this application proceeds any further.

Yours sincerely

Jocelyn Bond

[REDACTED]

From: Ning Fulford

Sent: 29 October 2021 14:05

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Greg (BEIS) [REDACTED]

[REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; martin.moran@nationalgrid.com; [REDACTED]

Subject: Scottish Power and National Grid - EA1 &EA2 offshore wind farms and related onshore transmission infrastructure.

To: The Secretary of State the Rt Hon Kwasi Kwarteng,

re: Scottish Power and National Grid - EA1 &EA2 offshore wind farms and related onshore transmission infrastructure.

Please, speaking as a permanent resident of the village of Friston in Suffolk, you must do everything in your power to ensure that the onshore element of this application is turned down.

SPR's application itself ignores the true dis-benefits to the local area's economy, community and wildlife. The current road infrastructure is not fit to accommodate the amount (and type) of vehicles required for this project the list of negatives is endless.

Cumulative impact: we now have Nautilus conducting 'information days' – their glossy leaflet with smiling children playing on the beach reliably informing us that planning for their venture began in "...2019 with local Councils, parish and town councils and community groups across East Suffolk..." In addition there are further projects planned:

EDF – Sizewell C (2 proposed new nuclear reactors);

National Grid Ventures – Nautilus and Eurolink interconnectors & onshore convertor stations (2 proposed UK/EU subsea cables);

National Grid – UK interconnectors SCD1 & SCD2 (2 proposed UK grid connectors);

RWE – 5 Estuaries proposed offshore wind farm extension;

FWE – North Falls proposed offshore wind farm extension; all expecting to come to this area in the very near future.

Please, you must take into account the **cumulative impact** of all these projects on this area of Suffolk whose way of life will be destroyed – one of the few remaining wildernesses decimated for a quick fix with no long-term merit for any future generations.

Do the right thing, recognize that this is a gross deception on the part of these energy companies – they are avoiding presenting a joint plan that shows the true permanent loss of over 500 acres of high grade farmland (the honest footprint of their final site's once all the mitigation required is included). They should be using an area that is already a Brown Field site or exploring the possibilities of platforms off-shore.

I implore you to please ensure that this application is stopped – you need all the evidence before you – currently there is an appalling attempt by the energy companies to hide the true cumulative impact with all these separate applications – these tactics are a blatant attempt to conceal the truth.

Your decision will impact the future of this area, one of the jewels in Suffolk's crown, forever.

Yours sincerely

Ning Fulford [REDACTED]

From: Marion Wells [REDACTED]

Sent: 31 October 2021 13:18

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Energy plans for East Suffolk coast

To: The Rt Hon Kwasi Kwarteng MP

Please would you make a split decision on the applications from Scottish Power Renewables (EA1N and EA2) offshore wind projects. This split decision involves granting permission for the construction of the offshore wind turbines. But the onshore infrastructure plans must be rejected in favour of full consultation of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or industrialised site. Dr Marion Wells

[REDACTED]

From: Luigi Beltrandi [REDACTED]
Sent: 01 November 2021 20:35
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: FW: Scottish Power DCO application for East Anglia 1 North and East Anglia 2 Windfarms.

Dear Mr Kwarteng

I am a Suffolk resident.

I am in favour of a planned integrated renewable energy policy for this country.

I understand that the inspectorate has passed their recommendation on the above mentioned DCO for your decision.

Scottish Power have released the cynical statement below on the proposals before you for the first time identifying the project as part of their 'East Anglia Hub'. This from the company that in the East Anglia 1 offshore windfarm development has managed to deliver only 1/3 of the output which DCO permission granted.

Our East Anglia HUB, COP26 and the race to Net Zero

Hear from Ross Ovens, project director for ScottishPower Renewables' £6.5 billion East Anglia Hub, about how the East Anglian windfarms will make a big contribution towards the fight against climate change.

World leaders are meeting in Glasgow at the end of the month to explore how to address the global climate emergency at COP26, the spotlight will be on clean green energy for homes, businesses, and industry.

With the ambition of every home to be powered by offshore wind by 2030 – that means offshore turbines keeping the lights on in 30 million homes within nine years. And we can only achieve this plan by shaping the right infrastructure now.

As well as generating enough green electricity to power 2.7 million homes the ScottishPower Renewables East Anglia windfarms also bring community, employment and skills benefits.

[Read more about Ross's views on how these projects can support the UK's ambitions to meet climate change targets sooner.](#)

I would like to draw your attention to the number of proposed energy projects in East Suffolk in the heart of an area of outstanding natural beauty. These are being proposed independently of each other by separate developers.

1. The offshore windmills and landside development at Friston for three substations for East Anglia 1 North and East Anglia 2 windfarms submitted by Scottish Power currently awaiting your decision
2. The new development of the two nuclear reactors at Sizewell C possibly the largest energy construction project in the UK currently at being submitted as a DCO application.
Below is a photo of Hinkley point similar in scale to Sizewell C



3. The Nautilus Interconnector a planned DCO application by National Grid Ventures currently at public consultation.
4. The Euro link interconnector currently being planned

5. RWE Five Estuary offshore windfarm
6. RWE North Falls offshore windfarm

These major infrastructure projects are being planned or about to be given the go ahead within a thriving area of Suffolk. Their cumulative impact will be transformative on this precious fragile area turning a unique landscape into an industrial wasteland. This has not happened nor is it happening within a structured visionary development plan but in a piecemeal manner one project at the time. It is planning policy on the hoof for these are vast projects. This Government has sold its energy policy to the private sector consequently lost the ability to masterplan and coordinate multiple projects minimising their impact on the territory of the nation. Is this a sensible way for the 6th largest economy in the world to manage its energy policy? I sincerely hope that the Prime Minister will not jump the gun at COP 26 in announcing the East Anglia 1 North and East Anglia 2 projects prior to you having time to properly scrutinise the proposals and consider the objections raised at the DCO hearings particularly in respect of the land side infrastructure. Sustainability is not only about how energy is produced but must extend to understanding and minimising the impact that its delivery has on the landscape and the people it affects.

Yours sincerely

Luigi Beltrandi

From: Jill Hills [redacted]
Sent: 12 December 2021 16:37
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: windfarm proposals

)

Dear Kwasi Kwarteng,

I am writing to protest the proposals by Scottish Power renewables and National Grid to install a connection hub for their windfarm at Friston. This proposal would lead to the industrialisation of a whole track of the Suffolk countryside and mark the beginning of the end to our nature-based tourist economy.

In general my family and I are in favour of renewable electricity. For instance I had a ground source heat pump installed 15 years ago. But the proposals of other privately owned windfarms following on from the EA1N and EA2 projects will further decimate the local environment with the construction traffic blocking less than adequate road infrastructure and the razing of large areas of land for the cable 'motorways' from the coast. We are not only faced with the destruction reaped by these proposed windfarm connection hubs. (for instance Nautilus proposes a ten storey or 24 metre tower just across the road from the parish church and the AONB) but also with the construction of Sizewell C.

In making your decision on the Scottish Power / National Grid application I would ask you to follow those who ask you to pause and to look at the full impact of all these proposals on this small area of East Suffolk. It is not just one connection hub that you are making a decision on. We ask you to make a 'split decision' separating the offshore and onshore elements of the proposals, allowing the offshore turbine installation to start but holding back on the connection hubs until the combined impact together with Sizewell C can be assessed and an off-shore or other solution to the proposed decimation found.

Yours sincerely,
Jill Hills (Prof.r/td)

copies: Rt. Hon Theresa Coffey MP; Rt. Hon Greg Hands MP; Rt Hon Michael Gove MP; BEIS Offshore Review,

From: Ben McFarland [REDACTED]
Sent: 01 December 2021 13:40
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Cc: [REDACTED]; COFFEY, Therese [REDACTED] > **Subject:** Combined impacts of major energy infrastructure schemes in East Suffolk

Dear Minister,

I write regarding Suffolk Wildlife Trust's concerns about the combined ecological impacts of several national energy infrastructure projects in East Suffolk and to appeal for your intervention to increase the level of coordination between these and future schemes to safeguard the unique and internationally important wildlife and biodiversity of the Suffolk Coast.

Please find attached the letter detailing our concerns.

Your sincerely,

Ben McFarland

Head of Conservation
Suffolk Wildlife Trust

We can all help create a Wilder Suffolk, join us at: [REDACTED]

You can follow Suffolk Wildlife Trust on [Facebook](#), [Twitter](#) and [Instagram](#)

Image removed by sender.



[Suffolk Wildlife Trust](#)

Suffolk Wildlife Trust, Brooke House, Ashbocking, Ipswich, IP6 9JY. 01473 890089

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From: [REDACTED]

Sent: 02 December 2021 17:08

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Greg (BEIS) [REDACTED]

[REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; [REDACTED];

Subject: SCOTTISH POWER PROJECTS & THE NATIONAL GRID HUB

Dear Kwasi Kwarteng,

As you are aware, our Suffolk coast is currently subject to a number of offshore energy proposals by Scottish Power Renewables and National Grid. This includes a new NG connection hub at Friston. This was embedded in the Scottish Power applications I think without public consultation. If consented, the onshore infrastructure for these projects would lead to the irreversible industrialisation of the rural, fragile and beautiful area in which we live and work, and severely damage our nature-based tourism economy.

We urge you please to recommend a split decision when making your decision on Scottish Power's EA1N & EA2 projects and the National Grid connection hub. This would mean that the offshore turbine installation could commence without delay while providing the necessary time to: fully evaluate the cumulative impact of all the energy projects proposed for this area, including the Sizewell C project

develop a plan to maximise connection infrastructure out to sea, or under the sea, in order to minimise the amount of onshore construction

choose a grid connection on a brownfield or pre-industrialised site

ensure that the grid connection is chosen in line with the government's own commitment to protect AONBs and provide more protection for the environment

ensure that the opportunity is taken now to get this right

National Grid Ventures have already begun their non-statutory public consultation for their Nautilus Interconnector project with a connection at Friston that hasn't yet been consented. It is clear that consent for SPR's EA1N & EA2 onshore proposals would start a domino effect that would have dire consequences for the protected landscapes of the Suffolk Coast and Heaths area and the lives of everyone that live here. We therefore urge you, please, to take this opportunity to pause before it too late so that onshore solutions can be found that minimise the destruction of the environment and our communities.

Yours Sincerely

Eric Griffiths

Rt Hon Greg Hands MP (Energy Minister) [REDACTED]

Rt Hon Michael Gove (Communities SoS) [REDACTED]

Rt Hon Therese Coffey (Suffolk Coastal MP) [REDACTED]

BEIS Offshore Review offshore.coordination@beis.gov.uk

Nautilus Project Teaminfo@nautilusinterconnector.com

Suffolk Council Leaders: [REDACTED]

[REDACTED]

From: Luigi Beltrandi [REDACTED]

Sent: 08 December 2021 18:10

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED]

Subject: East Anglia 1 North and East Anglia 2 windfarms DCO applications by Scottish power

Dear Secretary of State

Our best wishes for Christmas and the New Year

We urge to the benefit of the nation to grant a split decision for the East Anglia 1 North and East Anglia 2 windfarms DCO applications. Allowing the offshore infrastructure but refusing the landside parts of the applications.

The Christmas card below outlines five salient points on why this is the only sensible way forward.

Yours Sincerely

Luigi Beltrandi



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



A SPLIT DECISION WOULD BE THE BEST CHRISTMAS PRESENT MERRY CHRISTMAS

These are five outstanding issues regarding SPR/NG EA1N and EA2

- ★ 1. **CUMULATIVE IMPACT WAS NOT PROPERLY ASSESSED.**
The planned energy hub of at least seven substations and connectors is too great a burden for this fragile coast and heathland.
- ★ 2. **FLOOD RISK IS SIGNIFICANT** during construction and afterwards. It was not fully assessed.
- ★ 3. **GAGGING ORDERS UNDERMINED THE EXAMINATION PROCESS.**
Affected parties were silenced.
- ★ 4. **THREATENED SPECIES AT THE RIVER HUNDRED SHOULD BE ACKNOWLEDGED** and the implications for the cable route reassessed.
- ★ 5. **INDEPENDENT TOURISM FORECASTS INDICATE A DECLINE AND A LOSS OF JOBS** in hospitality in the event of this energy industrialisation.



From: [REDACTED]

Sent: 08 December 2021 20:09

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office)

<minister.kwartengcorrespondence@beis.gov.uk>

Subject: Merry Christmas



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: [REDACTED]

Sent: 08 December 2021 18:37

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Proposed power hub at Friston

We beg you to agree to the preservation of this precious, fragile Coast and heathland.

Graham and Janet Staveley-Dick
Blyford, Halesworth, Suffolk



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: [REDACTED]

Sent: 08 December 2021 20:53

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Christmas wishes with a meaning

We wish for a split decision and hope we will not be disappointed



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: Ian Wiles [REDACTED]

Sent: 08 December 2021 18:23

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED]

Subject: Christmas Card

[REDACTED]



Virus-free. www.avq.co.m



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: Simon Seymour-Taylor [REDACTED]
Sent: 09 December 2021 09:19
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS) [REDACTED]
Cc: info@suffolkenergyactionsolutions.co.uk **Subject:** SPR/NG EA1N and EA2.

Please do the right thing...!!
Happy Christmas.

Simon Seymour-Taylor

[REDACTED]

[REDACTED] [REDACTED]



We Wish You A
Merry Christmas

DEAR SECRETARY OF STATE



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From: [REDACTED]

Sent: 09 December 2021 10:42

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED]

Subject: EA1N and EA2

Dear Secretary of State and fellow Ministers

This is not just another Christmas card. Please consider carefully the points outlined within.

With all good wishes for a Happy Christmas

Sarah Thornton



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: Nick Winter [redacted]

Sent: 09 December 2021 10:04

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk> >; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk> >; Hands, Minister (BEIS) [redacted]

Thérèse Coffey MP <[redacted]>

Subject: SPR/NG EA1N/EA2

Dear Secretary of State,

A split decision on the SPR EA1N/EA2 application would be the best Christmas gift anyone could give to this part of East Suffolk. It would be a wonderful present not just for Christmas but would last for decades to come, in fact for the lifetime of everyone in East Suffolk now and for those to come after us.

Thank you.

Nicholas B Winter

[redacted signature]

My Ref ID Nos: EA1N 20023910 and EA2 20023912



We Wish You A

Merry Christmas



DEAR SECRETARY OF STATE



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MERRY CHRISTMAS**

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From: timothy beach [REDACTED]
Sent: 10 December 2021 14:07
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED] BEIS Correspondence <BEIScorrespondence@beis.gov.uk>;
[REDACTED]
Subject: Further letter from Snape Parish Council re EA1N and EA2

Dear Secretary of State,

please find attached a letter following up previous correspondence.

Regards

Tim Beach

Snape PC



Department for
Business, Energy
& Industrial Strategy

Councillor Tim Beach
Chair, Snape Parish Council
Snape PC
Church Road
Snape
IP17 1SZ

Rt Hon Kwasi Kwarteng MP
Secretary of State
Department for Business,
Energy & Industrial Strategy
1 Victoria Street
London
SW1H 0ET

T +44 (0) 20 7215 5000
E enquiries@beis.gov.uk
W www.gov.uk

Our ref: MCSL2021/04160

12 February 2021

Dear Councillor Beach,

Thank you for your email of 3 February on behalf of 45 town and parish councils in Suffolk, and its kind message of congratulation following my appointment as the Secretary of State for Business, Energy and Industrial Strategy.

I am delighted to be leading the drive to support businesses and foster innovation across all parts of the United Kingdom. Having previously held the role of Minister of State for Business, Energy and Clean Growth in the Department, I remain committed to delivering our net zero ambitions, building on the Energy White Paper and the Prime Minister's Ten Point Plan.

I appreciate your offer of a meeting. Unfortunately, and as I hope you will understand, due to current restrictions, I am unable to accept your kind invitation. However, this is something I will bear in mind when restrictions allow.

Thank you again for taking the time to write. I look forward to working with you in the near future.

Yours sincerely,



RT HON KWASI KWARTENG MP
Secretary of State for Business, Energy & Industrial Strategy



Rt Hon Kwasi Kwarteng MP,

Secretary of State Department for Business, Energy & Industrial Strategy,

1 Victoria Street London,

SW1H 0ET.

Ref: MCSL2021/04160

Dear Secretary of State,

You may recall that when I wrote on behalf of our group of 45 East Suffolk town and parish councils to you in February 2021 about development applications for EA1N and EA2 windfarms you replied that you were minded to meet us at a later stage in the application proceedings and once Covid restrictions allowed. Since your decision is due early next year, we hope that you can still find time in your diary to meet a small delegation prior your making any decision.

As we then wrote, and as has been since been endorsed by our MP Dr Therese Coffey, our concern is that the onshore impact of these proposed developments on our communities has not been properly presented in the planning process. This is because specific and detailed matters that we and Dr Coffey have raised consistently have not been adequately addressed by the applicants, Scottish Power, or have been 'noted' rather than acted upon. They include environmental damage, traffic disruption, noise and air pollution, and cumulative impact with other concurrent developments - all largely within our Area of Outstanding Natural Beauty.

You will be aware that Suffolk County Council has also expressed serious concerns about many of the same issues relating to onshore infrastructure, and the inadequacy of Scottish Power's submissions to the Planning Inspectorate.

For these reasons, although time is short and pressures upon you great, we hope that you will offer us a meeting. This will enable us to explain to you personally our strong support for offshore renewable energy, and our reasons for recommending that the onshore infrastructure development plans should be amended while the offshore elements of the applications are permitted. This is the so-called 'split decision', which we believe is in your power and in all our communities' interest, while still meeting the Energy White Paper targets and the Government's climate change commitments.

We look forward to hearing from you.

Yours sincerely,

Tim Beach
Snape Parish Council

From: [REDACTED]

Sent: 14 December 2021 00:03

To: Cox, Richard (Ministerial Support Unit) [REDACTED]

Subject: Attached Image

From:

[REDACTED]

[REDACTED]

10 December 2021

Rt Hon Kwasi Kwarteng
Secretary of State for Business, Energy and Industrial Strategy,
Department for Business, Energy and Industrial Strategy
1 Victoria Street,
LONDON SW1H 0ET

Dear Secretary of state,

I am very conscious of the critical importance of energy to our country and I support the development of both renewable energy and, in principle, an element of nuclear energy to maintain the base load on the grid.

There are a series of Nationally Significant Infrastructure Energy Projects being considered for East Anglia and, particularly, East Suffolk. The report of the Examining Authority on the first of these, Scottish Power EA1N and EA2 at Friston, is currently being considered by your department. This will be followed by Sizewell C next year, while planning is underway on Nautilus, Eurolink on shore converter stations, and UK Interconnectors SCD 1 and SCD2.

Having taken a close interest in the Examining Authority's work on Sizewell C, I am aware that all these projects are being pursued by developers in isolation and in competition. The examinations also appear to have been undertaken in isolation. Concurrently there are also a range of other significant building projects under consideration in the same area, once again being considered by local planners in isolation from the National projects; while at RAF Lakenheath, in West Suffolk, using the same road network, the USAF plans to spend nearly \$1Bn on construction to develop the base.

