

From: [NectonSubstationAction Messenger](#)
To: NorfolkVanguard@pins.gsi.gov.uk
Subject: Deadline 30th May 2019
Date: 28 May 2019 17:56:42

Please accept this representation from NSAG

Dear Planning Inspectorate

Norfolk Vanguard

The much vaunted reason behind this project and others like it, is to help the world by protecting the environment from the damage perceived to be caused by the burning of fossil fuels. Yet in its current form its dreadful impact on the people and animals in the local environment is belittled by the developer and the National Grid, and finally brushed aside as if it is of no meaningful consequence.

In its current form this development will cause an incredible amount of environmental damage to the lives, property, businesses, agriculture and landscapes between and including Happisburgh and Necton. This is because the National Grid have not installed an offshore ring main which would reduce the environmental damage. The National Grid patently do not consider the local environment in any way by continuing to allocate connection points in the centre of Norfolk.

In two emails to us (we can supply the originals), National Grid said: *“National Grid ... is obligated to develop and design works that provide the necessary connection for the customer at its chosen location, and also for **the economic and efficient** operation of the wider national electricity transmission system.”*

*“Any party wishing to connect at Necton in the future would need to submit a connection application. This application would be evaluated by National Grid to determine the **most economic and efficient** means of making that connection.”*

No mention of the environmental impact of the choice. We also have emails stating that it was the National Grid who offered Necton, rather than, as they make it sound, that the customer specifically asked for it. The two-ing and fro-ing on this matter, with National Grid and Vattenfall alternatively blaming the other for making the Necton choice keeps the public guessing and is yet another example of the disingenuous of this project and the companies involved.

We asked the National Grid whether when they allocated connection points they considered what was in the local area and might be affected by their proposals. They said no, that this was ‘up to the developer’, and that has proved to be so. This attitude is almost impossible to believe. The **National Grid doesn’t offer developers any environmentally friendly options** for connection points, and the developer is therefore left trying to fit massive infrastructure into blatantly unsuitable sites, thereby also placing the Planning Inspectorate in a difficult and some might say, unsolvable, situation. This is surely not the way forward?

Previously the National Grid said in answer to the question of an ORM, which was asked by us in **August 2017**:

- *“Offshore wind capacity is unlikely to reach the then 17.2GW contracted levels in timescales required to make an integrated design beneficial.*
- *10GW of offshore wind was felt to be at the top end of potential actual development and that the level of offshore wind likely to be delivered may be lower than that.”*

The email below was recently received from the National Grid by NSAG in response to their question as to whether the NG would now consider an offshore ring main

for connections, since the new Crown Estate leases have been announced, meaning that their previous reason for not going ahead (in that before there weren't plans for enough offshore windfarms to make it worth their while financially.) are now null and void. It was received as you can see on 21st May 2019

Greenhalgh (ESO), James <James.Greenhalgh@nationalgrideso.com>

Tue 21/05/2019 15:23

Dear NSAG,

“Thank you for getting in touch with us on this issue and apologies for the delay in providing a response.

As you may be aware the Electricity System Operator produces a yearly assessment of connection projects called the Network Options Assessment to assess the feasibility and the economic benefit to consumers, of existing and future projects.

As part of our NOA work we are currently looking to see if an Offshore-Ring-Main (ORM), would potentially provide a greater economic benefit for consumers in future. However, it is unlikely that existing projects in R3 will deviate from their current design, given the timescales required to implement an ORM approach and the commercial and economic implications, to both our customers and consumers, of delaying these existing projects.

In the months ahead we will be working with National Grid's Transmission business, as well as Crown Estates, BEIS and OFGEM, to identify whether there is a benefit in adopting an ORM approach for later projects in the Crown Estate's R3 process or future projects in R4.

Kind Regards”

We can of course forward you the original email should you wish it.

As you can see, an ORM is entirely feasible otherwise it would not be being considered, but there is **no mention whatsoever of any environmental savings** in their discussions, even though the use of an ORM would immensely change the environmental impact of these projects for the better. They don't consider it because of course they are a solely 'for profit' company. Likewise they blame 'timescales' for not being willing to build an ORM for Vattenfall and Orsted, when it is they themselves who have deliberately and systematically caused this delay. We know that Necton was being discussed as a connection point as long as 6 years ago. Yet, we, the ones affected by it were not informed until late in 2016, thereby immediately putting us on the back foot. We were then told we would be 'consulted', whilst at the same time were being told it was already 'too late' to change anything major.

It is a shame the National Grid are so short-sighted, because both Vattenfall and Orsted have been quoted as saying an ORM would be a sensible solution.

Because of this clear conflict of interest within the National Grid's negotiations (environment versus profit) a situation has arisen which means that developers such as the applicants are asking for government subsidies, and asking the residents of Norfolk to accept massive infrastructure and disruption, and damage to their lives and businesses, for projects which, because of the current system are patently not environmentally friendly,

because they are governed by decisions made by the National Grid, a company that puts profit above all else, and especially above environmental issues. We would remind the Inspectorate of the comments made by National Grid's employee in the email chain mistakenly sent to our spokesperson, Jenny Smedley, when he said, "*On the alternative site I'm a little wary about implying that two substations sites (Necton as is and another) is definitely worse in environmental terms than extending. The point the action group are making is that they believe it's better. I'd prefer to stick to the factual aspects...*" This strongly hints that the alternative was not environmentally worse than Necton, and should therefore have been seriously considered, which it was not, purely on the grounds of making more profit.

