

## **Grid connection point**

### Summary

Approval or otherwise of the grid connection point for the Proposed Development would appear to be a matter for this examination.

A consideration of the alternatives, giving adequate weight to onshore planning, environmental and amenity aspects and the impact on local communities consistent with the Planning Act 2008 and the National Policy Statements, seems to be required and does not appear to be inherent in the process by which a grid connection offer has been made.

Onward grid capacity is critical to climate change objectives. This too does not seem to have been given appropriate weight in the grid connection offers for Vanguard, Boreas, Hornsea Three and the Proposed Development.

Approval of the application as submitted would be the final step in the grid connection agreement procedure. In the absence of development consent, it would appear that the connection offer lapses.

Extracts from relevant documents are provided overleaf. Due to the late submission from NG ESO for Deadline 1, this representation has been prepared in haste and may not be complete.

### Grid connection agreement

In its response to issues raised at the first Open Floor Hearing (OFH1), the applicant makes clear that the proposed grid connection point has been identified by National Grid in a connection offer.

Past examples suggest that, after informal discussion, a grid connection offer is made by NG ESO on the basis of an offer which, in turn, NG ESO has received from NG ET. This has been confirmed by NG ESO for the purposes of this examination (EN010109-001049, paragraph 1.5).

It would appear that the dialogue between NG ESO and NG ET does not necessarily include the applicant at all stages, and is not based upon the Planning Act 2008, the National Policy Statements, or other relevant legislation applicable to this examination. Cumulative impacts do not appear to have been considered at all.

Local Impact Reports, which were not available during the CION process, are likely to be a key consideration in terms of landscape character, construction traffic, economic and social impacts, etc.

It follows that the present examination is the only route by which such issues can be addressed.

### Past Examples

A similar discussion took place during the examinations for East Anglia One North and Two. The wording of the responses to the examining authority's questions provides somewhat greater clarity.

Further, in its Phase 1 Report for the Offshore Transmission Network Review, NG ESO made clear that it has not specifically taken account of cumulative impacts, and that the impact on communities has been 'managed' – presumably by the applicant through the DCO examination procedure. This applies to the timeframe when the grid connection offer was made for the Proposed Development.

It would appear that the suitability of the grid connection is an open issue.

**1 Dudgeon and Sheringham Shoal Extensions (EN010109-001017, page 6)**

The Connection and Infrastructure Options Note (CION) Process is the mechanism used by National Grid to evaluate potential transmission options to identify the connection point in line with their obligation to develop and maintain an efficient, coordinated and economical system of the electricity transmission network. The grid connection point for SEP and DEP was determined by National Grid following the completion of the CION process. The CION process stipulates that it is the decision of National Grid rather than the applicant to decide where the grid connection point will be.

**2 East Anglia One North and Two (EN010077-003325, page 15)**

All connection offers made by NGENSO are subject to consents being granted and therefore do not pre-judge the acceptability of the connection locations. Promoters must carry out their own site selection process and secondly they must obtain all necessary consents from a planning and environmental perspective, which provides the necessary safeguards to ensure this is considered in full in relation to any future proposal. There is no certainty of consent within the NGENSO processes.

Government and the Regulator expect the planning process to determine if a proposal is acceptable or not in planning and environmental terms. In this instance the Promoter has elected to lead the activity associated with that process.

**3 East Anglia One North and Two (EN010077-003213, page 1)**

The connection offer process is managed and led by NGENSO and NGENSO issue connection offers. A National Grid note explaining how that process works and how the Leiston area was identified for the purposes of making a connection offer is on the ScottishPower Renewables project website at:



All connection offers issued are always subject to consents. In other words, the connection agreement can only be implemented if the necessary consents and land rights are secured.

**4 Offshore Coordination Report (30th September 2020, Annex 1, page 13)**

**Table 2-1 Comparison of project specific and integrated offshore network design approaches**

<b>Project Specific Design Approach</b>	<b>Integrated Offshore Network Design Approach</b>
<ul style="list-style-type: none"> <li>Requirements for each project considered separately</li> </ul>	<ul style="list-style-type: none"> <li>Takes account of possible future requirements</li> </ul>
<ul style="list-style-type: none"> <li>Only considers point-to-point offshore network connections</li> </ul>	<ul style="list-style-type: none"> <li>Considers a range of connection options including multi-terminal/meshed HVDC and HVAC options</li> </ul>
<ul style="list-style-type: none"> <li>Individual project optimisation and transmission (HVAC or HVDC) decision</li> </ul>	<ul style="list-style-type: none"> <li>Considers whole system optimisation and transmission technology decisions</li> </ul>
<ul style="list-style-type: none"> <li>Onshore and offshore network designs are considered separately</li> </ul>	<ul style="list-style-type: none"> <li>Considers effect on onshore system as part of offshore design development</li> </ul>
<ul style="list-style-type: none"> <li>Interconnectors are designed and connected separately</li> </ul>	<ul style="list-style-type: none"> <li>Possibility that interconnector/bootstrap capacity can be shared by an offshore wind farm</li> </ul>
<ul style="list-style-type: none"> <li>Local community impacts are managed on a project by project basis</li> </ul>	<ul style="list-style-type: none"> <li>Local community impacts considered on an overall impact basis</li> </ul>