The cumulative negative impact of these uncoordinated projects on an area with a fragile transport infrastructure will be considerable, not only for the local communities and environment but also for the success of your energy policy. The competition for road and rail space, labour, materials and other resources will drive up costs, cause delays, exacerbate local opposition and increase risk, to individual projects (and Sizewell C itself is inherently very risky) and, cumulatively, your strategic objective.

My suggestion is that you delay a decision on Scottish Power until you are able to consider it, Sizewell C and the other NSIPs together, and then find a way of integrating these projects in a coherent way to optimise your strategic objective while minimising the deleterious impact on the area.

Yours sincerely

[REDACTED]

-----Original Message-----

From: Steve Stocks [REDACTED]

Sent: 13 December 2021 23:37

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Greg (BEIS) [REDACTED]

[REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; [REDACTED]

Subject: East Suffolk energy infrastructure projects

Dear Mr Kwarteng,

I live within the Suffolk Coast and Heaths AONB in the village of Snape, which I understand you visited recently. I am becoming increasingly alarmed by the ever-lengthening list of proposed energy developments lined up for our compact but hitherto generally unspoiled area, which is highly valued as a tourist destination for its quiet and its unique scenery.

As there is no obvious national strategic plan to guide the several potential contractors — such as Sizewell C, the land-based infrastructure for Scottish Power's EA1N and EA2 offshore windfarms, and a major connection hub for National Grid Ventures' (NGV) Nautilus Interconnector project — they are each fighting independently for space to not interfere with one another. Nor, without major despoilation of the area, is there the infrastructure to support the construction and operation of all these projects.

Furthermore, Nautilus assumes the proposed substation at Friston, although consent has not been granted. It would be unethical to justify Friston on the strength of NGV's non-statutory Nautilus public consultation, with their nebulous plans for Eurolink coming along too.

Although I fully and enthusiastically support the concept of offshore renewable energy production, it is unnecessary to permanently spoil a beautiful and unique area to do so. There are existing brownfield sites in Essex and Kent which could be used to accept cabling from one nationally co-ordinated offshore development in the form of a ringmain with a single access-point, rather than the several cables and onshore sites that are proposed.

To allow a careful reappraisal of the land-based infrastructure, I therefore respectfully ask that you recommend the so-called "split decision" to allow the complex offshore planning developments to start, as they will take several years, during which time a more reasoned integrated and sensible onshore plan can be agreed upon by Government.

Yours sincerely,

Stephen Lloyd Stocks

[REDACTED]

From: Lawrence Mallinson <[REDACTED]>
Sent: 14 December 2021 19:26
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS) <[REDACTED]>
Subject: A Christmas Card for the Secretary of State, BEIS - SPR/NG EA1N and EA2

Happy Christmas

Lawrence Mallinson
Managing Director

[REDACTED]



[REDACTED]

[REDACTED]



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



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From: lesley.swann06 [REDACTED]

Sent: 15 December 2021 08:24

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng Correspondence (Private Office) <minister.kwartengcorrespondence@beis.gov.uk>; Hands, Minister (BEIS)

[REDACTED]
Subject: Christmas Card for the Secretary of State, BEIS

Dear Secretary of State for BEIS & Cabinet Ministers,

On behalf of the residents, communities, businesses, wildlife and the natural landscapes of East Suffolk, we call for a SPLIT decision on EA1N & EA2.

Merry Christmas.

Mrs Lesley Swann & Mr John Swann
[REDACTED]



We Wish You A
Merry Christmas

DEAR SECRETARY OF STATE



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-----Original Message-----

From: Victoria Hambley [REDACTED]

Sent: 16 December 2021 14:10

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: PROPOSALS BY SCOTTISH POWER RENEWABLES FOR EA1N & EA2 AND A NATIONAL GRID HUB

Rt. Hon. Kwasi Kwarteng,
Secretary of State, Department of Business, Energy & Industrial Strategy

Dear Kwasi Kwarteng,

Proposals by Scottish Power Renewables for EA1N & EA2 and a new National Grid Hub

Over the last three years I have worked with local campaign groups and communities in response to the many energy projects proposed for our area. However, while I've written many representations and letters, I've never written personally to you. Until now. So this is a last minute personal plea to ask you to consider carefully the above proposals and the consequences of them for our communities before making your decision.

As Secretary of State and previously as Energy Minister you will be familiar with all the arguments against the onshore elements of these proposals: the irreversible industrialisation of this rural, beautiful, fragile area; the damage to our nature-based tourism economy on which so many of us rely; the destruction of the environment and with it further loss of biodiversity; the consequences for our Area of Outstanding Natural Beauty which is supposed to be afforded the greatest protection; the unprecedented nature of concreting over hundreds of acres of green fields next to villages prone to flooding. You will also be aware that we do not believe that these and many other issues were adequately addressed by either Scottish Power or National Grid during the Planning Inspectorate's examination.

There is, though, one further point that I'd like to make and that is about how we come to be in this appalling position:

In 2011 OFGEM commissioned a report on Offshore Transmission Co-ordination. It advanced many virtues of an Offshore solution including reduced total capital expenditure; reduced operating expenditure; reduced local environmental impacts; removal of cabling and landing sites from sensitive areas. It was, however, noted that the principal obstacle was a reluctance by individual private energy companies to invest in a system that was (a) not to their sole benefit and (b) would be likely initially to carry unused spare capacity.

In 2015 National Grid, working with developers including Scottish Power Renewables and the companies currently laying waste to much of Norfolk, commissioned their own report. They concluded that the projected target in the OFGEM report of 17.2 GW offshore wind generation being operational by 2030 was unrealistic and therefore concluded that it was neither economic nor efficient to progress with the development of an integrated design philosophy. And so it was business as usual and thus it remains even though they were clearly wrong.

It's widely acknowledged that the current radial system is not fit for purpose and should and could have been sorted out years ago. However, unless forced to do so, the energy companies will continue to put profit before environment and communities for as long as they possibly can. National Grid Ventures have already begun their non-statutory public consultation for their Nautilus Interconnector project with a connection at Friston that has yet been consented, and it is clear that consent for SPR's EA1N & EA2 onshore proposals would bring an avalanche of further projects to the area. Which is why I and thousands of others are asking you please to say No to the onshore element of these proposals while permitting the offshore elements to proceed. This would allow time to find a more acceptable onshore solution such as an industrial or brownfield site for these projects while more long-term offshore solutions are urgently progressed for future projects. You have the power to do this while still meeting the Energy White Paper's targets and the Government's climate change commitments. Please, don't make our communities be the ones to pay the price.

Thank you for reading this letter. May I wish you and your family a Happy and Peaceful Christmas.

Yours sincerely,

Victoria Hambley



Sent from my iPad

From: [REDACTED]

Sent: 18 December 2021 11:49

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; "Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP"

[REDACTED]; The Rt Hon Michael Gove MP [REDACTED]
Offshore Coordination <offshore.coordination@beis.gov.uk>; OFGEM <offshore.coordination@ofgem.gov.uk>;

National Grid ESO <box.offshorecoord@nationalgridESO.com>; NSIP Reform

<InfrastructurePlanning@communities.gov.uk>; Suffolk County Councillor, Richard Rout

[REDACTED]; East Suffolk District Councillor, Craig Rivett [REDACTED]

District Councillor, Russ Rainger [REDACTED]; District Councillor Tom Daly

[REDACTED]

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

Growing up in this country, a source of pride was our protection of green belt countryside which I believe is famous worldwide and a great magnet for attracting tourism from around the globe. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#). This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have nine years to get this right before 2030. **This is the moment for essential joined up thinking.** Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.
Yours faithfully

Philip Lines



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

28 January 2022

The Rt Honourable Kwasi Kwateng MP
Secretary of State for Business, Energy and Industrial Strategy
House of Commons
London
SW1A 0AA

Dear Mr Kwateng

RE: Mass Energy Industrialisation Planned for Suffolk Coast and Heaths

I am writing to draw your attention to a matter of urgency regarding the delivery of carbon-neutral energy to the National Grid and to the homes and businesses of the UK.

This is not a letter of complaint, rather one of encouragement to grasp this amazing opportunity. We are an island nation, surrounded by sea, and with some of the best engineers in the world. What better use of that expertise than to lead the world in the development of a universal system of handling carbon-neutral energy that we can then export all around the globe.

Current proposals for connection of green energy from North Sea windfarms and from Europe are stalled because of controversy over the route to the National Grid network. The proposals are piecemeal and confused.

One section of the National Grid: <https://www.nationalgrid.com/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus-interconnector> proposes the construction offshore of a Nautilus Interconnector that would receive energy from several sources and ideally direct it to a **brown field** site along the East Anglian coast. This application needs to be unlinked from the application to bring the power ashore and should be given the go-ahead as a matter of urgency.

Another section of the National Grid (National Grid Ventures) <https://www.nationalgrid.com>, in conjunction with SSE, has applied for permission to run underground cables across several miles of unspoilt protected rural land in Suffolk, on five equally destructive routes, terminating in very large, intrusive, substations, each covering up to 35 acres of **green field** land.

The five proposed onshore sites are situated along the North Sea coast from Sizewell southwards, resulting in multiple landfalls on a fragile coastline, any of which will cause significant destruction of biodiversity as wide cable routes, running for approximately 9 km, cut through the protected Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the River Hundred, the Sandlings SPA (Special Protected Area) or the sand-based and already crumbling coralline crag near Thorpeness.
<https://www.nationalgrid.com/document/143476/download>

Several possible alternative sites have been suggested, including the site of the former Bradwell power station in Essex and Lowestoft Eastern Energy Facility (LEEF) at www.generate-energy.co.uk. The

LEEF site near Lowestoft is being developed to directly support the offshore wind industry. What better site to construct an energy hub. Another possible site would be an extension of the existing sub-station to include the land on which the decommissioned Sizewell A station still stands.

National Grid Ventures' current proposals are destructive. Their sole objective is to link up to the Bramford sub-station. Have all possible alternative sites been investigated? Now is not the time to allow this destructive development to go ahead.

In conclusion, with your support as Secretary of State and in collaboration with the relevant parties, your department would prepare a model that will provide an ecologically suitable format for the delivery of offshore energy to suitable brown-field sites near the coast and which could then be replicated around the coastline of the British Isles. This is a matter of the utmost urgency in the sustained development of carbon-neutral energy.

Yours sincerely

[Redacted signature block]

Gillian Beardsworth (Mrs)

- cc. The Rt. Hon. Greg Hands MP minister.state@beis.gov.uk
- The Rt. Hon. Michael Gove MP [Redacted]
- The Rt. Hon. Therese Coffey MP [Redacted]
- The Rt. Hon Alok Sharma MP [Redacted]
- BEIS offshore.coordination@beis.gov.uk
- Nautilus Project Team info@nautilusinterconnector.com
- Nautilus Project Team [Redacted]
- Suffolk County Councillor [Redacted]
- East Suffolk District Councillor [Redacted]
- Suffolk Wildlife Trust (Hon.Sec.) [Redacted]
- GENERATE info@generate-energy.co.uk
- [Redacted]
- look.east@BBC.co.uk

From: Annette Mason-Gordon [REDACTED]

Sent: 04 February 2022 08:33

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: COFFEY, Therese [REDACTED] Offshore
Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

I am writing to you as a single Mum whose livelihood has depended upon the tourism industry for the past ten years with a full time job in a thriving business promoting holiday rentals throughout Suffolk. Additionally my children have benefitted from employment in the hospitality industry for the past three years which has assisted enormously in funding their time at university.

I see, first hand, the employment which this industry brings to the local people through associated jobs with housekeepers and trades people maintaining the properties; the service industry through restaurants, shops, tourist attractions etc. welcoming holiday makers; and the reinvestment made by homeowners giving jobs to the construction industry. Obviously, all this employment is critical to the local communities and the wellbeing of the people in Suffolk. East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these

projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours sincerely

Annette Mason-Gordon

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two;](#) [REDACTED]
Subject: PINS Ref: EA1N: EN010077 and EA2: EN010078 (East Suffolk)
Date: 07 February 2022 17:38:07

Dear Planning Inspectors and Secretary of State

I am writing an addendum to and in support of [REDACTED] Phil Lines, who wrote to you (below) on 18 December 2021 and again on 28 January 2022.

Driving and cycling along the country lanes of the East Suffolk Coast, dog walking along stretches of the Suffolk Coast Path, it is hard to imagine the changes that the below proposed onshore connector projects for EA1 and 2 Offshore Wind Farms will impact these experiences if they come to fruition.

There has to be somewhere for people to go to take in nature, recharge and find balance in a world where these havens are increasingly rare. For those who have chosen to make small villages and rural areas their home, either through existing family heritage or because they seek a peaceful life, the onslaught of this potential industrial behemoth does not really bear thinking about.

It is not as if the area is lacking a thriving economy. Value lies inherently in the area itself. It is a commodity that draws thousands of people every year to enjoy qualities and assets that have been fashioned by nature and, once destroyed, are irreplaceable by man.

I don't think there is any question that renewable energy is a force for good but by embarking on these 5 energy projects on the East Suffolk Coast, the environmental good created by new wind farms will be cancelled out by environmental degradation to an established area of beauty, disruption to/destruction of rural life, and damage to a healthy tourism economy.

Reference has been made to more appropriate brownfield or existing industrialised sites where local economies would benefit from new or revitalised industries. I do urge you to please to consider how the best interests of all can be served in assessing the feasibility of these projects to avoid the catastrophe that massive industrialisation would bring to the Suffolk Coast and surrounding villages and countryside.

Heather Li
[REDACTED]

From: philip lines [REDACTED]
Subject: PINS Ref: EA1N: EN010077 and EA2: EN010078
Date: 28 January 2022 at 07:25:22 GMT
To: EastAngliaOneNorth@planninginspectorate.gov.uk, EastAngliaTwo@planninginspectorate.gov.uk, "The Rt Hon Kwasi Kwarteng MP, Secretary of State for the Department of Business, Energy and Industrial Strategy (BEIS)"

[REDACTED]

Dear Planning Inspectors and Secretary of State,

Further to my previous email of 18th December 2021, I am writing again having considered the cumulative impact of the five confirmed energy projects planned to connect to the grid in East Suffolk. That is:

<!--[if !supportLists]-->1. <!--[endif]-->East Anglia One North Offshore Wind Farm (EA1N),

<!--[if !supportLists]-->2. <!--[endif]-->East Anglia Two Offshore Wind Farm (EA2),

<!--[if !supportLists]-->3. <!--[endif]-->Nautilus Interconnector,

<!--[if !supportLists]-->4. <!--[endif]-->Eurolink Interconnector, and now

<!--[if !supportLists]-->5. <!--[endif]-->Sea Link Interconnector.

If, as is widely believed the SCD2 Interconnector, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm follow, with the addition of Sizewell C Nuclear Power Station, **this will become the largest complex of industrial scale energy infrastructure in the UK**. Under the guise of Net Zero, an energy hub on an enormous scale would be constructed in the midst of an area of outstanding natural beauty on green belt land in rural Suffolk. The consequence of this avoidable development would be

1. **Multiple landfalls on a fragile coastline** of coralline crag (which is sand-based and already crumbling) near Thorpeness.
2. The destruction of biodiversity as **multiple cable routes**, running for approximately 9 km, cut through the protected Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the River Hundred, and the Sandlings SPA (Special Protected Area).
3. Multiple substation sites dramatically adversely affecting local rural communities including Theberton, Kelsale, Leiston, Sternfield, Snape and Saxmundham with the decline of the health and wellbeing of those impacted whose lives will never be the same.
4. Huge unrepairable damage to one of the UK's most successful nature based tourism areas with financial loss. This will crucially

lead to loss of jobs in hospitality and other tourist related businesses. This estimate does not factor in any decline from Nautilus, Eurolink or Sea Link.

5. Intolerable noise pollution, light pollution and air pollution to local communities, wildlife and livestock.

Cumulative Impact Assessments are a legal requirement of the Planning Inspectorate's Examination procedure. The Norfolk Vanguard wind farm DCO was overturned in a Judicial Review due to the failure to give consideration to Cumulative Impact, which goes to underline the significance of the point. From early in the Examination, National Grid has been challenged by Interested Parties and the Examiners to be transparent about the scale and detail of this Hub. Their failure to present the full picture into the Examination is deliberate obfuscation. Despite repeated requests from the Inspectors and Interested Parties, SPR's approach to cumulative impact was to ignore it or to provide the minimum possible information. Their fall back response of "*there remains insufficient information to undertake the assessment requested*" is not credible when one considers the evidence in the public domain on these projects. As a result, SPR has never provided a complete cumulative impact assessment of energy projects planned for the immediate area. The adverse impacts will outweigh any benefits to this region. Quite simply a catastrophe for the Suffolk Coast and Heaths and the people living within it.

This complex of industrial scale infrastructure in the midst of rural Suffolk is unmitigable and indefensible given the alternatives available. It is clear there are more appropriate brownfield or industrialised sites or sites in need of redevelopment such as Bradwell or Grain, which are better aligned with the government's environmental policy. **Alternative site options exist and should be seriously considered.** There is a better, greener solution.

The Rt Hon Therese Coffey MP's has sensibly proposed a split decision which grants consent for the offshore infrastructure but the onshore is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or industrialised site. This gives time to enable Ofgem/BEIS to follow through on a spatial strategy for wind energy infrastructure and the aims of the Offshore Transmission Network Review and pivot to better solutions for onshore wind energy infrastructure using a reduced number of cable routes at a brownfield site.

Phil Lines



From: Jessica J Cassey [REDACTED]
Sent: 08 February 2022 18:42
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED] info@nautilusinterconnector.com;
[REDACTED];
minister.state@beis.gov.uk; Offshore Coordination <offshore.coordination@beis.gov.uk>;
[REDACTED]
Subject: Suffolk Coast and Heaths

Dear Rt Hon Kwasi Kwarteng

I am writing to urge you to recommend a split decision on the energy plans for the Suffolk Coast and Heaths.

It makes no sense to destroy such a beautiful part of the world when there are other options available. The mental health impact for local communities will be severe.

Yours sincerely

Jessica Cassey

From: [REDACTED]
To: [East Anglia ONE North](#)
Subject: Suffolk wind farm project
Date: 13 February 2022 10:47:09

To Whom It May Concern

Please don't let the landfall site of the wind turbine's energy impact on the area around Aldeburgh, Suffolk.

I have been shown the plans and the effect on the area would be devastating and truly sad.

Wind power is good but what is being proposed is disastrous.

Whatever you can do to make the powers that be change their proposed site to an area that is not of natural beauty would be appreciated and all those who understand the terrible impact this existing plan potentially has will be eternally grateful.

Thank you.

Kind regards,

Rupert Wace

private

Rupert Wace

private

From: [REDACTED]

Sent: 14 February 2022 21:21

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Shore infrastructure for EA!N & EA2 - Off shore wind power sub-station in East Suffolk by the village of Friston, Suffolk.

Dear Minister,

I am writing you in reference to the large wind power sub-station that is planned in the village of Friston, East Suffolk. I have read a lot of articles about this project and it seems to be ludicrous. The project involves building massive structures and will create enormous damage to the local environment and communities affected. I strongly object to this project going forward.