In answer to this point from National Grid in the above email regarding an ORM, NG say, "*...it is unlikely that existing projects in R3 will deviate from their current design, given the timescales required to implement an ORM approach and the commercial and economic implications, to both our customers and consumers, of delaying these existing projects.*"

We say that once again, it shows complete short-sightedness, or single-mindedness when it comes to the NG and environmental savings versus profit.

If the NG created an offshore ring main, and it took say 4 years until 2023, Vattenfall and Orsted (by their own admission) would only just about be ready to start their project build. If the developers missed the next subsidy auction in 2021, it might be even later than that. They then anticipate reaching operational status could take up to another 10 years.

So, should the Planning Inspectorate be minded to refuse the applications in their current format, or delay them for 4 years, the applicants would not need to lose time or money.

The build itself (if using an ORM connection) would be massively reduced in cost for the developers, as they would only be building the offshore portion.

The money they saved could then be used to pay the NG a licence fee to connect, commensurate with their savings.

The developer would lose no money on the build costs.

It is ridiculous for NG to assume that building just the offshore portion of the project would take the same 10 years the applicants have forecast for the entire project.

Therefore the applicants would stand to gain, not lose time.

The money the applicants have already spent on the planning application would be lost, as is the way with all unsuccessful planning applications. One might say that if they could not afford to lose this money they should not have taken the risk to put in the application.

Indeed with the amount of unresolved issues both the Vattenfall and Orsted projects have thrown up it is possible that the Planning Inspectorate may have a mind to refuse the applications regardless. Unless the applicants considered (quite wrongly) that their projects' applications would be merely 'box tick' exercises, they should have accepted that this money could be lost.

As for the National Grid – it would seem likely that connection fees charged to the current developers and the future ones to come would soon overtake the costs of an offshore ring main. The article below quotes that it will cost £850m to build an entire **high voltage** cable all the way from **Denmark to the UK**.

An offshore ring main travelling just along the coast of Norfolk and Suffolk should cost a fraction of this amount and additionally could be recouped by the connection charges paid by the developers.

<https://www.telegraph.co.uk/business/2018/11/08/national-grid-tap-viking-energy-worlds-longest-power-cable/>

This article states that: "*National Grid has given the green light to an £850m plan to build the world's longest high voltage power cable between the UK and Denmark.*

The energy giant's long-awaited final investment decision means the 460-mile Viking Link project will begin importing Danish electricity from 2023, rather than 2022 as originally planned."

Is it possible that this high voltage cable connection to the UK could also carry one end of the connection of the offshore ring main? Saving costs and thereby also

facilitating the transfer of any surplus energy created by the windfarms, to Denmark.

It would be a very good thing for the National Grid to use some 'joined up thinking' in this regard.

We submit that because the whole reason for the Vattenfall project (and others) is to help the environment by going 'renewable', this cannot be resolved at the cost to the environment of badly thought out projects. The saving to the environment by alternative methods must be uppermost in the minds of the Planning Inspectorate.

It would be grossly unfair if Norfolk suffered terrible detriment, merely because of bad timing and lack of proper planning on the part of the National Grid.

We ask the Planning Inspectorate to please strongly consider refusing these projects, (given the issues already highlighted by Norfolk residents) or at the very least put them on hold until such times as they can be re-reconsidered for a connection to an offshore ring main.

NSAG

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National Grid to tap Viking energy with world's longest power cable

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The 460

mile Viking Link project will begin importing Danish electricity from 2023 CREDIT:INCAMERASTOCK/ALAMY

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National Grid has given the green light to an £850m plan to build the world's longest high voltage power cable between the UK and Denmark.

The energy giant's long-awaited final investment decision means the 460-mile Viking Link project will begin importing Danish electricity from 2023, rather than 2022 as originally planned.

National Grid boss John Pettigrew said the project will help keep the company on track to grow the value of its portfolio of pipes and wires by between 5pc to 7pc over the medium term.

The power cable will be capable of powering over a million homes and is expected to earn National Grid £100m of earnings before interest, tax, debt and amortisation once it begins transmitting power beneath the North Sea.

The decision emerged as National Grid revealed that its profits for the first half of this year fell by 6pc to £1.3bn after a perfect storm of woes in its US business.

The power network operator was stung by US tax reforms and major costs of repairing storm-hit assets on the US North East coast.

National Grid's US problems also include a spate of industrial disputes over fresh worker contracts which has led to a £97m lockout of 1,200 gas workers in the US state of Massachusetts.

Around 16 union branches have accepted National Grid's health and pension benefit changes but two branches continue to resist the terms at a cost of £1m a day to National Grid.

Mr Pettigrew said he was "hopeful" that the dispute will be resolved.

National Grid will be able to pay its share of the Viking Link project, which it is developing alongside Danish transmission company Energinet, in part using the funds from the sale of its remaining stake in the Cadent gas network business.

National Grid returned £4bn to shareholders after selling a majority stake in its gas distribution networks to a Macquarie-led consortium in late 2016, in a deal valuing the business at £13.8bn.

The expected £2bn proceeds from its remaining stake will be retained by the business to reinvest in National Grid's medium-term growth.