
From: Michael Mahony <[REDACTED]>
Sent: 07 November 2022 12:28
To: Nautilus <Nautilus@planninginspectorate.gov.uk>; South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Cc: Therese Coffey <[REDACTED]>; Richard Rout <[REDACTED]>; Graham Gunby <[REDACTED]>; Craig Rivett <[REDACTED]>; Philip Ridley <[REDACTED]>; Naomi Goold <[REDACTED]>; Andrew Reid <[REDACTED]>; Russ Rainger <[REDACTED]>; Tom Daly <[REDACTED]>
Subject: Eurolink, Sealink and Nautilus - Community Overload

Dear Project Teams

I am writing concerning a number of management matters relating to these projects.

Before doing so I would point out that the DCOs for Scottish Power's EA1N and EA2 projects, upon which a critical part of the above projects rely, are currently subject to judicial review and therefore the comments below are without prejudice to the outcome of the judicial review.

As you may be aware the same communities within the East Suffolk heritage coastal area between Aldeburgh, Leiston and Saxmundham are being subjected to proposals for a further three major energy projects, Nautilus, Eurolink and Sealink. It has already suffered Sizewell C, EA1N and EA2 which also included a fourth NSIP for National Grid.

Nautilus has already held an informal consultation. Eurolink and Sealink started informal consultations on 24 October 2022 which end on 18th December 2022. Although the consultation period is the same there are different times and places for events meaning that people have to go to at least 2 events rather than one. This is oppressive and confusing, and is damaging to the well-being of the community.

I note that the most recent PINS project meetings relating to these projects took place on the same date, the last published project meeting notes being on 20th June 2022. In fact this meeting would appear to be a joint meeting covering all three projects.

It obviously makes sense for project meetings to take place at the same time and be joint because the consultation materials for these projects indicate a desire for coordination onshore with landfall at the same location and the same converter station site being considered for all

three projects. Accordingly coordination should extend to the planning processes so that informal and statutory consultations take place at the same time, scoping opinions are issued and consulted on at the same time and generally all pre-examination and examination processes take place at the same time. The reasons are simple. If these projects are coordinated the onshore impacts will be identical for all three projects and therefore it would be much more efficient for everybody for there to be one planning/examination process for all three projects. There is a clear precedent for this with the EA1N and EA2 projects.

I would welcome your comments.

In addition there are a few housekeeping matters.

Can you please advise whether have been any further project meetings since 20th June 2022 and if so when the meeting notes will be published. Further it would greatly assist if a notification is sent to people who have registered for updates when meeting notes etc are published. Those notes should be published as soon as possible as they often contain important information.

At the moment the Sealink project does not appear on the drop-down menu for Eastern region projects. Further Eurolink does not have a project page at all despite National Grid starting consultation.

The project location map for Sealink is completely misleading. Compare it with that for Nautilus. In fact the map is so misleading arguably it would be better not to have one at all.

Again I would welcome your comments

Michael Mahony
SASES

Substation Action Save East Suffolk Limited a company incorporated in England and Wales,
registered number 13790115, registered office Moor Farm Nr. Friston, Saxmundham IP17 1N

From: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Sent: 15 November 2022 11:45
To: 'Michael Mahony' <[REDACTED]>; Nautilus <Nautilus@planninginspectorate.gov.uk>; South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Cc: Therese Coffey <[REDACTED]>; Richard Rout <[REDACTED]>; Graham Gunby <[REDACTED]>; Craig Rivett <[REDACTED]>; Philip Ridley <[REDACTED]>; Naomi Goold <[REDACTED]>; Andrew Reid <[REDACTED]>; Russ Rainger <[REDACTED]>; Tom Daly <[REDACTED]>
Subject: RE: Eurolink, Sealink and Nautilus - Community Overload

Dear Mr Mahony

Thank you for your email, apologies for the delay in responding. My name is Michele Gregory and I am the Case Manager assigned to the Sea Link project, Sian Evans is the Case Manager assigned to the Nautilus project, the relevant contact details are below. At this point no Case Manager has been assigned to the EuroLink project, therefore please contact the NIEnquiries@planninginspectorate.gov.uk mailbox with any queries specifically relating to that project.

We note your concerns regarding the numerous Nationally Significant Infrastructure Projects (NSIPs) in the East Suffolk area and the various consultations that are currently taking place for the Sea Link project (Developer - National Grid Electrical Transmission (NGET)) and the EuroLink and Nautilus projects (Developer - National Grid Ventures (NGV)). As you are aware Pre-application consultation is run by the Developer and we would advise you to raise your concerns about the impact on the community of multiple consultations, both non-statutory and statutory, with the Developers. You can also raise your concerns with the relevant Local Authorities. Information about the consultation process to be followed by Developers is set out in the Planning Inspectorate's 'Advice Note 8.1: Responding to the developer's pre-application consultation' which is available here: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-8-1/>.