The large sub-station that is proposed will cause significant economic damage to a beautiful part of country that includes Aldeburgh and Thorpness.and Snape. I support wind power but I cannot understand the economic case for this project, its location has obviously been selected because it is cheap to implement but at what economic and environmental cost? Surely it is better to find other brownfield sites closer to urban areas.

Best regards

Fred Beltrandi

[REDACTED]

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two;](#) [REDACTED]
Subject: PINS Ref: EA1N: EN010077 and EA2: EN010078
Date: 15 February 2022 13:44:42

Dear Planning Inspectors and Secretary of State,

I am writing to express my great concern over the impact of the five confirmed energy projects planned to connect to the grid in East Suffolk. These are:

<!--[if !supportLists]-->1. <!--[endif]-->East Anglia One North Offshore Wind Farm (EA1N),

<!--[if !supportLists]-->2. <!--[endif]-->East Anglia Two Offshore Wind Farm (EA2),

<!--[if !supportLists]-->3. <!--[endif]-->Nautilus Interconnector,

<!--[if !supportLists]-->4. <!--[endif]-->Eurolink Interconnector, and now

<!--[if !supportLists]-->5. <!--[endif]-->Sea Link Interconnector.

If the SCD2 Interconnector, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm follow these projects, along with the addition of Sizewell C Nuclear Power Station, we will have the largest complex of industrial scale energy infrastructure in the UK.

Under the guise of Net Zero, this energy hub on an enormous scale would be being proposed for construction in the midst of an area of outstanding natural beauty on green belt land in rural Suffolk and its ancient villages, with lasting and irreversible consequences and damage to the natural habitat and wildlife.

The consequences include:

1. **Multiple landfalls on a fragile coastline** of coralline crag (which is sand-based and already crumbling) near Thorpeness.

2. The destruction of biodiversity as **multiple cable routes**, running for approximately 9 km, cut through the protected Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the River Hundred, and the Sandlings SPA (Special Protected Area).

3. Multiple substation sites dramatically adversely affecting local rural communities including Theberton, Kelsale, Sternfield, Leiston, Knodishall, Friston, Snape and Saxmundham, with the decline in the health and wellbeing of those impacted and their lives never being the same.

4. Huge irreparable damage to one of the UK's most successful nature based tourism areas with financial loss. This will crucially lead to loss of jobs in hospitality and other tourist related businesses. This estimate does not factor in any decline from Nautilus, Eurolink or Sea Link.

5. Intolerable noise pollution, light pollution and air pollution to local communities, livestock and wildlife.

Cumulative Impact Assessments are a legal requirement of the Planning Inspectorate's Examination procedure. The Norfolk Vanguard wind farm DCO was overturned in a Judicial Review due to the failure to give consideration to Cumulative Impact. From early in the Examination, National Grid has been challenged by Interested parties and the examiners to be transparent about the scale and detail of this Hub. Their failure to present the full picture at the Examination appears to be deliberate obfuscation.

Despite repeated requests from the Inspectors and Interested Parties, SPR's approach to cumulative impact was to ignore it or to provide the minimum possible information. Their response of "*there remains insufficient information to undertake the assessment requested*" is not credible when one considers the evidence in the public domain on these projects. As a result, SPR has never provided a complete cumulative impact assessment of energy projects planned for the immediate area. The adverse impacts would outweigh any benefits to this region. Quite simply, it would be a catastrophe for the Suffolk coast and sandlings and those living in it; an area whose beauty and special character has inspired generations of artists, musicians and writers - from the 18th century poet George Crabbe to Benjamin Britten; from Ronald Blythe, Susan Hill and W. G. Sebald to Maggi Hambling.

This complex of industrial scale infrastructure in the midst of rural Suffolk is unmitigable and indefensible given the alternatives available. It is clear there are more appropriate brownfield or industrialised sites or sites in need of redevelopment such as Bradwell or Grain, which are better aligned with the government's environmental policy. **Alternative site options exist and should be seriously considered.** There is a better, greener solution.

The Rt Hon Therese Coffey MP's has sensibly proposed a split decision which grants consent for the offshore infrastructure but rejects the onshore development in favour of full consideration of better locations for this infrastructure, minimising adverse impacts at a brownfield or industrialised site. This also gives time to enable Ofgem/BEIS to follow through on a spatial strategy for wind energy infrastructure and the aims of the Offshore Transmission Network

Review; and to find better solutions for onshore wind energy infrastructure through a reduced number of cable routes at a brownfield site.

Yours sincerely

Frances Cahill

[Redacted signature]

[Redacted contact information]

-----Original Message-----

From: Sally Averdieck [REDACTED]

Sent: 15 February 2022 20:32

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Urgent Objection

I am objecting to the on shore infrastructure for EA!N & EA2 - it is in reference to the largest sub-station for off shore wind power with a proposed location in Friston, Suffolk. The decision is due 31st of March.

The scheme is huge and would be under construction for up to eight years. It will DESTROY all that is special about this part of the East Suffolk Coast and cause great harm to Aldeburgh, Thorpeness and Snape. We need wind farms but to bring this substation through this area of outstanding natural beauty would be criminal. A brown site alternative is a must. I hope and pray that this does not go ahead.

Sally Averdieck

Sent from my iPhone

From: [REDACTED]
Sent: 15 February 2022 18:10
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: project East Anglia ONE and TWO Offshore Windfarm with the Planning Inspectorate

Suffolk wind farm Hub,

Dear Secretary of State,

I write to you as a resident of our beautiful area around Aldborough in Suffolk and the surrounding country side, where there is a plan to pipe in the electricity generated by the offshore wind farm, it is quite beyond my understanding, why on earth this site is being proposed, this is an area of outstanding natural beauty, which is highly sort after, where employment is by and large well catered for, and here we are under review to house a sub station (or two) which is going to completely wreck the area in terms of road congestion, country turmoil, wildlife, carbon foot print, (when green energy turns to black). This is such a short sighted vision where the local population (except those selling land for the substations for enormous sums) are against it. Surely a brown field area, which is perhaps looking for more local employment, is a better option for this kind of project, it is simply madness destroying the precious little unspoiled country we have left for this type of project, please can you do something about it.....

Yours sincerely

William Gault

[REDACTED]

William Gault | Partner | Tanker Projects

[REDACTED]



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From: [REDACTED]

Sent: 15 February 2022 14:15

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy. **To willingly and actively seek to impose such destruction on some of the most beautiful parts of our country (not to mention that its green belt), goes against the very fibre of the green movement. How can you justify such a decision when the green agenda is supposed to be healing the planet, not destroying it further.**

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully

Edward Hunt

Conservative Member



-----Original Message-----

From: Helen Randall [REDACTED]

Sent: 14 February 2022 23:32

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Maria Azucena Tejada Randall Tejada [REDACTED] Therese Coffey MP

Subject: Objection to proposed substation development at Friston, East Suffolk

Dear Sir,

We are local residents and wish to object most strongly to the proposed substation development at Friston, Suffolk on the following substantive planning grounds:

(1) inappropriate industrial use in a rural location causing loss of visual amenity, (2) significant harm to the AONB and irreparable disturbance to natural habitats through construction activities and increased traffic movements (3) lack of sufficient highway capacity causing increased traffic congestion, air pollution and delays (4) lasting damage to the local tourist economy causing loss to local businesses and loss of jobs exacerbating impact of the CV 19 pandemic and Brexit (5) availability of more appropriate brownfield sites for the location of the proposed development.

We should be grateful if you could kindly acknowledge safe receipt.

Many thanks,

Helen & Maria Tejada Randall

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 14 February 2022 19:10
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) [REDACTED] "Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP" [REDACTED]; The Rt Hon Michael Gove MP [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; OFGEM <offshore.coordination@ofgem.gov.uk>; National Grid ESO <box.offshorecoord@nationalgridESO.com>; NSIP Reform <InfrastructurePlanning@communities.gov.uk>; Suffolk County Councillor, Richard Rout [REDACTED]; East Suffolk District Councillor, Craig Rivett [REDACTED]; District Councillor, Russ Rainger [REDACTED] District Councillor Tom Daly [REDACTED] County Councillor, Andrew Reid [REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications: please consider SPLIT decision and save our coast.

Dear Secretary of State,

You will have received many a letter regarding the adverse impact the current plans referenced above will have on the beautiful coast of Suffolk and I am not going to repeat what will have been written by the various action groups who quite correctly lay out the facts.

Most people including myself have no issue with wind farms as a carbon neutral supply of energy and I would encourage the continuation of this project in the North sea. What I DO have an issue with and which is totally unnecessary, is to locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) in the midst of one of the UK's most fragile nature based tourism destinations. I have no doubt this 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

I noticed the recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse as I have said, I am supporting a constructive way forward, a **'split decision'** between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings.

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst

minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully,

Laurelie Walter



From: [REDACTED]

Sent: 15 February 2022 19:55

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objecting to the onshore infrastructure for EA1N & EA2, Friston, Suffolk and around

Dear Secretary of State

I'm writing in the remote hope that adding my one voice to the campaign objecting to the proposed onshore infrastructure for the planned wind farms EA1N and EA2 might just tip the balance, causing you to think again about the proposal.

I'm sure you've been highly irritated by the sheer number of emails you've received on this topic. Too many for one inbox, I'm sure.

If so, can you imagine our, local, irritation, fury actually, over what will be sheer numbers of trucks, vehicle movements and people crowding onto our very inadequate road network for the next decade.

That's way too many for our coastal roads to accommodate.

Leave aside the environmental damage to fragile botanical and avian habitats - think of the prospect of so much dominant concrete structures around our precious rural areas. It's going to ruin this area of special beauty for ever.

Please reconsider!

Dick

Dick Warner
Chairman, Class

[REDACTED]

-----Original Message-----

From: Nick Bell 

Sent: 16 February 2022 11:43

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objection to Scottish Power EA1N & EA2 cabling and substation

Dear Secretary of State,

It simply beggars belief that approval could be granted for Scottish Powers plans for building a substation for

EA1N and EA2 near Friston in Suffolk. While fully in favour of offshore wind power, the construction of the 35 acre site would devastate an ancient and rural landscape and the cabling will run straight through the

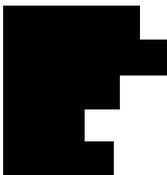
AONB.

Scottish Power's desire to save costs by building on a green field site like this one are shameful, and a classic example of market failure that will negatively impact residents and visitors for now and future generations.

I have never objected to a development before but this is beyond the pail. I will never vote for anyone or party who wantonly allow the destruction of our beautiful countryside - an increasingly scarce resource. How can we possibly lecture other countries on deforestation and other environmentally negative projects? What utter hypocrisy.

Yours sincerely,

Nicholas Bell



Sent from my iPad

From: [REDACTED]

Sent: 16 February 2022 15:02

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: FW: Largest Substation

To whom it may concern,

I object to the building of this substation in no uncertain terms at this site.

Yours truly,

Dee Clayton



[REDACTED]



We Wish You A

Merry Christmas

DEAR SECRETARY OF STATE



A SPLIT DECISION WOULD BE THE BEST CHRISTMAS PRESENT MERRY CHRISTMAS

These are five outstanding issues regarding SPR/NG EA1N and EA2

- ★ 1. **CUMULATIVE IMPACT WAS NOT PROPERLY ASSESSED.**
The planned energy hub of at least seven substations and connectors is too great a burden for this fragile coast and heathland.
- ★ 2. **FLOOD RISK IS SIGNIFICANT** during construction and afterwards. It was not fully assessed.
- ★ 3. **GAGGING ORDERS UNDERMINED THE EXAMINATION PROCESS.**
Affected parties were silenced.
- ★ 4. **THREATENED SPECIES AT THE RIVER HUNDRED SHOULD BE ACKNOWLEDGED** and the implications for the cable route reassessed.
- ★ 5. **INDEPENDENT TOURISM FORECASTS INDICATE A DECLINE AND A LOSS OF JOBS** in hospitality in the event of this energy industrialisation.



-----Original Message-----

From: Drake Davis [REDACTED]

Sent: 16 February 2022 12:38

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objection to onshore infrastructure for EA1N and EA2

Dear Secretary of State

I write to offer my strongest objections to the above proposal.

The construction would cause unnecessary and huge harm to a very beautiful and as yet untouched part of our country with damage to agriculture , wildlife and a vibrant tourist industry.

Wind power is a sensible option for the future but the power generated offshore should surely be sent by underwater cable to a brownfield site such as in the Thames Estuary and thus save wanton destruction of a large and beautiful site in Suffolk. Yours sincerely

Drake M Davis

Sent from my iPad

From: [REDACTED]

Sent: 16 February 2022 09:38

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Shore infrastructure for EAIN and EA2 substation at Friston

Dear Secretary of State,

I write to urge you to decide against the above project. I shall not rehearse the many environmental, economic and cultural arguments against it, with which you are familiar. The need for wind power is accepted. The problem is where it should be brought ashore.

Ultimately this decision will be a test of the current government's values.

A decision to reject the Friston plan and instead have the cable brought ashore on a suitable brownfield site will demonstrate the government values. A decision against the Friston project would boost the Government's reputation in relation to the environment, culture and local economies. It would at the same time have positive effects for the ultimate brownfield site arrangement and its economy.

Yours faithfully

Dawn Oliver QC, FBA, LLD

Emeritus Professor of Constitutional Law, UCL.
[REDACTED]

From: Linda Hawes [REDACTED]
Sent: 16 February 2022 21:56
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED]; [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk; box.offshorecoord@nationalgridESO.com; InfrastructurePlanning@communities.gov.uk; [REDACTED]; [REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this ‘split decision’ and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This ‘split decision’ would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government’s Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government’s stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let’s not have wind energy at any price. Please recommend a ‘split decision’.

Yours faithfully

Linda Hawes

[Redacted]

[Redacted]

[Redacted]

-----Original Message-----

From: Maryanne Nicholls [REDACTED]

Sent: 16 February 2022 08:01

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Friston /Scottish Power

Dear Secretary of State,

I am writing to you again to urge you not to give permission for this ill considered project. You must know by now of the massive opposition in the local area.

If you were to give permission for these substations to go ahead it would further damage trust in Government which is at an all time low. Please choose a better brownfield site which can support the construction traffic required for such a project.

Yours sincerely
Maryanne Nicholls

Sent from my iPhone

From: [REDACTED]
Sent: 16 February 2022 13:38
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Substation. Friston, Suffolk.

Hi. Im totally against this scheme on our beautiful coastline. Regards. Jamie Philpot.

Get [Outlook for Android](#)

From: Jack Wake-Walker [REDACTED]
Sent: 16 February 2022 10:44
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Objection to the on shore infrastructure for EA1N & EA2

Hi there,

I'm a Suffolk resident letting you know that I strongly object to the building of on shore infrastructure in the Suffolk area, for the proposed offshore wind farm. I believe the wind farm should go ahead, but it should not be at the detriment to any areas of outstanding natural beauty.

Kind regards,

Jack Wake-Walker

From: [REDACTED]

Sent: 17 February 2022 10:41

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objection to EA1N and EA2 East Suffolk

Dear Secretary of State,

I wish to object strongly to the above proposed construction.

This is in one of the most beautiful and untouched areas of Suffolk. It will destroy huge areas of viable agriculture and the associated natural habitats and wildlife. In addition it will severely harm the well established and diverse tourist industry of the area.

I fully accept the need for offshore wind-farms in the future but surely the power that is generated should be sent by under sea cable to a brown-field site of which there are many away from this beautiful area.

Such a solution would improve the Green credentials of the Government. It would blight the lives of those that have always lived and have cared for the area around Friston.

Yours sincerely

Jane S Davis

From: Melissa Embleton [REDACTED]
Sent: 18 February 2022 13:53
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Suffolk Coast Destruction

Please - I beg you not to allow this disruption and destruction of this unique part of coast land and reconsider your plans for the building of the Substation in Friston. Aldeburgh and the surrounding area was once a sleepy little fishing town but over the years it has become famous for its arts and culture partly due to Benjamin Brittain and his development of Snape Maltings and the internationally renowned Aldeburgh Festival.

Off the back of this a lot of private money has been invested in the town by individuals to encourage tourism including those who enjoy visiting the incredible natural birdlife at Minsmere Wildlife Sanctuary.

This area which has been selected for development for the Substation cannot have been thought through. Does anyone realise what they are about to destroy? Have you been to see it yourself. You have to. I guess its the East Coast and cheaper ? This is not a bunch of 'Nimbys' opposing Green Energy. Quite the reverse we in this area value and protect and enjoy all that nature can offer here and you just cannot understand what it would mean to take that away!

You are ripping the heart out of a small local community that is proud and willing to share all it has to offer. There must be a better choice.

Yours

Melissa Embleton

[REDACTED]

[REDACTED]

[REDACTED]

From: Charlotte Petsopoulos [REDACTED]
Sent: 18 February 2022 12:34
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Suffolk Under Threat

FOR THE ATTENTION OF THE RT HON KWASI KWATENG MP

PRESS RELEASE

We are strongly in favour of wind farms at sea, Renewable Energy and meeting the 2050 Net Zero target.

Suffolk Coastal communities are dismayed to discover that National Grid and ScottishPower could be given consent to wreck their beautiful heritage coast in the name of green energy.

Watch this short film to find out more: [REDACTED]

The largest onshore energy hub in the UK is anything but green.

Developers have chosen the cheapest and easiest location, using already outdated ideas, for their own benefit.

There is a better way forward, energy can be taken to a brownfield site, closer to London, where it is needed.

The imminent decision on EA1N and EA2 for three giant substations in Suffolk will open a portal to the UK's biggest energy hub, setting the precedent for the future of our National energy infrastructures.

We are calling for a split decision, to allow work on wind farms at sea to continue but pause and consider a better, greener solution for onshore substations at Friston.

Save Suffolk Coast and Heaths.

Yours respectfully,

Charlotte Petsopoulos

-----Original Message-----

From: India Dickinson [REDACTED]

Sent: 19 February 2022 15:20

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objection

Hi,

I am writing objecting to the on shore infrastructure for EA!N & EA2.

This will unnecessarily destroy this beautiful part of the east coast of Suffolk.

Please listen to the local community.

Many thanks,

India

From: [REDACTED]

Sent: 19 February 2022 11:44

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hoyles, Celia [REDACTED] Noss, Richard [REDACTED]

Subject: The energy coast - rather than an area of outstanding natural beauty -objections to the proposed massive construction works in East Suffolk

Dear Secretary of State

We write to object in the strongest possible terms to the plans to build the largest sub-station for off shore wind power in Friston, Suffolk.

The scheme is huge and would be under construction for up to eight years causing untold harm to a beautiful area of outstanding natural beauty.

It – together with the planned massive new power station at Sizewell C ---will destroy all that is special about this part of the East Suffolk Coast and cause untold harm to Aldeburgh, Thorpeness and Snape--- to the nature, the people and the culture.

There are alternatives. And we beg you to consider them before it is too late

Best wishes

Celia Hoyles and Richard Noss

[REDACTED]

-----Original Message-----

From: Jennie Foley [REDACTED]

Sent: 19 February 2022 10:21

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Jennie Foley Morris [REDACTED]; Anthony Morris

[REDACTED] Subject: Objecting to the on shore infrastructure for EA1N & EA2

To the Secretary of State.

We have been resident in Aldeburgh for the last 17 years and have seen its popularity as a holiday and visitor destination increase significantly during the last several years. Particularly during the last 2 years when travel abroad has been restricted.

Bringing the power lines on shore to a monstrously large substation will completely ruin the landscape, the peace and tranquility; the nature reserves and bird life that we all value so much.

The extra heavy duty traffic will also completely overwhelm the narrow roads and peaceful landscape.

It is a disaster for the area when there are brownfield sites nearer London that could be used without disturbing nature and populace.

We very strongly object to this plan on this part of the coast and have done so since it's inception.

PLEASE PLEASE reconsider the plans of where to bring wind energy onshore.

Yours Faithfully,

Jennifer Morris

[REDACTED]

-----Original Message-----

From: Jill Segal [REDACTED]

Sent: 19 February 2022 23:03

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Destruction of area of outstanding natural beauty on the East Suffolk coast

Dear Secretary of State and the Department for Business, Energy and Industrial Strategy

I have been a regular visitor to Aldeburgh, Snape and Thorpeness for the past 35 years. I am shocked and outraged at the proposals to desecrate acres and acres of countryside and heritage coastal towns in order to create monumentally large sub-stations at Friston.

Aldeburgh, Snape and Thorpeness have a rich cultural heritage in the UK and have been a significant draw to and revenue source for that part of East Suffolk. There are plenty of other areas in the South-East which do not have these outstanding features and could be the hub for these works and where the infrastructure is more fit for purpose.

I believe that the Department is misdirected to consider this development and needs to go back to the drawing board to find a more appropriate site.

Yours sincerely

Jill Segal

From: Susan Brinkhurst [REDACTED]
Sent: 19 February 2022 18:08
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Friston Suffolk Substation

Dear Kwasi Kwarteng,

Imagine a small, quiet village in rural Suffolk - with a unique style of architecture that is particular to low cost agricultural cottages and only found in a few villages in this area. Imagine a bluebell wood planted in the 1600's. Imagine a narrow country lane with marsh plants growing in ditches, wildlife inhabiting hedgerows and with the call of birds of prey above.
Now imagine all that gone - disappeared. Just like that.

Now imagine a concreted area - the size of nine football pitches. Imagine a huge construction rising higher than the local church spire. Imagine miles of hedging destroyed alongside roads and lanes to accommodate wide construction traffic. Imagine a dual carriageway running across the landscape, butting up to numerous AONB sites, making its way from the coast to inland villages.

Who would imagine that a signature at the bottom of a page could cause so much destruction, so much ruin to so many lives That a signature at the bottom of a page could wipe away so much history.

Now imagine who would think this is a wonderful idea. Such a brilliant idea that the same idea can be applied to other local villages around because the village of Friston is not alone.

On the back of these EAN1and EAN2 projects the National Grid propose to add five more sites like this. The destruction of five more rural villages, five more pockets of ancient woodlands, the destruction of miles of hedgerows, the destruction of hundreds of years of rural history in one of the most recognised beautiful areas of East Suffolk.

How much imagination do you have Kwasi Kwarteng?

PLEASE STOP THIS UN-JOINED UP GOLD RUSH MENTALITY OF DESTRUCTION FROM PRIVATE COMPANIES JUST TRAMPING THROUGH OUR COUNTRYSIDE WITH LITTLE CONCERN FOR THE PEOPLE, WILDLIFE, BEAUTY AND HISTORY.

yours in desperation,

S. Brinkhurst

[REDACTED]

From: [REDACTED]

Sent: 19 February 2022 14:53

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objections to the onshore infrastructure of EA1N and EA2

My wife and I have been resident in Aldeburgh for the last 17 years. She has already written her email of objection to the above proposed development under separate cover.

I am now writing to object to this proposed development in the strongest possible terms. I do not object to wind power, quite the opposite, but to the monstrous onshore development, for which permission is sought. This area is one of outstanding natural beauty, set in stunning countryside with bird and nature reserves, and enjoying great peace and tranquillity. Tourism is one of the main sources of income for the area, and the roads in the area, which are mostly narrow country roads and have not materially changed over the last 50 years, become very busy between spring and autumn each year.

My objections are on the following grounds:

1. The construction of such an enormous sub-station and the piping serving it, which will last several years, will ruin the landscape, peace and tranquillity of the area;
2. The roads are too small to be used regularly by the significant number of large lorries which will be using them to access the works. As a result, the roads will become clogged up during the construction period.
3. Once built the development will tower over the surrounding countryside and be a constant blight to it.
4. Tourism in the area will fall markedly, as residents and visitors will find it increasingly difficult to access the area.
5. The proposed development will have the effect of destroying the beauty and amenity of the area, whereas getting energy from renewable offshore sources should be achieved, as far as possible, without destroying the onshore habitat.
6. There are alternative brownfield sites on or near the coast of Essex, with easier access to the grid, where this onshore development could take place, without destroying nature or people's enjoyment of it.

Please do not grant permission to this proposed development.

Yours faithfully,

Anthony Morris



Virus-free. www.avg.com

From: [REDACTED]

Sent: 20 February 2022 15:20

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Friston sub-station

I am writing from my home in [REDACTED], Aldeburgh. The sub-station proposal, if carried out, will violate an area that is precious in the extreme both to us of East Anglia and to the whole Country. Please reject and rethink the proposal. Sir Stephen Oliver

-----Original Message-----

From: Olivia Pomp [REDACTED]

Sent: 20 February 2022 12:51

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objections to the onshore substation at Friston. Suffolk EAN &EA2

Dear Secretary of State,

I herewith object to the massive construction of acres of concrete in Suffolk to get the wind energy on land and to London.

I am very much in favour of green wind energy, but Suffolk and this particular part of Suffolk is so dependant on tourism and people enjoying this magical unspoilt coastline.

Aldeburgh is one of the most desirable holiday spots on the british coast, generating £40 Million pounds of revenue each year.

Hundreds of construction lorries going down the single road from the A12 to Aldeburgh for 10 years, creating pollution and delays, millions of kilos of concrete being used to build this substation, environmental disaster for all the birds and wild life in this area, all a nightmare, when there are better sites, closer to London to get the cabling from the sea onshore.

Please, please find another site and preserve this bit of amazingly beautiful Suffolk, which enables so many British and European friends to go and visit and enjoy.

Sincerely,

Olivia Pomp,

[REDACTED]

----- Original Message -----

From: Suffolk Energy Action Solutions - SEAS <suffolkenergyactionsolutions@gmail.com>;

Received: Mon Feb 21 2022 18:58:49 GMT+0000 (Greenwich Mean Time)

To: Enquiry Unit <enquiries@beis.gov.uk>; Minister Hands [REDACTED]; Enquiries @ BEIS <enquiries@beis.gov.uk>;

Subject: Invite to visit Suffolk Coastal the potential onshore site for EA1N and EA2

To: The Rt Hon Greg Hands MP, Minister of State (Minister for Business, Energy and Clean Growth) BEIS Dear Minister

We write to you urgently with regard to ScottishPower Renewables, East Anglia One North and East Anglia Two. A [short film](#) has been made by community groups and we recommend that you and your team **take five minutes to watch it** and understand why there is growing unease here in Suffolk Coastal.



We back The Rt Hon. Dr Therese Coffey's, call for a "split decision", whereby:

1. The offshore turbines are recommended for consent. This will mean that no time is wasted in respect of construction of the turbines.
2. 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 industrialised site. This is an opportunity for all stakeholders:

(i) An opportunity to choose a Grid connection on a brownfield or industrialised site which has the long-term capacity to act as a wind energy hub and thus facilitate the timely consenting not only of EA1N and EA2 but future projects planned to connect in the area, thus avoiding the costly and lengthy Judicial Review process as has been experienced in Norfolk.

(ii) An opportunity to give new strategic direction to the UK's offshore wind industry and pilot an East Anglian 'Pathfinder' project with integrated offshore solutions in order to minimise the number of connections onshore and thereby creating significant economies of scale and synergies. A major opportunity to continue to lead the world in terms of wind energy infrastructure.

(iii) An opportunity to nurture and grow the Suffolk Heritage Coast's nature based tourist economy.

(iv) An opportunity for a grid connection to be chosen in line with the government's environmental policy to protect Areas of Outstanding Natural Beauty.

(v) And ultimately the opportunity to accelerate the government's wind energy targets and enhance the UK's long term energy security which is paramount at this uncertain time. We urge you to visit and see the affected areas for yourself.

Yours sincerely,

Fiona Gilmore

On behalf of

Suffolk Energy Action Solutions (SEAS) Mob:





Yes to Offshore Wind Energy No to Onshore Plans

To prevent this email and other future SEAS emails from ending up in your junk or spam folder, please add our "From" address [REDACTED] to your address book.

From: Thomas Boyd-Bowman <[REDACTED]>
Sent: 22 February 2022 22:01
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: InfrastructurePlanning@communities.gov.uk; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; [REDACTED]; [REDACTED]; [REDACTED]; box.offshorecoord@nationalgrideso.com; [REDACTED]; offshore.coordination@ofgem.gov.uk; Offshore Coordination <offshore.coordination@beis.gov.uk>; [REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State,

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners. In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between

offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully,

Thomas Boyd-Bowman

From: Timothy Cutler [REDACTED]
Sent: 22 February 2022 06:11
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; "Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP" [REDACTED] The Rt Hon Michael Gove MP [REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>; OFGEM <offshore.coordination@ofgem.gov.uk>; National Grid ESO <box.offshorecoord@nationalgridESO.com>; NSIP Reform <InfrastructurePlanning@communities.gov.uk>; Suffolk County Councillor, Richard Rout [REDACTED] East Suffolk District Councillor, Craig Rivett [REDACTED] District Councillor, Russ Rainger [REDACTED] District Councillor Tom Daly [REDACTED] County Councillor, Andrew Reid [REDACTED]
Subject: EA1N and EA2

To: secretary.state@beis.gov.uk (The Rt Hon Kwasi Kwarteng MP, Secretary of State for the Department of Business, Energy and Industrial Strategy (BEIS)) Cc:

[REDACTED] (Minister of State for Energy, Clean Growth and Climate Change, The Rt Hon Greg Hands MP) [REDACTED] (Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP)

[REDACTED] (The Rt Hon Michael Gove MP)

offshore.coordination@beis.gov.uk (BEIS)

offshore.coordination@ofgem.gov.uk (OFGEM)

box.offshorecoord@nationalgridESO.com (National Grid ESO)

InfrastructurePlanning@communities.gov.uk (NSIP Reform)

[REDACTED] (Suffolk County Councillor, Richard

Rout) [REDACTED] (East Suffolk District Councillor, Craig

Rivett) [REDACTED] (District Councillor, Russ

Rainger) [REDACTED] (District Councillor Tom Daly)

[REDACTED] (County Councillor, Andrew Reid) Bcc:

info@suffolkenergyactionsolutions.co.uk (SEAS)

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications
East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

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To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and interconnectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

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onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.
There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'. Yours faithfully

Dr Timothy Cutler

[Redacted signature block]

From: [REDACTED]

Sent: 22 February 2022 21:35

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: National Grid and Scottish Power development in Suffolk

Dear Mr Kwarteng

I am writing to you as a long time resident of Thorpeness, Suffolk, to raise my objections to the three giant substations in Suffolk, and in particular the one in Friston.

I have no objection to the development of the wind farms off the Suffolk Coast, but am horrified at the destruction planned for green field sites in Suffolk. I am sure that the required infrastructure for bringing the energy onshore and to the users, could use brownfield sites nearer to London.

I hope that you will seriously consider this option.

Sincerely

John Latham

[REDACTED]
[REDACTED]
[REDACTED]

and

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: Annabel Matterson [REDACTED]
Sent: 22 February 2022 21:56
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED]; Offshore
Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;
[REDACTED];
[REDACTED];
[REDACTED];
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State,

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

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To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

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There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully,
Annabel Matterson

-----Original Message-----

From: Christopher Matthew [REDACTED]
Sent: 22 February 2022 11:48
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED]
Subject: Suffolk Under Threat

Dear Secretary of State, You will doubtless by now be aware of the short film, entitled SUFFOLK UNDER THREAT, which has horrified all of us who love the East Suffolk Coast and have homes there. Is there no possibility that the new wind farm could go ahead and that a decision on the giant sub-stations could be delayed beyond March 31st so that a better solution could be considered on a brownfield site which would not involve the appalling destruction of beautiful English countryside and, almost certainly the tourist industry that is so essential to the area.

To go ahead as planned would make not a jot of difference to your life, but it certainly would to countless Suffolk generations to come.

Yours, Christopher Matthew

From: [REDACTED]

Sent: 22 February 2022 09:48

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Greg (BEIS) [REDACTED]

[REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>;
info@nautilusinterconnector.com; [REDACTED]

Subject:

Dear Secretary of State,

I am writing to express my huge personal concerns with regards to the energy proposals on the Suffolk coast and to ask that you recommend a 'split decision' on Scottish Power Renewables EA1N & EA2 DCO's.

My family have lived on the East Suffolk coast for almost 80 years. It is a place of peace, solitude and incredible natural beauty which benefits from tourism from around the world. The threat to this by these proposals is unimaginable.

National Grid's Nautilus Interconnector seeks to exploit a Friston connection point which is not yet consented, or built. If a Friston grid connection is consented for EA1N & EA2 BEIS would facilitate a 'trojan horse' for Nautilus and numerous other projects all within a small 10km radius. Why are NGV Nautilus connection proposals in Suffolk based on using a Friston connection that hasn't yet been consented? How can National Grid or BEIS justify this?

The key issue at this stage is 'Cumulative Impact'. This small geographic area of East Suffolk cannot bear the brunt of the impact of multiple energy projects already in the public domain including:

1. Sizewell C [EDF]
2. EA1N wind farm and substation [Scottish Power]
3. EA2 windfarm and substation [Scottish Power]
4. Nautilus – plus onshore convertor station [NGV]
5. Eurolink – plus onshore convertor station [NGV]
6. UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
7. Five Estuaries [RWE] – proposed offshore wind farm extension
8. North Falls [SSE & RWE] – proposed offshore wind farm

Cumulative Impact has not been properly assessed in Scottish Power's EA1N & EA2 examinations, let alone in conjunction with the obvious impact of a Sizewell C construction or other proposed projects. In the absence of this assessment and given all the environmental damage these projects will do onshore, we ask that a split decision is made by yourself on East Anglia One North & East Anglia Two (EA1N & EA2). This is advocated by all community groups in the area and also supported by our local MP Therese Coffey (cc'd).

A split decision by the government gives the opportunity:

1. To fully evaluate the 'cumulative impact' of energy proposals and ensure Suffolk Heritage Coast's iconic but fragile nature-based culture and tourist economy is not damaged by numerous uncoordinated energy projects.
2. To choose a grid connection on a brownfield or pre-industrialised site which has the long-term capacity to act as a wind energy and inter-connection hub.
3. To ensure a grid connection is chosen in line with the government's own commitment to protect AONBs and provide more protection for the natural environment.

4. To facilitate timely consent for EA1N & EA2 to connect to the grid with least damaging development in allocation that could support additional projects like Nautilus, thereby avoiding the costly/lengthy prospect of Judicial Review as experienced in Norfolk.
5. To pilot an East Anglian 'Pathfinder' project to integrate offshore solutions to minimise disruption from multiple offshore to onshore grid connections.
6. To ensure the opportunity is taken now, to seek to get things right now.

Only if onshore solutions are found that minimise destruction of ecology (plant life and habitat), damage to the AONB, damage to tourism and damage to communities and ensuring connection via a brownfield/industrialised site could these projects contribute positively to climate change and support the government's stated intent in this regard. Failure to do this would mean 'so called carbon neutral energy' is being pursued at any cost and to the detriment of our AONB & countryside here on the Suffolk coast.

I therefore implore you to recommend a 'split decision' on Scottish Power Renewables EA1N & EA2 DCO's whereby:

1. The offshore turbine work could be consented so offshore turbine installation can commence without delay.
2. Onshore proposals are rejected, so full consideration can be given to find a less damaging grid connection solution, where adverse impacts can be minimised via connection at a brownfield or pre-industrialised site e.g. expansion of Bramford or repurposing the grid connection at Bradwell in Essex.

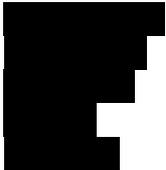
I hope that you will consider the above carefully and I look forward to receiving your response in due course.

Yours sincerely,

Alex

--

Alex Stanley,

A large black rectangular redaction box covering the signature and name of Alex Stanley.A black rectangular redaction box covering contact information, likely a phone number or email address.

-----Original Message-----

From: Alexander Winterbotham [REDACTED]
Sent: 21 February 2022 12:47
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Objection to EA1N and EA2 Offshore Windfarm Open Floor Hearings

Dear Sir/Madam,

I am writing to object in the strongest possible terms to the twin planned developments of EA1N and EA2 which would bring irreversible damage to this unique heritage landscape as well as endangering the delicate ornithological and marine wildlife of the area.

Yours Faithfully,

Alex Winterbotham
N1 London

From: Edward Greenwell [REDACTED]
Sent: 24 February 2022 16:32
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Edward Greenwell [REDACTED]
Subject: Switching Stations, Friston, Suffolk

Dear Secretary of State,

I am writing to urge you to follow your own good advice and insist that the giant Switching Station proposed for Friston in Suffolk be located on a brownfield site, closer to where the power is needed. I understand of course that it would be cheaper to bring the power from the proposed new windfarms in the North Sea onshore as close as possible to the windfarms themselves, but this is at great cost to other legitimate interests... principally tourism and the peaceful landscape of the Suffolk Coast and Heaths AONB. This is a case where other possibilities do exist, albeit they will cost more. There is the further problem with permitting this to go ahead, that of setting a precedent that will encourage other developers to believe that they can get away with ignoring local interests and national designations. I myself live about 10 miles from this proposal, so will not directly suffer. yours,
Edward Greenwell

[REDACTED]

-----Original Message-----

From: Fahie, Jonathan [REDACTED]

Sent: 25 February 2022 12:12

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED]

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

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To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

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In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her website.

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully

Jonathan Fahie
[REDACTED]

Business conducted on behalf of non-EEA domiciled clients is undertaken by Guy Carpenter & Company Limited.

Guy Carpenter & Company Limited is a company incorporated and registered in England and Wales with company number: 335308, whose registered office is at 1 Tower Place West, Tower Place, London, EC3R 5BU, United Kingdom.

From: [REDACTED]

Sent: 25 February 2022 15:20

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>;
[REDACTED]; offshorecoordination@ofgem.gov.uk;
box.offshorecoord@nationalgridESO.com;
InfrastructurePlanning@communities.gov.uk; [REDACTED]

Subject: EA One North (EA!N) and EATwo (EA2) Offshore Wind Applications

Dear Secretary of State

I understand we need cheaper and cleaner energy but there has to be another way to connect the offshore turbines to The National Grid.