I can confirm that the Planning Inspectorate has held joint project meetings in relation to the Sea Link and Nautilus and EuroLink projects, the last joint meeting was held on [20 June 2022](#). Following the meeting on 20 June 2022 a further project meeting between the Planning Inspectorate and NGET in relation to the Sea Link project took place on 20 October 2022. The meeting note will be published on the project webpage of the National Infrastructure Planning website in due course. An initial project meeting took place between the Planning

Inspectorate and NGV in relation to the EuroLink project on 15 September 2022, and a project webpage will be set up in due course where the meeting note will be published. Please note that it is not a requirement to have a project webpage set up on the National Infrastructure Planning website before a Developer begins consultation. Various matters, including onshore coordination and the approach to consultation by the two Developers of the Sea Link and Nautilus and EuroLink projects were discussed at the earlier meetings, however the 20 October 2022 meeting was solely in relation to the Sea Link project and the 15 September 2022 meeting, whilst touching on the Sea Link project, was mostly in relation to the EuroLink project. At this time there have been no separate meetings between the Planning Inspectorate and NGV in relation to the Nautilus project.

With regard to the EuroLink project, the Planning Inspectorate is aware that the Developer (NGV) requested a Section 35 Direction (under the Planning Act 2008 (PA2008) from the Secretary of State (SoS) for Business, Energy and Industrial Strategy (BEIS) to direct that the proposed development be treated as development of national significance for which development consent is required. The SoS made the Section 35 Direction on 23 August 2022 and it is available here: <https://www.gov.uk/government/publications/eurolink-multi-purpose-interconnector-section-35-direction-planning-act-2008>.

With reference to the housekeeping matters you have raised, I can confirm that email notifications are not sent during the Pre-application stage of the NSIP process, this is confirmed when signing up for the email notifications:

*'The notification service provides email updates for the Sea Link following the submission of the application to the Planning Inspectorate. **The Planning Inspectorate will not provide updates about this project at the Pre-application stage of the process.***

Finally, the Sea Link project does not appear on the drop-down menu of the National Infrastructure Planning website for projects in the Eastern region as this project links Sizewell in Suffolk to Richborough in Kent and it therefore appears in the drop-down menu for projects in the South Eastern region. Unfortunately the website has a limit of one grid reference to pin point the location of a project. As you may be aware all projects are listed in the [Register of applications](#).

I hope this information is helpful.

Yours sincerely

Michele Gregory
Email: SouthEastAngliaLink@planninginspectorate.gov.uk
Tel: 0303 444 5000

Sian Evans
Email: Nautilus@planninginspectorate.gov.uk
Tel: 0303 444 5000

From: Michael Mahony [REDACTED]
Sent: 06 March 2023 12:18
To: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>; Nautilus <Nautilus@planninginspectorate.gov.uk>
Cc: Contact Sealink <contact@sealink.nationalgrid.com>; info@nautilus.nationalgrid.com; .box.ContactEurolink <info@eurolink.nationalgrid.com>; Naomi Goold [REDACTED]; Graham Gunby <[REDACTED]> Friston Parish Clerk [REDACTED]
Subject: Sealink, Nautilus and Eurolink Interconnectors

Dear Sealink, Nautilus and Eurolink* case management teams

You have recently published on the project page for Sealink the meeting note below which is relevant to all three National Grid interconnector projects in East Suffolk, albeit with the primary focus on Sealink**.

The meeting note sets out advice given to the applicant National Grid in relation to its three interconnector projects albeit with different divisions of National Grid promoting them.

However it would appear from this note that you are unaware of the following material information which directly impacts on this advice.

1. Status of EA1N, EA2 and National Grid Connection Hub Projects

As I assume you are aware the "Friston Substation", more accurately described as the "National Grid connection hub", is one of three NSIP projects proposed at Friston where consent for all three has been granted under two DCOs (for EA1N and EA2) granted to Scottish Power. Please note however that National Grid will build its connection hub not Scottish Power. These DCOs are currently subject to two separate sets of ongoing judicial review proceedings and therefore those projects may not go ahead. If they do not then self-evidently there will be no Friston substation/National Grid connection hub for the interconnector projects to connect to. However this meeting and other meetings on the interconnector projects clearly take place on the assumption that the EA1N and EA2 DCOs will not be set aside and the National Grid connection hub will be built. This assumption is not accepted by SASES but given you are proceeding on this basis the following comments need to be made.

2. Coordination required for six projects not three

The discussion around coordination only relates to the three National Grid interconnector projects whereas in reality it will be required for six projects, given one project (the National Grid connection hub) will be the connection point for the other five. The reason for this is simple. Whilst the proposed landfall and part of the onshore cable route will be different for the interconnector projects as the cable route approaches the National Grid connection hub it will converge with that of the Scottish Power's EA1N and EA2 which are being constructed in a similar timeframe. Therefore any discussion of "coordination" is incomplete unless it relates to all six projects. Further the National Grid connection hub will need to be "extended" for the interconnector projects (for which planning consent will be required) and therefore such extension will need to be coordinated with its original development.