This is a beautiful and unspoilt part of England that I have known all my life, although I have not always lived here. The National Grid and Scottish Power propose to desecrate this, obliterating AONBs and SSIs destroying everything in their path. This area depends on tourism. There will be nothing left to see or enjoy and our road infrastructure is not at all adequate.

As an inhabitant of Snape and having been brought up locally, I am devastated. How can VAST substations be placed near unspoilt villages and Listed buildings, and on agricultural land which is severely needed.

There are brownfield sites in the vicinity. Ex airfields spring to mind.

Clare Malim

[REDACTED]

From: [REDACTED]

Sent: 27 February 2022 12:21

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: National grid and Scottish Power Renewables plans

Dear Sir,

I would like to register my objection to the building of power connectors in and around the areas of East Suffolk where I live. (Snape, Sternfield, Knodishall and Aldringham. I am very concerned about the effects these building works will have on increased traffic, noise, loss of coastal habitats, loss of footpaths and a very damaging and detrimental effect on our green and beautiful county.

Diane Gibbins

From: [REDACTED]

Sent: 28 February 2022 11:51

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Suffolk Coastal Energy Projects

Dear Mr Kwarteng,

I would like to add my voice to those you are undoubtedly already aware of and urge you to refuse permission for the multiple energy project proposed for the Suffolk Coastal area.

The cumulative impact of the multiple projects proposed by National Grid and Scottish Power Renewables would have a catastrophic effect on the local environment and economy. Whilst I'm fully supportive of renewable energy there have to be alternatives to the current destructive proposals to get energy onshore.

Please listen to the voices of local residents and common sense by refusing the proposals as they stand.

Regards, **Steve**

Falvey [REDACTED]

[REDACTED]

From: CHRISTINE GRAY [REDACTED]
Sent: 28 February 2022 14:07
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Minister (BEIS) [REDACTED];
[REDACTED]; Offshore Coordination
<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;
box.offshorecoord@nationalgridESO.com; InfrastructurePlanning@communities.gov.uk;
[REDACTED]
[REDACTED]
Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia will play a significant part in achieving the UK's important 40GW wind power goals by 2030. At the same time, the government has made a commitment in the Energy White Paper 'Powering Our Net Zero Future' (pg 80), stating "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close. Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities would far outweigh the benefits of this particular onshore infrastructure plan.

These proposals relate to an area which is valued for its peaceful, inspiring landscape and wildlife. To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) in the midst of one of the UK's most fragile nature-based tourism destinations and an Area of Outstanding Natural Beauty, would lead to: the decimation of a thriving tourism economy, on which the Suffolk Heritage Coast depends; the destruction of wildlife and 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 and coastal communities whose lives would never be the same. It would be needless destruction, when it is clear that there are more appropriate brownfield or industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, I support, as a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this ‘split decision’ and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This ‘split decision’ would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud, and time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government’s Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government’s stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let’s not have wind energy at any price. Please recommend a ‘split decision’.

Yours faithfully

Christine Gray



From: [REDACTED]

Sent: 28 February 2022 11:54

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>;
[REDACTED] offshorecoordination@ofgem.gov.uk;
box.offshorecoord@nationalgridESO.com;
InfrastructurePlanning@communities.gov.uk; [REDACTED]

Subject: EA One North (EA!N) and EATwo (EA2) Offshore Wind Applications

Dear Secretary of State,

I understand that we need clean energy but strongly feel that there must be a less damaging way of connecting the offshore Turbines in Suffolk to the National Grid than through the exceptional country side cutting through Aldeburgh, Snape and the surrounding countryside to Friston Village.

Apart from the desecration of woodland and destruction of the wildlife habitat this area is of special interest with the Minsmere Bird Sanctuary and other havens for newts, water voles, otters and other venerable creatures.

Scottish Power and the National Grid propose to desecrate this part of the world obliterating AONB's and SSI's, destroying every thing in it's path.

This area depends largely on Tourism. If these plans go ahead there will be nothing left to see or enjoy! The roads are not equipped for the heavy vehicles that will be needed to build these vast substations near or inside small idyllic villages which contain listed buildings and on agricultural land which will be needed more and more in the future to produce food for the population.

Surely it would be better to use brownfield sites further down the coast such as disused air fields and the like. Please step in and change these plans.

Yours Sincerely,

Sara Hinton,

[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]

Sent: 27 February 2022 10:31

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; [REDACTED]

Subject: National Grid

Dear Sir/Madam

I ask you to please stop National Grid building Interconnectors in Suffolk Coastal area

The one proposed Next to Snape CHURCH is the size of 7 football pitches and over 24metres high. It will completely destroy a beautiful area and a Church that has stood for 700yrs.

Please consider the consequences of this I'll thought though project and Stop it We live in ANOB. Please don't allow this to kill all we have n

Yours faithfully

Bill Hough

[REDACTED]

From: Jane Stevensen [REDACTED]
Sent: 01 March 2022 10:27
To: KWARTENG, Kwasi <kwasi.kwarteng.mp@parliament.uk>
Subject: Objection to Scottish Power EA1N and EA2 development plans

Dear Secretary of State

I am writing to object extremely strongly to the proposed plans to develop the Scottish Power substation at Friston in Suffolk - EA1N & EA2.

The area is within an AONB, is home to numerous rare and protected species in marine and coastal ecosystems, and encompasses the historic towns and villages of Aldeburgh, Thorpeness and Snape.

The huge scale of the proposed infrastructure development is completely inappropriate in these settings and would destroy fragile ecosystems encompassing rare species in natural habitats and carbon sequestration systems which are vital in supporting the UK's net zero targets. The energy created by wind power is green and is to be supported with the development of the offshore wind farm, but bringing the power onshore must be re-thought urgently and this proposal must be rejected.

The area is a prime tourist destination and is economically dependent on its annual visitors. People are drawn to it because of its beauty, the remarkable wildlife and the artistic and cultural heritage. The road systems are predominantly rural and agricultural, and could not cope with the transport pressure, which would create enormous and devastating problems for businesses, local communities and visitors alike.

The background to this proposed development at the Friston site is also extremely questionable. There was a complete failure by Scottish Power to engage the residents of Friston, which meant the village residents had insufficient time to understand and provide informed opinion on proposals. Scottish Power's 'Statement of Community Consultation' 'SoCC' advertisements for Phase 3 failed to mention 'Onshore Development' requirements. One of the main onshore requirements for offshore wind projects is a need for a vast industrial sites on land with huge industrial buildings and large clusters of exposed electricity machinery.

The failure by the developer to engage the local community (ie the Friston residents) in early consultation meant that most villagers were unable to play a vital role in early stage consultations.

This is completely the wrong place to build a major industrial infrastructure development which would completely destroy one of the UK's most beautiful Areas of Outstanding Natural Beauty. This proposal must be rejected and a more appropriate brownfield site identified, and with appropriate consultation processes adhered to which has not been the case with the Friston Suffolk Substation proposal EA1N & EA2.

Kind regards
Jane Stevensen

[REDACTED]

From: Sharon Quilter [REDACTED]
Sent: 02 March 2022 10:18
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Scottish Power and National Grid

Sharon Quilter



2nd March 2022

Dear Rt Hon Kwasi Kwarteng

I am writing to voice my strong objection to the proposal of Scottish Power Renewables (SPR) and National Grid's destructive plans to build Interconnectors over 24 metres high sacrificing land at Snape, close to the 6th-century Anglo Saxon cemetery and home of Benjamin Britten's Snape Maltings Concert Hall.

A split decision is suggested, to *continue building wind turbines* but to **pivot to offshore integrated cabling to brownfield sites**.

National Grid want to dig cable trenches the width of the M25 from Thorpeness to Snape and there may be a **cable trench for each energy project over the next ten years** or more.

National Grid and Scottish Power Renewable plans threaten our communities and our way of life for the foreseeable future. These plans destroy precious coastal habitats, cutting off footpaths and routes to school. They threaten fragile ecosystems, diverse wildlife, Aldeburgh and the thriving local tourist economy.

Planned industrialisation on this scale is a national issue and anything but green. Please think carefully where the Interconnectors should go.

Yours sincerely,

Sharon Quilter

-----Original Message-----

From: Lynne Bellars [REDACTED]

Sent: 04 March 2022 12:30

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Suffolk Energy Action Solutions

Dear Sirs

Please act upon the above organisation's recommendations about proposed developments by Scottish Power in the Suffolk countryside.

Their deeply flawed plan continues the rush to destroy Britain. What a legacy.

L. Bellars

Sent from my iPhone

-----Original Message-----

From: Debra Daoutis [REDACTED]

Sent: 04 March 2022 16:37

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: [REDACTED] Offshore Coordination
<offshore.coordination@beis.gov.uk>; info@nautilusinterconnector.com;

[REDACTED]
Subject: Split decision required

Please consider a split decision for the Mass Energy Industrialisation planned for Suffolk Coast and Heath

Debra Daoutis

[REDACTED]

Sent from my iPhone

-----Original Message-----

From: Clare Gold [REDACTED]

Sent: 04 March 2022 12:28

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Objection to EA1N & EA2

Dear Secretary of State

I am writing as I strongly object to this proposal of an onshore substation.

This part of East Suffolk is in an area of outstanding natural beauty and this proposal would devastate the countryside here. This area is not meant for industrial use. If it is built, it would cause permanent damage and this beautiful landscape and coast line would be destroyed and lost forever.

Traffic has increased considerably over the last few years and the roads are already very busy. The roads and infrastructure do not exist here for this sort of industrial development.

There are other more suitable brownfield sites for the power from these wind farms to be brought on land nearer to London.

Please, please don't allow this proposal to go ahead here.

Yours sincerely

Clare Gold.

Sent from my iPad

-----Original Message-----

From: Clare Greenwell [REDACTED]

Sent: 04 March 2022 15:00

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Suffolk under threat

Please urgently reconsider the site at Friston for the substations and consider existing Brown field sites closer to

London. The road infrastructure in Suffolk is totally unsuitable and unsustainable for heavy traffic from the A12. As locals we queue and dice with death the Aldeburgh turn off from the A12, The junction at Snape church onto the A1094 is often backed up and a presently a 10 minute wait at peak times and increases in the summer with heavy holiday traffic. Have you actually visited this area? It's Suffolks pride and joy an AONB, please don't wreck it and cause huge disruption to our tourist industry and our daily lives. Yours
Clare Greenwell

Sent from my iPhone

From: [REDACTED]

Sent: 04 March 2022 17:51

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: National Grid & Scottish Power Renewable Plans

Dear Rt. Hon. Kwasi Kwarteng,

I would ask you to do everything in your power to stop the National Grid & Scottish Power Renewables plans to construct four new interconnectors across fields from Snape to Sternfield, or from Knodishall to Aldringham.

This is an area of outstanding natural beauty. It will destroy precious coastal habitats; cut off footpaths and routes to schools, significantly raise pollution from the extra traffic and congestion to already heavily travelled roads. It will decimate tourism, which in turn will threaten our local businesses and livelihoods. Pollution from noise, air and light will be unbearable.

Yours sincerely,

Richard, Sally and Louise Webb

Sent from [Mail](#) for Windows

From: FRANCES HEAZELL [REDACTED]

Sent: 07 March 2022 14:19

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Minister (BEIS) [REDACTED]

[REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>;

offshore.coordination@ofgem.gov.uk; box.offshorecoord@nationalgridESO.com;

InfrastructurePlanning@communities.gov.uk; [REDACTED]

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I

wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. **Please recommend a 'split decision'**.

This is what it means to me:

My family have lived on Church Common in Snape since the 1950's. This is my home (in the true sense of the word), my sanctuary and a place I love with all my heart. It is a very very special place to me. It is no exaggeration to say that the proposed development will utterly destroy this stunningly beautiful little corner of England. I totally understand that recent developments in Russia and Ukraine will bring considerable concerns about stability of power generation in the future and I support offshore wind generation in principle but only when suitable brownfield sites can be identified for the significant onshore infrastructure needed. What is the point of the AONB designation if energy companies are allowed to destroy them because it is cheaper or more convenient than the perfectly viable brownfield alternatives? Please, please, please send SPR away to "think again" and recommend a split decision on this potentially devastating proposal.

Yours faithfully

Victoria Heazell



-----Original Message-----

From: Sophie Marple [REDACTED]

Sent: 07 March 2022 19:43

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Stop Scottish Power construction

Dear Mr Kwarteng

I'm writing to ask that the Scottish power plan for a substation in Friston, Suffolk is stopped. I'm a climate campaigner and philanthropist and am very positive about wind power. However it is ludicrous to pick a site in an area of outstanding natural beauty and fragile ecosystems to locate this huge piece of infrastructure. The impact will be massively negative. I live very close to friston and can list multiple reasons why it should not go ahead - I'm sure you've heard all of them. This is not nimbyism, this is protecting a beautiful area for generations to come. There are alternative brownfield sites that can be used. And there are options to build the substation at sea. Please reconsider and save a beautiful part of the world, my home.

Regards

Sophie

Sent from my iPhone

-----Original Message-----

From: Nick Matthew [REDACTED]

Sent: 07 March 2022 16:42

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng, Minister (Private Office) <Minister.Kwarteng@beis.gov.uk>

Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; COFFEY, Therese

[REDACTED] Offshore Coordination

<offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk;

box.offshorecoord@nationalgrideso.com; InfrastructurePlanning@communities.gov.uk;

[REDACTED]
Subject: Split decision recommendation - EA1N & EA2

Dear Sir,

I realise that a decision on this is imminent and I would like to recommend a split decision over the applications for Scottish Power Renewables (SPR) East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind projects so that:

- (1) The offshore turbines are recommended for consent.
- (2) 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 industrialised site.

In the wake of Covid and the effect that it has had on the economy, and the now ever pressing energy concerns brought about by the Russian invasion of Ukraine, I can see that there must be immense pressure for the project to be approved.

However, what is the point of approving a green energy project if the infrastructure to support it fundamentally undermines it.

The Suffolk coast must be protected, as indeed should all of the wonderful Suffolk landscape inland between the coast and the A12. It is utterly unique and if this onshore proposal goes ahead in its current form it will be destroyed for no other reason than that it was expedient.

We live on the coast and the turbines out to sea are now a common and welcome addition to the horizon. However, as I am sure you must agree, enormous substations erected in unspoilt areas of outstanding natural beauty should not be allowed to happen, ever. They should be erected in existing brownfield and industrialised sites.

I would ask that you kindly respond by return to this letter to confirm that it has been received and my views registered.

Many thanks.

Very best wishes,
Nicholas Matthew

Resident, Thorpeness

-----Original Message-----

From: William Matthew [REDACTED]
Sent: 07 March 2022 16:15
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>; Kwarteng, Minister (Private Office) <Minister.Kwarteng@beis.gov.uk>
Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; COFFEY, Therese [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; offshore.coordination@ofgem.gov.uk; box.offshorecoord@nationalgrideso.com <box.offshorecoord@nationalgridESO.com>; InfrastructurePlanning@communities.gov.uk; [REDACTED]
[REDACTED]
Subject: Split decision recommendation - EA1N & EA2
Importance: High

Dear Sir,

I realise that a decision on this is imminent and I would like to recommend a split decision over the applications for Scottish Power Renewables (SPR) East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind projects so that:

- (1) The offshore turbines are recommended for consent.
- (2) 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 industrialised site.

In the wake of Covid and the effect that it has had on the economy, and the now ever pressing energy concerns brought about by the Russian invasion of Ukraine, I can see that there must be immense pressure for the project to be approved.

However, what is the point of approving a green energy project if the infrastructure to support it fundamentally undermines it.

The Suffolk coast must be protected, as indeed should all of the wonderful Suffolk landscape inland between the coast and the A12. It is utterly unique and if this onshore proposal goes ahead in its current form it will be destroyed for no other reason than that it was expedient.

We live on the coast and the turbines out to sea are now a common and welcome addition to the horizon. However, as I am sure you must agree, enormous substations erected in unspoilt areas of outstanding natural beauty should not be allowed to happen, ever. They should be erected in existing brownfield and industrialised sites.

I would ask that you kindly respond by return to this letter to confirm that it has been received and my views registered.

Many thanks.

Yours sincerely,
William Matthew

Resident, Thorpeness
[REDACTED]

-----Original Message-----

From: Angus Gribbon [REDACTED]

Sent: 07 March 2022 15:35

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Shore infrastructure for EAIN & EA2. - Friston Suffolk

I have never complained publically before but I am most distressed by the proposed Scottish Power infrastructure as above. Such a large building would ruin this quiet corner of England. The area is already suffering from the nearby Sizewell C project. The small Suffolk roads will really not be able to cope with two mega building projects. It would surely be fairer to build this extra building somewhere less damaging.

In the hope that my views will be taken seriously to preserve this wonderful part of England.

Kind regards

Angus Gribbon

Sent from my iPhone

From: CAMILLA HAYCOCK [REDACTED]

Sent: 08 March 2022 13:34

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: OBJECTION TO THE NATIONAL GRID/SCOTTISH POWER PLANS FOR SNAPE, SUFFOLK

To the Rt Hon Kwasi Kwarteng

I write to express my deep concern about and objection to the plans by the National Grid and Scottish Power to destroy the countryside adjacent to my home at Snape, Suffolk, with a huge onshore interconnector. I understand the need for renewable power – I have solar panels and a ground source heat pump – especially when the energy supplies can be so impacted by the whims of one mad man in the Kremlin, BUT I don't understand why it needs to be in protected heathland countryside when there are perfectly good alternative brownfield sites that could be used instead. The view from my home and my holiday let next door, which currently looks over to Snape church, will be decimated by the monstrosity that Scottish Power and the National Grid are proposing to build just next to and behind the church. The untouched environment and the wildlife are what make this part of the Suffolk coast so attractive to visitors and tourists. If it is turned into an industrial wasteland, the tourist industry will die as will many businesses in this area, not least my own small holiday let.

PLEASE consider that the people of Suffolk Coastal are OPPOSED to all this development on their green and pleasant land and build it somewhere else.

Thank you

Camilla Haycock

[REDACTED]

-----Original Message-----

From: Charles Mackesy [REDACTED]

Sent: 08 March 2022 09:18

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: No to EA1N and EA2 at Friston

To The Rt. Hon. Kwasi Kwarteng

I hope you are well in these very odd times.

I am writing in an alarmed state because I've heard truly alarming news that there are plans to place at least 8 towering industrial structures covering 100 acres in and around Friston and Snape in Suffolk.

It's a beautiful medieval part of rural England.

The roads will be paralysed for a decade.

Historic sites will be desecrated.

Intolerable noise pollution, light polluting and air pollution will result.

I live here.

Why on earth are energy hubs not being placed in Brownfield sites?

It makes no sense at all.

The tourist industry will suffer enormously as well as wildlife. I despair at the decisions being made here.

Thank you

Charlie Mackesy

Sent from my iPhone

From: WHITTAKER, Rigby (SOLE BAY H C) [REDACTED]
Sent: 07 March 2022 14:04
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: Hands, Greg (BEIS) [REDACTED]

[REDACTED] Offshore Coordination <offshore.coordination@beis.gov.uk>;

Subject: Suffolk Energy Initiatives

Dear Mr Kwarteng

I write to express my concern at the planned developments affecting a small part of Suffolk in a designated area of outstanding natural beauty (AONB). This is not about Nimbyism or lacking vision on my part, I am a supporter of the use of the offshore windfarms as a source of natural energy which makes excellent use of this country's natural resources, unlike the appalling, ruinously expensive and outdated plans for Sizewell, which recent events have served to illustrate the folly and risks associated with nuclear energy, to say nothing of the legacy issues, costs, ownership concerns and decades of disruption.

This is about securing and safeguarding a recognised AONB for future generations. We have a responsibility to maintain these spaces, which have incalculable benefit for all, as once lost they will never be restored. We cannot blindly continue to justify such destruction on the grounds of supposed collective interest, as doing so would change the very complexion of the countryside that is loved by all and what makes this county special.

Suffolk coastal communities are being subjected to yet another consultation for NGVs Nautilus Interconnector following Scottish Power's EA1N and EA2 and EDF's SZC. All this is too much for one small community to bear.

National Grids Nautilus Interconnector seeks to exploit a Friston connection point which is not yet consented, or built. If a Friston grid connection is consented for EA1N & EA2 BEIS would facilitate a 'trojan horse' for Nautilus and numerous other projects all within a small 10km radius – How can National Grid or BEIS justify this?

The key issue at this stage is 'Cumulative Impact'. This small geographic area of East Suffolk cannot bear the brunt of the impact of multiple energy projects already in the public domain including:

1. Sizewell C [EDF]
2. EA1N windfarm and substation [Scottish Power]
3. EA2 windfarm and substation [Scottish Power]
4. Nautilus – plus onshore convertor station [NGV]
5. Eurolink – plus onshore convertor station [NGV]
6. UK Interconnectors SCD1 & SCD2 [NG] – proposed UK Grid connectors
7. Five Estuaries [RWE] – proposed offshore windfarm extension
8. North Falls [SSE & RWE] – proposed offshore windfarm

Cumulative Impact has not been properly assessed in Scottish Power's EA1N & EA2 examinations, let alone in conjunction with the obvious impact of a Sizewell C construction or other proposed projects. In the absence of this assessment and given all the environmental damage these projects will do onshore, I ask you to consider a split decision on East Anglia One North & East Anglia Two (EA1N & EA2). This is advocated by all community groups in the area and also supported by the local MP Therese Coffey.

A SPLIT DECISION GIVES THE GOVERNMENT OPPORTUNITY:

1. To fully evaluate 'cumulative impact' of energy proposals and ensure Suffolk Heritage Coast's iconic but fragile nature-based culture and tourist economy is not damaged by numerous uncoordinated energy projects;
2. To choose a grid connection on a brownfield or pre-industrialised site which has the long-term capacity to act as a wind energy and inter-connection hub;
3. To ensure a grid connection is chosen in line with the government's own commitment to protect AONBs and provide more protection for the natural environment;
4. To facilitate timely consent for EA1N & EA2 to connect to the grid with least damaging development in a location that could support additional projects like Nautilus, whereby avoiding the costly/lengthy prospect of Judicial Review as experienced in Norfolk;
5. To pilot an East Anglian 'Pathfinder' project to integrate offshore solutions to minimise disruption from multiple offshore to onshore grid connections;
6. To ensure the opportunity is taken now, to seek to get things right now.

Only if onshore solutions are found that minimise destruction of ecology (plant life and habitat), damage to the AONB, damage to tourism and damage to communities and ensuring connection via a brownfield/industrialised site could these projects contribute positively to climate change and support the governments stated intent in this regard.

I very much hope you will hear these concerns and act to protect this world renowned AONB.

Yours sincerely

Rigby Whittaker

Resident of Orford, Suffolk.

** *****

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and

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From: louise fincham [REDACTED]
Sent: 09 March 2022 13:28
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED]
Subject: Scottish Power Renewables (SPR) EA1N and EA2

Dear Secretary of State,

You are about to deliver your decision on SPR's EA1N and EA2 offshore windfarm plans. Of course our attention is focused on the current desperate situation in Ukraine. Not only are we concerned for the poor citizens of Ukraine and surrounding countries but also for the implications for our own country. In assessing SPR/National Grid plans there is no doubt a temptation to say that we must crash ahead in a rush to become more self sufficient in energy production; but a bad plan is still a bad plan and you know that this is a bad plan. Decisions will be bogged down by legal challenges and protracted planning hearings because there is so much powerful objection locally and increasingly nationally as well. A decision in favour of SPR/National Grid in this case will in fact risk delaying projects, not speeding them up.

What has changed in the last few weeks is that we have all come to realise that as well as the need to be more self sufficient in the way we produce energy, we also need to protect our food production. Ukraine was a valuable source of grain and crops, the breadbasket of Europe, but we cannot expect to be able to import grain from Ukraine any time soon. Here in East Suffolk we have some of the most productive and valuable arable land in the country, and this is the land that SPR/National Grid want to pour concrete onto. Hundreds of acres of crop growing land will be needlessly taken out of production by these schemes and the others that would undoubtedly be bolted on to them. We know that National Grid has a "plan B" and has other sites in mind should consent not be given to these plans. They admitted they would rather work on greenfield sites because it is cheaper for them to do so. This is unacceptable, we need energy but we also need food, we can have both. You simply need to consent the offshore element of these plans and then tell National Grid to use a brownfield site to build their infrastructure and make their grid connection to London and the South East where the energy is needed, please leave East Suffolk to do what it does best, producing high quality food and supporting a thriving tourist economy for the benefit of all of us.

Louise Fincham

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Offshore Coordination](#)
Cc: [REDACTED] [Offshore Coordination;](#)
[offshore.coordination@ofgem.gov.uk;](#) [box.offshorecoord@nationalgrid-ESO.com;](#) [InfrastructurePlanning@communities.gov.uk;](#)
[REDACTED]
Subject: info@suffolkenergyactionsolutions.co.uk
Date: 09 March 2022 11:00:22

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

I was born in East Suffolk, have known this area for 78 years, and have lived here fulltime for the last 20 years. While the text of the email below follows a template, it speaks my mind in every word. If the Nautilus Interconnector goes ahead as suggested, it will destroy an irreplaceable historic and natural environment.

East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

I was pleased to read and hear Dr Therese Coffey advocating this 'split decision' and her own expression of this approach as presented at the Hearings, can be found at this link to her [website](#).

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for

offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard.

There is time. We have eight years to get this right before 2030. Let not time and targets become our enemy. Let's not have wind energy at any price. Please recommend a 'split decision'.

Yours faithfully
Lucy Pollard



From: Giles Webster [REDACTED]
Sent: 09 March 2022 12:22
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: COFFEY, Therese [REDACTED]
Subject: Mass Energy Industrialisation Planned for Suffolk Coast and Heaths

Dear Secretary of State,

I am all for renewable energy and offshore turbines are as good an answer as any for providing some of our country's needs. Other sources must also be tapped so that we are self reliant. This is essential as recent events make clear.

However, care must be taken not to needlessly devastate an enormous amount our precious countryside and fragile coastline. The proposed Friston Substation energy hub together with the Nautilus Interconnector onshore siting with associated cable routes will do precisely that. The thought of it makes one want to weep. There are other options, eg Felixstowe, Harwich, Lowestoft, which have huge industrial areas and are far more suitable. These and other similar locations should be the ones to choose from.

Kind regards,

Giles Webster

[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]
To: secretary.state@beis.gov.uk
Cc: [East Anglia ONE North](#); [East Anglia Two](#); [REDACTED]
Subject: East Anglia One North and East Anglia Two
Date: 15 March 2022 09:04:21

Dear Right Honourable Kwasi Kwarteng, Minister of State for the Department of Business, Energy and Industrial Strategy

**Reference: PINS Ref: EA1N: EN010077 and EA2: EN010078
Ref ID No 20023260 and 20023261**

At this point in time, for so many reasons, there is probably nothing more important than the design and architecture of our energy systems. The energy policies you are now formulating will define this nation, its future and every aspect of our lives. These policies will certainly take into account technological, scientific, economical and international considerations but they must also exude the ethos of the future we want.

In a few days you will be casting your judgement on the applications for the EA1N and EA2 off shore wind farms. You have been well informed that the onshore components of these applications will cause devastation to what is now a thriving, culturally and environmentally rich area of East Anglia. You know that National Grid wants to further develop this area into a great energy hub that will for the foreseeable future turn this part of the country into an industrial waste land. Don't let National Grid bully you into doing something that you know is fundamentally wrong. Don't take rash decisions because of the situation in the Ukraine.

Please, for the sake of the future and the legacy you will be leaving behind, take a split decision on these applications by refusing the onshore component of EA1N and EA2. Please plan for the future in a considered manor by insisting that brown field and industrial sites be utilised for the onshore requirements for off shore wind power.

Yours sincerely,

Mya Manakides

-----Original Message-----

From: Frances [REDACTED]

Sent: 15 March 2022 07:59

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Scottish power

The proposed construction at Friston in Suffolk is inappropriate and a destructive piece of lazy 'planning'. Taking advantage of a sparsely populated region of the country to impose this concrete carbuncle is a sad reflection of the disregard central government has for the nature of our country.

A brownfield site already serviced by suitable transport links would be the better alternative, and I hope and trust that this construction taking over 100 acres of farmland is abandoned.

Please do not ignore the wishes of the residents in the area and of the many thousands of visitors who enjoy the proven benefits of unspoilt countryside.

Frances Hopewell-Smith

From: Jenny Newhouse [REDACTED]
Sent: 15 March 2022 13:19
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Subject: Objection to off shore wind farm off the Suffolk coast

Dear Sirs,

Yet again I will try and raise my voice to protest about the desecration of the sea and landscape around Aldeburgh Minsmere Thorpeness and Southwold.

I have attended explanation sessions about the different forms of proposed energy organised by EDF and Sizewell for many years. No one listens to the fact that your lack of joined up thinking will desecrate one of the most beautiful areas of protected land in the country.

These are some of the issues, none answered.

- There are two huge forms of energy collection proposed in one area from wind and nuclear power and two large storage building complexes are to be built covering a vast area of land. If you must have two sources of energy, which I dispute, is it not possible to combine the storage and pipe transportation to minimise the damage?
- There will be no tourist trade left in this area so any advantage from new jobs will be outweighed by the loss of the jobs already existing. The noise, visual pollution, loss of wild life and desecration of the coast will ensure that tourists will go elsewhere.
- The damage to marine life has not been properly analysed; I questioned one of the 'marine biologists' representing you about the banks holding the sea bass off shore and he had never heard of them. I understand that the wind turbines are to be drilled into the seabed, causing damage and permanent reverberation for decades - what will happen when they become obsolete? At least you could put the turbines onto floating platforms which would cause less damage.

As this beautiful area is already occupied by Sizewell and what will probably be Sizewell three, please consider moving the wind farm to a different part of the windy east coast. Also please reconsider scale, a few smaller wind farms which need less supporting infrastructure and be nearer the place that they are to serve would be less visually destructive and more cost effective. By the time this huge scheme is constructed it will be vastly over budget and new ideas will have overtaken it and we will just be left with the devastation caused.

If I'm lucky you may acknowledge receipt of this letter. What I do know is that you won't answer any questions raised and you will never listen to any views except your own. It is a soul destroying thing trying to protect something so precious and beautiful when the young men defending it want to know how I will power my smart fridge if it doesn't exist.

Yours sincerely

Jenny Newhouse

From: [REDACTED]

Sent: 16 March 2022 17:17

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>; "Suffolk Coastal MP, The Rt Hon Dr Thérèse Coffey MP"

[REDACTED] The Rt Hon Michael Gove MP [REDACTED]
Offshore Coordination <offshore.coordination@beis.gov.uk>; OFGEM <offshore.coordination@ofgem.gov.uk>;

National Grid ESO <box.offshorecoord@nationalgridESO.com>; NSIP Reform

<InfrastructurePlanning@communities.gov.uk>; Suffolk County Councillor, Richard Rout

[REDACTED]; East Suffolk District Councillor, Craig Rivett [REDACTED]

District Councillor, Russ Rainger [REDACTED] District Councillor Tom Daly

[REDACTED]; County Councillor, Andrew Reid [REDACTED]

Subject: East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Applications East Anglia will play a significant part in achieving the UK's 40GW wind power goals by 2030. I endorse these important goals. At the same time, the government has stated on page 80 of the Energy White Paper 'Powering Our Net Zero Future', "to minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid". I wholeheartedly support this intention.

As you are aware, the PINS Examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have drawn to a close.

Over the course of the Examinations, it became increasingly apparent that the severe adverse impacts of these projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

To locate an Energy Hub, possibly the biggest of its kind in the UK (currently seven substations and inter-connectors are being proposed for Friston) 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 industrialised sites such as Bradwell or Grain, which are better aligned with government policy. The recent historic judgement by The Hon. Mr Justice Holgate to overturn and quash the consent for the Norfolk Vanguard Wind Farm project on the basis that cumulative impact was not taken into account has significant bearing on the legality of the Examinations for EA1N and EA2 at which SPR has to date refused to present the cumulative impact of these known additional projects to the Planning Examiners.

In order not to delay the offshore turbines, which I endorse, I am proposing a constructive way forward, a 'split decision' between offshore and onshore elements, where the offshore wind turbines are given consent, but the onshore works are rejected.

As a resident living in the Suffolk AONB and a constituent of MP Dr Therese Coffey, I was pleased to read and hear that she is advocating this 'split decision'.

This 'split decision' would buy time. Time for the UK government to take the lead and bring together the key actors to approve the new regulatory change needed for offshore integrated solutions. Time to allow EA1N and EA2 to benefit from the BEIS Review and to become flagship pathfinder projects of which we can all be proud. And finally, time to bring these projects to fruition in a way which minimises their greenhouse gas emissions in line with the government's Ten Point Plan. Only if the onshore infrastructure minimises the destruction of our environment by connecting to the grid at a brownfield or industrialised site, whilst minimising onshore cable corridors, can these projects contribute positively to climate change and support the Government's stated intent in this regard. In summary I would ask you to recommend a 'split decision' so that:

The offshore turbines are recommended for consent.

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 industrialised site.

Yours faithfully

Graham Hanson

From: [REDACTED]
To: [Secretary Of State \(Kwasi Kwarteng\)](#)
Cc: minister.state@beis.go.uk; [REDACTED]; [Offshore Coordination](#);
info@nautilusinterconnector.com; [REDACTED]
Subject: A further note to the Secretary of State regarding Scottish Power's application for EA1N and EA2 (EN 010077/8)
Date: 17 March 2022 14:31:17

IP Numbers: 20023188 and 20023189

Dear Secretary of State,

EA1N and EA2

Please forgive me troubling you once more in the week before your decision is announced, but I just wanted to add one thing to the points that I've already made during the Examination and more recently.

It is this – I read this week that one of the many effects of the Russia-Ukraine crisis is the large reduction in the availability of grain in the UK – wheat and maize – due to the large amount that we import from Russia and Ukraine in normal times.

As Britain seeks to be more self-sufficient regarding energy it is important not to forget that it also needs to be more self-sufficient regarding food. It seems to me to be counter-productive to build an 'energy hub' on many acres of productive farmland, as is currently proposed, when it would be possible to build this hub on a brownfield site or an already existing energy complex, thus saving valuable farmland for feeding the nation.

So for this additional reason, I would urge you to consent the off-shore aspects of the plan, but reject the onshore ones in favour of a brownfield site.

Yours faithfully,

Alan Bullard

[REDACTED]

From: Crispin Truman [REDACTED]
Sent: 18 March 2022 09:44
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: BEIS Correspondence <BEIScorrespondence@beis.gov.uk>; Townend, James (Communications) [REDACTED]; Tom Fyans [REDACTED] Anastasia Zawierucha [REDACTED]
Sarah McMonagle [REDACTED]
Subject: RE: East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind applications

Dear Secretary of State
Please find attached a letter regarding the DCO/NSIP examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications.
Yours sincerely
Crispin Truman

Crispin Truman | CEO

[REDACTED]
[REDACTED]
[REDACTED]

This email is confidential and may also be legally privileged. If you have received this email in error, please notify the sender immediately by reply and delete it from your system. Views expressed in this email are those of the sender and may not necessarily reflect the views of the Campaign to Protect Rural England (CPRE). This email and any attachments have been virus checked. CPRE is registered as a charity (No. 1089685) and company (No. 04302973) in England. Registered Office: 15-21 Provost Street, London N1 7NH Website [REDACTED]
[REDACTED]



CPRE The countryside charity
21 Provost Street
London, N1 7QU
T: 020 7981 2800

Rt Hon Kwasi Kwarteng MP
Secretary of State for Business, Energy and Industrial Strategy
Department for Business, Energy and Industrial Strategy
1 Victoria Street
London SW1H 0ET

17 March 2021

Dear Secretary of State,

RE: East Anglia One North (EA1N) and East Anglia Two (EA2) offshore wind applications

As you know, the DCO/NSIP examinations relating to ScottishPower Renewables (SPR) EA1N and EA2 wind power applications have now closed. We understand your decision is due shortly.

The Suffolk Preservation Society (SPS, which represents CPRE in Suffolk) submitted a written representation to the examinations expressing significant concerns regarding the impact of the selected onshore substation site at Friston on historic landscape character and the setting of local heritage assets. They considered that the scale and character of the substation proposals is incapable of mitigation.

The SPS was also concerned that the potential cumulative impacts of the seven identified connection points (EA1(N), EA2, NG, Galloper, Greater Gabbard extensions, SCD1 and SCD2), singly or in combination, had not been properly assessed. You will obviously be aware of the successful judicial review in respect of the Norfolk Vanguard Wind Farm project where cumulative impact was not taken into account. In our view, that remains a point at issue in the EA1N and EA2 examinations.

Both the SPS and CPRE acknowledge the important contribution that renewable energy will make towards securing the nation's future energy needs and fully accept that this forms part of the Government's low carbon energy strategy. In that respect, we support the wind farm arrays being consented but would wish the current proposals for the substation ('energy hub') to be refused and taken back to the drawing board to find alternative and less damaging sites and/or solutions.

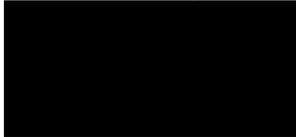
We say this in the context of the current direction of travel of electricity transmission infrastructure delivery where impacts in sensitive local coastal areas are further minimised through offshore and onshore co-ordination, as endorsed by the Prime Minister at PMQs on 19 May 2021, when he firmly backed the need for an offshore transmission grid, saying '...it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency.'

We strongly endorse the co-ordinated approach that the government has been proposing through its Offshore Transmission Network Review (OTNR), which would result in a halving of onshore impacts (on landscape, communities and biodiversity) and very significant savings in capital

expenditure. Offshore and onshore co-ordination therefore is a huge 'win-win' opportunity and should be implemented as soon as possible as one of the cheapest 'no regret' options. This should also be enabled through clear guidance in the revised National Policy Statements for energy, which we recently commented on.

Now is therefore the time to change direction in relation to current ('in flight') infrastructure projects, including the connection aspects of EA1N and EA2, which we urge you to refuse. Such a decision not only makes economic sense but also will signal the need to make this vital step change in future grid connections and allow measures to combat the climate emergency to be pursued at pace.

Yours sincerely,



Crispin Truman OBE
Chief Executive

From: [REDACTED]
To: [Energy Infrastructure Planning](#); [East Anglia Two](#); [East Anglia ONE North](#)
Cc: [REDACTED]
Subject: FW: SPR - Outline Code of Construction Practice
Date: 20 March 2022 14:33:38
Attachments: [Works Schedule for Substation Site11.docx](#)

For the attention of Gareth Leigh/Energy Infrastructure Planning

On 31st January 2022 the Applicants responded to the SoS' questions of 20th December 2021 and included a much revised Outline Code of Construction Practice, which included a completely new drainage plan for the substation sites in Friston during construction. The SOS will appreciate that flooding in Friston is already a serious problem and that Suffolk County Council has not come to an agreement with the Applicants on the mitigation required in relation to the flood risk posed to the village during construction.

Given the extensive revision of the OCOCOP, stakeholders expected to be given the opportunity to make representations on both the text and the revised plan and that SCC as LLFA would also be given a similar opportunity. There are some significant inconsistencies between this new plan and the plan submitted by the Applicants at Deadline 12. Both versions can be seen at the end of these links to the OCOCOP:-

Deadline 12:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-005292-8.1%20EA2%20Outline%20Code%20of%20Construction%20Practice.pdf>

Plan submitted on 31/1/22:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-009890-8.1%20EA2%20Outline%20Code%20of%20Construction%20Practice.pdf>

On the recent plan prepared by AECOM, the volume of the four curved basins is shown to be **15,600** cubic M. No figure was given on the D12 plan but we have carefully scaled the proposed 10 basins and assumed a depth of 1M, with the total proposed volume amounting to **28,700** cubic M. How can the Applicants justify such a huge reduction in storage of nearly 50%? At D12 the Applicants were also arguing that the basins may need to be deeper than 1M to accommodate the total volume of surface water.

There are further inconsistencies in the calculation of impermeable areas. In the latest version of the OCOCOP on page 59, there is a new table giving the areas for the various areas totalling 209,234sqM (compared to 210,800sqM at D12). However paragraph 176 on page 57 states that the works to be accommodated are Works Nos 30, 31, 34, 38, 41 and 42. I attach a list of works taken from the draft DCO and Works Plan, Sheet 7

(<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-005173-2.3.2%20EA2%20Works%20Plan.pdf>) which describes all the works taking place on the substation site. The following works appear not to have been accounted for in the recent OCOCOP:-

Work No 26 – cables and haul road connecting into the substations (this is a major omission and the area lies on a known source of flooding)

Work No 29 – ecological mitigation

Work No 32 – connections/cable ducts from the SPR substations to the NG substation

Work No 33 – landscaping works including bunding, drainage, formation of footpaths etc

Work No 39 & 40 – realignment works to the overhead pylons

Work No 43 – temporary working areas for the re-alignment works

To this list we would add the areas for temporary storage of topsoil and subsoil. Further surely any area on the substation site which has been stripped of vegetation and/or compacted presents an additional flood risk? The latest plan also shows a significant reduction in the areas occupied by the Cable Sealing Ends but no explanation is given. Given the complexity of the substation projects and the likelihood of all areas within the Order Limits being put to use, then the impermeable areas need to be re-considered/re-calculated.

Given the decision date is now so close, how does BEIS intend to deal with these very important issues which put the lives and homes of residents of Friston at serious risk? We note that there has been a significant amount of consideration given to the Red Throated Diver recently but please give the same consideration to the plight of those who live in close proximity to the substation site and are under serious threat of a much increased flood risk.

Kind regards

Ian & Mary Shipman

[REDACTED]

Refs: 20024363, 2002 4361, 2002 3179 and 2002 3176

Works Schedule for Substation Site

Work No. 26 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and up to ten cable ducts laid underground from Work No. 23 to Work No. 31 and crossing Snape Road (B1069) together with the construction of a haul road and access and the formation of a new access at Snape Road (B1069).

Work No. 29 — permanent ecological mitigation works in accordance with the ecological management plan and associated access.

Work No. 30 — a new onshore substation at Grove Wood, Friston. 31

Work No. 31 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and up to ten cable ducts laid underground from Work No. 26 to Work No. 30 together with temporary construction consolidation sites, construction of a haul road, access and extension of permanent access comprised within Work No. 34.

Work No. 32 — a connection consisting of up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and up to ten cable ducts laid underground from Work No. 30 to Work No. 41 including a connection above ground and electrical engineering works within the national grid substation comprised within Work No. 41;

Work No. 33 — landscaping works including bunding and planting together with drainage works, sustainable drainage system ponds, surface water management systems, formation of footpaths and access.

Work No. 34 — formation of a new permanent access road from the B1121 north of Kiln Lane to the onshore substation and national grid substation including vegetation clearance on the eastern side of the road. Highway modifications and traffic management measure

Work No. 38 — up to three cable sealing end compounds, one of which may include circuit breakers, comprising an electrical compound with electrical equipment and overhead line gantries to allow the connection of Work No. 41 to the overhead lines comprised within Work No. 39 together with cables connecting the national grid substation to the cable sealing ends, extension of the permanent access comprised within Work No. 34 and works to the overhead line pylons.

Work No. 39 — replacement, upgrade and realignment works to the overhead line pylons in the vicinity of Work No. 38 together with up to one new additional overhead line pylon to the north west of the national grid substation comprised within Work No. 41.

Work No. 40 — temporary realignment works to the overhead line pylons in the vicinity of Work No. 38.

and associated development within the meaning of section 115(2) of the 2008 Act comprising—

Work No. 41 — a new national grid substation to the north west of Work No. 30 at Grove Wood, Friston and extension of permanent access comprised within Work No. 34.

Work No. 42 — temporary construction consolidation sites, access and extension of permanent access comprised within Work No. 34.

Work No. 43 — temporary working areas for the purposes of constructing Work Nos. 39 and 40 including access.

From: Cindy Shelley [REDACTED]
Sent: 21 March 2022 08:49
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: coordination@beis.gov.uk; [REDACTED]; Hands,
Greg (BEIS) [REDACTED]
[REDACTED] coordination@beis.gov.uk; info@nautilusinterconnector.com;
Subject: Very Serious

Dear Kwasi Kwarteng,

re **Scottish Power's EA1N & EA2**

I am begging you to please stop the destruction of Suffolk Coast. You know as well as I do that we have a duty to preserve the countryside as much as possible for future generations. The cumulative damage on this outstanding natural environment can never be reversed and it makes me cry to think of the lives it will ruin. There are people here who have fished and farmed through generations who will have their whole lives and heritage ruined by this insane proposal. Please please consider using a brownfield site and not make a decision based on money and greed that will ruin a countryside and a generation.

Yours sincerely

Cindy Shelley

THE ALDEBURGH SOCIETY
Registered Charity Number 262239

The Rt Hon Kwasi Kwarteng
Secretary of State for Business, Energy and Industrial Strategy
1 Victoria Street
LONDON SW1H 0ET

15 March 2022

**OFFSHORE WINDFARMS EAST ANGLIA ONE NORTH
AND EAST ANGLIA TWO**

With the deadline approaching for your decision on the DCO applications by Scottish Power Renewables, I wish to underline to you the strong opposition of the Aldeburgh Society to the proposed onshore installations in the vicinity of our historic East Suffolk coastal town. As the local civic society, we are deeply concerned by the threat which these proposals pose to our inhabitants, our environment, our economy, indeed to our way of life.

We played an active part in the Planning Inspectorate Examination of these applications and I do not intend to repeat here all the arguments we have put forward to SPR's proposals. We are confident that the Inspectorate will have reflected the very strong and well-founded local opposition in its report to you. We strongly support the development of offshore wind energy generation in the right circumstances, and we expect renewables to make a major and growing contribution in the progress towards net zero. We also recognise, now more than ever, the need to secure reliable energy supplies.

The core of our objection is threefold:

1. That this is a nationally protected Area of Outstanding Natural Beauty whose character would be irreparably damaged by the proposed large industrial structures and associated cable corridors;
2. That the construction and operation of these installations would cause serious traffic congestion on unsuitable roads; air, light and noise pollution; and damage to the year-round visitor economy of our town and the surrounding area;

3. That SPR's proposed installations are seen by National Grid companies as the focus for a series of up to six additional onshore cable connections with extensive industrial infrastructure, the scope of which has not been publicly explained or subjected to proper examination.

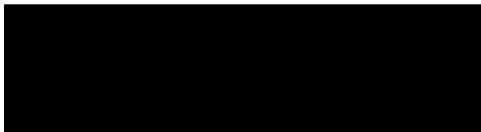
None of the above needs to happen. Viable means exist to create undersea cable connections from a series of windfarms and bring the power they generate together onshore to a brownfield site closer to where the power is actually needed. It is beyond our remit to set out specific proposals for such an approach but we are confident that the studies underway in your Department will demonstrate its viability.

Accordingly, we urge you to opt for a split decision, whereby the offshore proposals are granted consent (subject to relevant stakeholders' acceptance) while the onshore proposals are rejected and referred for re-consideration by means of a less environmentally and socially damaging solution.

We cannot believe that your Government, with its strong commitment to a green agenda, would wish to clear the way for seismic damage to a fragile and highly valued stretch of coastline when a viable alternative approach is achievable.

I urge you, on behalf of our community in Aldeburgh and East Suffolk, to heed the strong concerns which we and many others have voiced over the negative aspects of offshore wind generation, and to make a future-proof decision on these applications.

Yours sincerely

A solid black rectangular box redacting the signature of Katherine Mackie.

Katherine Mackie

Chair

To: The Secretary of State BEIS

Rt Hon Mr Kwasi Kwarteng MP
Department of Business Energy & Industrial Strategy
1 Victoria Street
London SW1H 0ET

Date 21/3/2022

Dear Mr Kwarteng

I wish to record my **objections to the EA1N and EA2 plans for onshore cabling and connection**

This will seriously impact an AONB and countryside immediately adjacent. By definition, this is an area of outstanding beauty and of international importance in terms of migratory birds - surely this cannot be ignored

Works associated with this and similar projects will be occurring during similar timescales as the Sizewell C project - disruption including traffic congestion will be a major burden on all parties. There are multiple adverse impacts including that on tourism

I fully support offshore wind generation and interconnectivity with continental Europe, but the onshore elements should instead be routed via brownfield or industrialised sites. I await keenly the Holistic Network Design (HND) in preparation by National Grid ESO which will give a broad context for planning this vital UK infrastructure

CALL TO ACTION

I call for a split decision:-

- 1) The **offshore turbines are consented**
- 2) The **onshore infrastructure is rejected** in favour of full consideration of alternate locations with lower adverse impacts, including brownfield and industrialised sites

Yours faithfully

[Redacted signature block]

Signature(s) _____

Name(s) [Redacted] [Redacted] _____

Address [Redacted] _____

[Redacted] _____

[Redacted] [Redacted] _____

From: [REDACTED]

Sent: 22 March 2022 17:00

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk

Subject: Fwd: Invitation from Secretary of State to comment on EA1N and EA2 as per letter 2 November 2021
UPDATE

Dear Secretary of State

Further to my submission on 30 November 2021 (below) calling for a **split decision**, a number of additional energy projects impacting this area have come to our attention, for example Sea Link which is mooted to "connect at Friston"

There is wholesale support for a **split decision** in the Snape parish. We have formed a group, **Snape Energy Action**, as a sub-group of Suffolk Energy Action Solutions (**SEAS**). We have been gaining support and I will be posting additional signed letters from residents. At present, I have **6 signed letters** (wording as below), and expect more in the next few days

We strongly support Offshore Wind but reject that the ill-considered and uncoordinated offshore infrastructure proposals, given that better alternatives exist

Please make a split decision YES to Offshore Wind but NO to current Onshore Infrastructure proposals

Yours sincerely

David McKenna

Co-ordinator, Snape Energy Group

----- Original Message -----

From: "David McKenna" [REDACTED]

To: eastangliaonenorth@planninginspectorate.gov.uk; eastangliatwo@planninginspectorate.gov.uk Sent: Tuesday, 30 Nov, 21 At 09:02

Subject: Invitation from Secretary of State to comment on EA1N and EA2 as per letter 2 November 2021

To: The Secretary of State BEIS

I wish to record my **objections to the EA1N and EA2 plans for onshore cabling and connection**

This will seriously impact an AONB and countryside immediately adjacent. By definition, this is an area of outstanding beauty and of international importance in terms of migratory birds - surely this cannot be ignored

Works associated with this and similar projects will be occurring during similar timescales as the Sizewell C project - disruption including traffic congestion will be a major burden on all parties. There are multiple adverse impacts including that on tourism

I fully support offshore wind generation and interconnectivity with continental Europe, but the onshore elements should instead be routed via brownfield or industrialised sites. I await keenly the Holistic Network Design (HND) in preparation by National Grid ESO which will give a broad context for planning this vital UK infrastructure

CALL TO ACTION

I call for a split decision:-

- 1) The **offshore turbines are consented**
- 2) The **onshore infrastructure is rejected** in favour of full consideration of alternate locations with lower adverse impacts, including brownfield and industrialised sites

Yours faithfully

David F McKenna

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: sally miles [REDACTED]
Sent: 24 March 2022 11:02
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: [REDACTED]; Hands, Minister (BEIS) <Minister.Hands@beis.gov.uk>;
[REDACTED]
Subject: EA1N and EA2

Dear Secretary of state,

With the decision on SPR's EA1N and EA2 now imminent and the current situation in Ukraine and its implications for energy, it must be tempting to rush ahead with SPR's plans, but please consider the detrimental effects this will have.

Food security has been an issue that has bothered me for some time, with government seeming to find little importance in agricultural self-sufficiency. The situation with grain shortages as a result of the war in Ukraine should act as a warning not to squander prime agricultural land, such as we have in Suffolk, which is about to be covered in concrete by first SPR's EA1N and EA2 at Friston and then, as a direct result, by National Grid's multiple projects at Snape. Since the number of wind farms at sea are set to increase then it follows that even more agricultural land will be viewed as easy pickings for the energy companies.

Coupled with the threat to East Suffolk's most successful tourist trade and its cultural life, for example at Benjamin Britten's Snape Maltings and much more, surely land fall at a brownfield site is preferable to this sort of destruction.

The vast majority of residents of East Suffolk are in favour of wind farms at sea, but not at the expense of the countryside and their way of life. We are asking you to consider a split decision to allow for continued building of the wind farms at sea but to allow time for proper decision making about integrated cabling at sea with brownfield landfalls for substations and interconnectors etc., such as we can see has successfully happened on the continent.

It is not too late to reconsider, and given the level of determined opposition to the current proposals it may well save time and money and be politically expedient to do so.

Yours sincerely,

Sally Sturridge.

Sent from Windows Mail

From: [REDACTED]

Sent: 25 March 2022 18:01

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject:

I support wind power but it makes no sense to cause irreversible damage to the natural environment of Suffolk coast and heath which includes sites of international and national nature conservation importance, and rare and protected species. In addition local communities will suffer losses in tourism and their small business and owned homes will devalue or become unsaleable. Unsuitable country lanes and small trunk roads will be blocked by HGV flow for many years, Suffolk landscape and night skies will be changed for ever. Please reconsider and stop the planning permission for Scottish Power Renewables offshore wind energy to be connected onto Suffolk Coast.

Regards Dan Millis

[REDACTED]

From: [REDACTED]

Sent: 28 March 2022 12:37

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Letter re Objection to proposed Energy Hub nr Snape Village, Suffolk

Dear Sir

Please find attached, my letter of **objection** to the proposed creation of an enormous energy hub using interconnectors near to Snape Village, Suffolk.

Whilst I am in favour of green energy and fully support the proposed offshore wind farm locally, the size and creation of the energy hub would result in significant and lasting damage to this beautiful part of the Suffolk countryside. Yours sincerely,

Elaine Hawes

Local resident living only five minutes from Snape.

Sent from [Mail](#) for Windows

ELAINE HAWES

28 MARCH 2022

**Rt Hon Kwasi Kwarteng
Secretary of State for Business Energy and Industrial Strategy
1 Victoria Street
London SW1H 0ET**

Dear Sir

**RE: OPPOSITION TO INTERCONNECTOR ENERGY HUB NR SNAPE
VILLAGE, SUFFOLK**

I am writing to you to express my total opposition to the proposed energy hub siting nr to Snape Village, Suffolk. Whilst being fully in favour of renewable energy (I have solar panels myself) and in full support of the offshore proposed wind farm near Sizewell, the onshore proposed energy hub is totally in the wrong place.

I object to the proposed hub on the grounds of the local landscape and wildlife destruction during construction and resulting permanent visual and aesthetic changes that would result in this area of national beauty. As an area which depends heavily upon tourist income and currently offers a tranquil and unspoilt haven for people to both live and holiday, the enormous scale of the proposed hub would change the nature of this area for ever.

I would ask you to explore the alternative brown field sites which are available, and to focus all developments required to support ongoing energy need into areas where there is much less damage likely to be caused to this existing sensitive area.

I fully support the view of my local MP Dr Therese Coffey in asking you to make a spilt decision over the proposals, giving a 'YES' to the offshore windfarm proposal and a 'NO' to the siting of an energy hub in Snape.

Yours sincerely

Elaine Hawes

Elaine Hawes
Local Resident

Cc MP Dr Therese Coffey

-----Original Message-----

From: michael laschet [REDACTED]

Sent: 28 March 2022 10:16

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Scottish Power Renewables(SCR) EA1N and EA2

Dear Secretary of State,

We welcome the clean, renewable energy of the off-shore wind farms EA1N and EA2.

We deplore bringing the energy ashore on Greenfield Sites on the east coast, especially here in Suffolk.

There are Brownfield Sites available closer to London and the South East where the energy is needed. They will facilitate better the connection of all the other energy projects in the pipeline as well as EA1N and EA2 to the National Grid.

The current plan of Scottish Power and National Grid to use Greenfield Sites in east Suffolk will ruin Tourism in our area, destroy irreplaceable flora and fauna habitats and concrete over productive arable land.

The war in the Ukraine will deprive us of grain from the Breadbasket of Europe and severely deplete our food supplies. We must be self-sufficient in food as well as fuel if we are to be a truly independent country.

Renewable energy via Brownfield Sites is the way to do it right.

Chris and Mike Laschet

[REDACTED]

From: [REDACTED]

Sent: 27 March 2022 17:04

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Cc: minister.state@beis.gov.uk, [REDACTED] Offshore Coordination
<offshore.coordination@beis.gov.uk>; COFFEY Therese [REDACTED]

Subject: Scottish Power Renewables Offshore Windfarm connections in East Suffolk
To the Rt Hon Kwasi Karteng MP, BEIS Secretary of State

Dear Secretary of State

With the announcement this morning that the government will take a 20 per cent stake in Sizewell C it is obvious the nuclear plant will be consented. If you allow the onshore infrastructure plans of SPR to proceed with substations at Friston the cumulative impact on this area of east Suffolk will have begun.

The multiple other projects planned for connection to the national grid will be permitted and the area lost to industrialisation. Hundreds of acres of good arable land, much needed as a result of the Ukraine invasion by Russia, will be covered in concrete, and thousands more acres of supposedly protected and government revered countryside will be devastated. The destruction will continue for the next 15 years.

Government needs new energy supplies quickly, wind power is there to be harnessed and can be, rapidly and efficiently from EA1N and EA2 wind farms if you determine that SPR and the other projects must connect to the national grid at a brownfield site. If you permit the onshore SPR infrastructure plans there will be huge delays to the delivery of wind power from EA1N and EA2 wind farms. Legal and local opposition will ensure that the onshore infrastructure will be delayed, possibly for years.

We urge you once again to deliver a split decision on these wind farms, allowing the turbines to be built but refusing the onshore plans and insisting on connection to the national grid on a brownfield site further south where the power is needed. Please respect our lives, livelihoods and beautiful countryside and allow east Suffolk to flourish in its food production and appreciation by tourists.

Yours sincerely

Louise & Derek Chadwick

[REDACTED]

From: Graham Bagnall [REDACTED]

Sent: 29 March 2022 09:08

To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>

Subject: Split Decision

Dear Sir,

With Regard to EA1N/2 all projects must be:

planned not only with coordination but with sensitivity to the environment and the communities that live within it. If you have the people behind the development it will run smoothly . As Seas have said all along

there are

alternative solutions. These must be looked at as Scottish Power have been evasive in their true plans.

Listen to the People . The term of your government depend on it .

Regards ,Graham Bagnall

Aldeburgh Resident

Sent from my iPhone Graham Bagnall

From: Fiona Gilmore [REDACTED]
Sent: 28 March 2022 16:40
To: Secretary Of State (Kwasi Kwarteng) <Secretary.State@beis.gov.uk>
Cc: minister.state@beis.gov.uk; [REDACTED]; Offshore Coordination <offshore.coordination@beis.gov.uk>; Thérèse Coffey MP
[REDACTED] **Subject:** ScottishPower EA1N/ EA2 and a way forward

Dear Secretary of State

EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO

Your decision on these projects is imminent.

In the current crisis of energy security, we cannot afford not to accelerate the development of renewables. East Anglia is proud to play a major role in offshore wind energy generation for the UK as a whole. More ambitious GW targets are now being considered as part of the Offshore Transmission Network Review (OTNR) HND and even more reason to make the step change to a new world of master planning, spatial strategy and new technology advances to facilitate these more ambitious objectives.

SEAS has consistently opposed these current ill-conceived plans for ScottishPower EA1N and EA2. They are the tip of the iceberg and if given consent, they act as a magnet for what will become the largest energy infrastructure in the U.K. with the concomitant results, transforming the popular Heritage Coast into a Concrete Coast, over 12 to 15 years of intense construction.

Our positive way forward is set out in these six points:

1. Split Decision. No delay.

We urge you to consider the merits of a split decision:

To give consent to the construction of the offshore wind turbines without delay.

To pause the onshore development to give time for alternative solutions to be fully appraised and a better solution chosen at a brownfield site.

A split decision is viable because the developers can be reassured that there will be connection points chosen in the next 18 months and guaranteed. The BEIS OTNR Anticipatory Investment Scheme can be introduced to give incentives to first stage developers, sharing the risk with second stage developers.

A precedent for a split decision is established in the Triton Knoll, Lincolnshire case study in 2013.

2. New world of energy infrastructure is more urgently needed in the context of Energy Security and Food Security. Radical rethink is crucial.

Successive Ministers and Secretaries of State have hesitated to adopt new world thinking. Proposals for greater use of offshore integration have been presented over the last 15 years and more. These have been ignored and at worse dismissed by National Grid, a company more committed to its shareholders than to UK plc and infrastructure modernisation.

Denmark and Belgium are just two North Sea countries who are powering ahead with innovative solutions at sea including Modular Offshore Grids(MOGs) , floating and static platforms and artificial islands. We talked with Elia's CEO in 2020 and we know that these solutions are viable now. Elia launched its MOG programme in 2020.

The old world thinking was based on a simple question:

"Where is the closest place on land to my wind farms where I can connect to the Grid?"

Hence, the advent of spaghetti connections and crazy criss- crossing of the East Anglian

countryside with little thought for communities and countryside. In the recent PINS Examinations there was an extraordinary admission from one of the SPR project managers: “ *we simply look to drop our boxes on land as close to the offshore wind farms as possible* ” and more recently from John Pettigrew, National Grid’s CEO to a local farmer: “ *we like greenfield sites, they’re the cheapest, easiest for us*”. This old world thinking is clearly outdated and highly irresponsible. It is the outcome from a developer-led culture where short-term thinking was encouraged. Local communities have been beset with the threats of such developments for years and already, it has taken a significant toll in terms of mental health, well-being and sense of fairness.

Yet, the new world beckons. The technology is already available.

The new questions are very different to the old question.

Question One:

“Where is the electricity generated?”

Question Two:

“Where is the electricity needed?”

Offshore solutions become instantly more attractive. Adopting MOGs, electricity can be transmitted in fewer sub-sea arterial cables having been pooled offshore at platforms and then connected at brownfield sites where large concrete monoliths can be constructed with less environmental and economic harm to local populations. If the goal is now to generate 50GWs of wind energy by 2030, the cost of upgrading pylons at Bradwell and Grain become insignificant in the context of these greater ambitions.

We no longer look at Maps of East Suffolk when considering these questions. We now look at Maps of the North Sea, the ***Wind Energy Sea***, and study the brownfield and pre-industrialised sites ripe for regeneration. East Suffolk is in fact a ***deviation to the West***.

Why deviate from the North-South line through the North Sea from wind farms to central Hubs located close to where the power is required. It’s a triangular deviation and irrelevant in this new world. This wind farm electricity is for use in London and the South East, where there are dense populations, unlike East Suffolk.

There is too much electricity planned for it all to be carried via coastal Suffolk and Bramford. For safety and security reasons it does not make sense to carry over 35% UK’s electricity via this line. It is the wrong plan and wrong environment. Quite simply, use a new North-South subsea cable grid system to carry this electricity.

3. Current plans produce anything but green energy.

Environmental destruction over 12 to 15 years of construction bear consequences not only for wildlife corridors and rare habitats, but for community members who depend on Nature for their tourists and visitors. This area accounts for 5% of the UK’s lowland heathland and 1% of the planet’s. The planned M25 width cable trenches gouge through the Sandlings AONB and SSSI. Otters, bats, water voles, great-crested newts, pure red deer and nightingales are some of the threatened priority species and even more at risk given these cable trench plans. Everything is connected. If we destroy what we hold most dear, we throw it away for ever. Once it’s gone, it’s gone. Green is not green if National Grid destroys the Heritage Coast. We liken these plans to the worst excesses of the industrial revolution where there was an irrational rush to capitalise on the new boom and wrong plans were implemented without any justification. National Grid should come clean about these plans. BEIS OTNR is taking advice from consultants other than National Grid. This is essential if we are going to benefit from independent, objective advice on the best way forward. Benchmarking Elia and Tennet plans would inspire the strategic thinking because it is more holistic and environmentally

responsible. The UK is short-term in its infrastructure planning and it's simply greenwashing to pretend that these plans are in any sense green.

4. No meaningful jobs. Tourism erosion. Farming erosion.

Let's be clear. There are no permanent jobs associated with these eight substations and connectors projects now planned for this tiny six square mile radius area.

In fact according to an independent research study conducted in 2020 by the Destination Management Office (DMO), 15% jobs in hospitality will disappear each year of construction. That's a loss of around £40m per annum. Tourists will no longer choose Aldeburgh, Thorpeness and Snape for their short breaks and holidays. They will choose more attractive places where there is tranquillity, serenity and beauty. Why on earth would anyone wish to stay in a location where mass industrialisation is taking place and where the rural lanes are gridlocked? If given consent, EA1N and EA2 are the harbinger of the largest energy hub in the UK; a magnet for interconnector projects - Eurolink, Nautilus, SEAL and three other substations - SCD2, North Falls and Five Estuaries. These connectors will be 24 m high and cover 12 acres each. In totality these eight projects will concrete over enormous swathes of prime farming land which we cannot afford to throw away, the size of the Vatican City or 120 acres in total. That doesn't include the 12 miles of multiple cable trenches.

5. Sizewell C is coming. Cumulative impact was not fully assessed.

We have heard in the last few days that the Government is taking a 20% stake in Sizewell C. It is evident that the unproven EDF twin reactor plan will be given consent. The cumulative adverse impact of these eight wind energy onshore projects in addition to Sizewell C was never fully assessed in any Examination. The burden is too great for this tiny Nature-based tourism area. These consultations and Examinations are becoming a sham, a complete farce for local

Communities and indeed, the Planning Inspectorate themselves. If the advice against these plans go unheeded by the Secretary of State, we can be in no doubt that our democratic rights are dwindling.

6. Last chance. Legacy for future generations. A national issue.

Tim Moxham is one of SEAS young activists and in a recent interview he stated that these plans are clearly not supported by him or his peer group. He describes these plans as "*heart-breaking*". To vandalise and pillage the countryside and farming land in Zimbabwe or in past times in Malaysia was described as "land grab" and slated by local communities.

What we are witnessing here is a land grab by foreign-owned developers endorsed by the Government using zero emission goals as the excuse for this senseless rampage.

This is our one chance to get this done right.

Let's do something that makes us proud of our legacy. Do we want this on our conscience? Surely we wish to tell our children and future generations that we tried our best and we found a way through this nightmare.

We will with a heavy heart go to Judicial Review if these plans are given consent.

That will delay things further. What a wasted opportunity that will be.

We ask you to consider in the context of all these macro factors a more considered master plan where EA1N and EA2 become the first of the OTNR Early Opportunity Pathfinder projects, a beacon for the future, for other areas to follow and as our legacy for Tim and his generation. Yours sincerely

Fiona Gilmore

Founder of SEAS





----- Original Message -----

From: Suffolk Energy Action Solutions - SEAS <suffolkenergyactionsolutions@gmail.com>;

Received: Tue Mar 29 2022 18:46:02 GMT+0100 (British Summer Time)

To: Secretary of State (Kwasi Kwarteng) <secretary.state@beis.gov.uk>; Enquiry Unit <enquiries@beis.gov.uk>; Enquiries @ BEIS <enquiries@beis.gov.uk>;

Cc: George Eustice MP [REDACTED] Minister Hands [REDACTED]; InfrastructurePlanning@communities.gov.uk; box.OffshoreCoord@nationalgrideso.com; Offshore.Coordination@ofgem.gov.uk; offshore.coordination@beis.gov.uk; [REDACTED]; [REDACTED];

Subject: EA1N/EA2 - Now is not the time for a knee jerk political decision in the name of Energy Security.

Dear Secretary of State

East Anglia One North (EA1N) and East Anglia Two (EA2)

We write ahead of your imminent decision on the above offshore wind projects.

In the current crisis of energy security, now more than ever, we need offshore wind.

With up to 30% of the UK's energy requirements being planned off the coast of East Anglia it is of paramount importance to get ScottishPower's (SPR) projects right from the start so that they act as a solid basis for future projects connecting in East Anglia prior to 2030.

The Offshore Transmission Network (OTN) Review's objectives include not only the integration of future projects but that these projects find "... **the appropriate balance between environmental, social and economic costs** ...". SPR's projects do none of the above, instead they are seeking radial connections to the grid through AONB land. What's more, the true cumulative impact of the advent of Sizewell C coupled with these eight substations and interconnector projects now planned for the Friston area has never been fully assessed in the PINS Examinations. This six square mile area cannot carry the burden of such intense industrialisation. It's time that the Government faced up to this irreversible adverse impact.

As things stand, if these projects are consented the very foundation of offshore wind in East Anglia, from which future projects are set to pivot will be outdated and needlessly destructive.

For this reason we, along with the Rt Hon Dr Therese Coffey MP, support a Split Decision, whereby the offshore turbines are consented but the onshore plans are refused in favour of more appropriate integrated solutions which utilise brownfield sites and reduce their impact on the local environment and economy.

Now is not the time for a knee jerk political decision in the name of Energy Security.

Now is the time for a bold far-sighted decision. It is an opportunity for EA1N/2 to become Pathfinder Projects, embrace integration with other projects in the area and fulfil the objectives of this Government's OTN Review. **We are proud of our renewables at sea.** We are very proud of them but there are better solutions for onshoring the energy for the long term success of the offshore wind energy off the coast of East Anglia, for the environment and also for the local economy.

Yours sincerely

Fiona Gilmore

Glynis Robertson

Jenny Wells

--

Suffolk Energy Action Solutions (SEAS)

[REDACTED]

[REDACTED]

Yes to Offshore Wind Energy

No to Onshore Plans

To prevent this email and other [REDACTED] ur junk or spam folder, please add our "From" address [REDACTED] to your address book.

To Unsubscribe please email [REDACTED]



To: The Secretary of State BEIS

Rt Hon Mr Kwasi Kwarteng MP
Department of Business Energy & Industrial Strategy
1 Victoria Street
London SW1H 0ET

Date 23 MAR 2022

Dear Mr Kwarteng

I wish to record my **objections to the EA1N and EA2 plans for onshore cabling and connection**

This will seriously impact an AONB and countryside immediately adjacent. By definition, this is an area of outstanding beauty and of international importance in terms of migratory birds - surely this cannot be ignored

Works associated with this and similar projects will be occurring during similar timescales as the Sizewell C project - disruption including traffic congestion will be a major burden on all parties. There are multiple adverse impacts including that on tourism

I fully support offshore wind generation and interconnectivity with continental Europe, but the onshore elements should instead be routed via brownfield or industrialised sites. I await keenly the Holistic Network Design (HND) in preparation by National Grid ESO which will give a broad context for planning this vital UK infrastructure

CALL TO ACTION

I call for a split decision:-

- 1) **The offshore turbines are consented**
- 2) **The onshore infrastructure is rejected** in favour of full consideration of alternate locations with lower adverse impacts, including brownfield and industrialised sites

Yours faithfully

Signature(s)

Name(s)

Address

[Redacted signature and name area]

[Redacted address area]

To

The Rt Hon Kwasi Kwarteng, Secretary of State, BEIS

The Rt Hon Greg Hands MP Minister of State (Minister for Energy, Clean Growth and Climate Change)

The BEIS Energy Infrastructure Planning Team

Re. Offshore Wind Farms (EAN1, EA2)

Sizewell C

Dr Gillian Horrocks

IP 20024567, 20024566, (EAN1, EA2) 20026614 (Sizewell C)

Dear Ministers

The war in Ukraine has greatly focused the national mind on the need for Britain to become self-sufficient in energy and in food production, as Lord Deben illustrated on 26-3-22.

For the UK, this may well mean a hasty increase in the development of renewables, energy storage, alternative fuels and nuclear. We may come to regret this haste.

The IEA identifies risk for renewable energy only in sourcing the raw materials for the zero-emission economy. But Ukraine shows us that the IEA has neglected to seriously consider defence and military risks.

According to Suffolk County Council, my part of Suffolk - just a few square miles - is proposed to provide more than 30% of the nation's energy, through renewable and nuclear facilities. Even if this figure proves optimistic, there will be an unprecedented and cumulative concentration of nationally important infrastructure in a very small coastal area.

It also means that the nation's energy production will become exceptionally vulnerable to hostile action: a few distribution pylons downed, or a transmission interlink damaged, or a nuclear reactor controlled by a hostile power - all easy targets concentrated in one conveniently small area - would bring the nation to its knees.

Since the shock of '9-11', the fragility of the nation's infrastructure should have been sharply thrown into focus. A row erupted in Parliament on 7-3-02 over the extreme vulnerability to aerial attack of the Sellafield nuclear facility.

GreenPeace subsequently demonstrated poor security at Sizewell B by scaling, and painting, its dome. Detailed plans of Sizewell B nuclear power station were found in the car connected to the failed London bomb attacks of 21 July 2005.

A missile, or other air attack, or an attack from land or sea, could rapidly destroy not only a large chunk of national energy generation, but cover the land in radioactive fallout for an area of around 400 miles.

The current war in Ukraine, with Russia's strategy of threatening Ukraine's nuclear reactors, and destroying Ukraine's energy generation, shows how vulnerable the plans for the 'Energy Coast', and for our national energy supply, make us all.

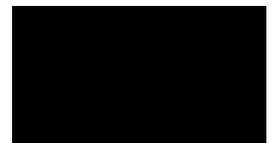
As far as peace is concerned, we should be clear sighted, for our own protection. We may not know where the next threat is coming from, but we ought to be prepared to minimise its effects with real defences and robust, coherent design.

There is no wisdom in concentrating so much essential, national infrastructure in one, small area.

Please redraw these plans, with national security and the nation's good foremost in mind. At the very least, do not place all our energy eggs in one basket.

Please allow BEIS to delay its decisions while the impact of these points can be considered.

Yours faithfully,



Dr G Horrocks, 

cc The Prime Minister
Lord Deben
Dr Therese Coffey
Rt Hon Ben Wallace MP, Secretary of State for Defence
Richard Rout, Suffolk County Council
Phil Watson, East Suffolk Council

From: [REDACTED]
To: kwasi.kwarteng.mp@parliament.uk; enquiries@beis.gov.uk; [East Anglia ONE North](#); [East Anglia Two](#)
Cc: newsdesk@beis.gov.uk; [REDACTED]
Subject: urgent re: SPR EA1N and EA2 please read immediately thank you
Date: 30 March 2022 19:22:53
Attachments: [image.png](#)

To the Rt Hon Kwasi Kwarteng
Secretary of State for BEIS

Please forgive this very brief and informal note, but we believe this is urgent and of great importance to your current deliberations and imminent announcements.

Aldeburgh Town Council wishes to inform you urgently that NGET (National Grid Energy Transmission) at a recent briefing for their new SeaLink interconnector stated that the overhead transmission lines are not sufficient to cope with an increase in generation in this area without upgrade which is not possible. They will overheat and fail with additional capacity.

They confirmed the whole reason for the SeaLink project which is being proposed is to take energy from the Friston substations site (should it be consented by yourself) to Kent and the South of England where the energy is needed.

This completely overturns the principle of offer of connection by NG to SPR, at the Friston site - which has resulted in the application for EA1N and EA2 projects at Friston which you are currently considering. We would request that you immediately include this information and if you were minded to approve that you reconsider, or pause to re-evaluate the implications.

A split decision to grant approval for generation off shore (in the North Sea as the 'Energy Sea') is appropriate, but it is obvious that the energy is not needed in the Suffolk area and is needed further south. So should come ashore for example directly at Richborough, which is possible now or in the future via a combined off shore hub, rather than one set of infrastructure bringing it ashore and across the countryside to Friston and then another 'SeaLink' with another set of substations, cable runs taking it back across the countryside and out to sea down to the South. See below map which was provided by NGET.

Please confirm you have received this message and do contact us should you need further information.

Many thanks and kindest regards
Cllr Marianne Fellowes M.B.E
on behalf of Aldeburgh Town Council

[REDACTED]