In this context it should be remembered National Grid has always intended that its connection hub would

serve a number of other projects and coordination has been at the heart of the connection hub development from the outset.

Furthermore this is not a question of six separate projects with six separate developers seeking to coordinate. Here we have four closely related projects being proposed by the same developer, namely National Grid, where one of those projects is a key part of two other developments been promoted by only one other developer, namely Scottish Power.

3. Unsuitability of Friston substation/National Grid connection hub site for future development

Whilst coordination has always been implicit in National Grid's plans the connection hub location is not suitable as a connection point at all, let alone for multiple projects which will require the National Grid connection hub to be extended. This is a matter which was debated at length during the examinations for EA1N, EA2 and the National Grid connection hub, and is at issue in one set of judicial review proceedings. The Examining Authorities did not properly assess or address this issue but even they were compelled to comment that:

"The ExA observes that effects of the cumulative delivery of the Proposed Development with other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location."(Paragraph 28.4.5 of the ExA Reports)

To date there does not appear to be any reference to the problematic nature of the connection hub site in your meetings with National Grid.

4. Coordination of the Planning Process

Although there is discussion of coordinating these three projects there is no reference to coordinating the planning process for these projects. The East Suffolk community has already had to bear the burden of the long and intensive DCO applications for EA1, EA3, Sizewell C, EA1N and EA2, and is now being subjected to three more proposed DCO applications. I previously wrote to you on this subject on 7 November 2022 to which you replied on 15 November 2022. However your reply only dealt with the question of coordination of consultation not the remainder of the planning process. In my email of 7 November 2022 I wrote "generally all pre-examination and examination processes [should] take place at the same time. The reasons are simple. If these projects are coordinated the onshore impacts will be identical for all three projects and therefore it would be much more efficient for everybody for there to be one planning/examination process for three projects. There is a clear precedent for this with the EA1N and EA2 projects."

This issue does not yet appear to have been addressed by the Planning Inspectorate.

Conclusion

Can you please confirm that you will address these four issues in future meetings with National Grid and that discussions on these issues will be fully reflected in the notes of the meetings.***

Friston Parish Council also takes a close interest in these matters and this email is copied to the parish clerk. Can you please copy your reply to the parish clerk of Friston Parish Council.

https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020026/EN020026-Advice-00007-1-EN020026_SEA_Link_final_project_update_meeting_notes_31_January_2023.pdf

* In your email of 15 November 2022 you stated that "An initial project meeting took place between the Planning Inspectorate and NGV in relation to the Eurolink project on 15 September 2022, and a project webpage will be set up in due course where the meeting notes will be published". Furthermore you referred to the Section 35 direction from the Secretary of State. However there still does not appear to be a project webpage for Eurolink despite the fact that a meeting took place almost 6 months ago and the matters discussed at that meeting are matters which it is in the public interest to disclose.

**For the ease of those members of the public who follow these matters it would be helpful if notes which relate to all three projects were to appear on the project pages for each project.

*** I note that a general project update meeting was proposed for 27 February 2023. Did that meeting take place and if so when will the meeting note be published?

Best

Michael

Michael Mahony
SASES

Substation Action Save East Suffolk Limited a company incorporated in England and Wales, registered number 13790115, registered office Moor Farm Nr. Friston, Saxmundham IP17 1NH

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On 16 Mar 2023, at 15:23, South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk> wrote:

Dear Mr Mahony

Thank you for your email. You have asked that the four issues you raise be addressed in future meetings between the Planning Inspectorate and National Grid. Please see the responses below to the four issues:

1. We note that the East Anglia One North (EA1N) and East Anglia Two (EA2) Development Consent Orders (DCO) are currently the subject of judicial review however, at this time, the DCOs for EA1N and EA2 remain as made on 31 March 2022. The Planning Inspectorate provides pre-application advice based on the extant position.
2. We note your reference to the various projects and their proposed connection to the proposed new National Grid substation at Friston. The Planning Inspectorate is providing case specific pre-application advice to both National Grid Electricity Transmission (NGET) and National Grid Ventures (NGV) as two separate Developers in relation to proposed applications for Orders granting Development Consent. Both Developers, as you have noted, have confirmed that they are seeking to co-ordinate how they go about constructing new infrastructure with all developers in the area, for example by sharing construction areas. We will continue to advise both Developers that where they are seeking to co-ordinate construction this should be clearly set out in any consultation materials so that all stakeholders are able to understand the proposals and provide comments. We would advise you to raise the matter of co-ordination of construction and extension of the National Grid substation directly with the Developers.

You may be aware that the Planning Inspectorate's [Advice Note Seventeen](#) provides advice and information about the requirement for a cumulative effects assessment (CEA), as set out in the

Environmental Impact Assessment (EIA) Directive, to be carried out by an Applicant. It states at paragraphs 1.5 and 1.6:

“1.5 The need to consider cumulative effects in planning and decision making is set out in planning policy (for example: The relevant National Policy Statements (England and Wales); National Planning Policy Framework (NPPF) (England); Planning Policy Wales (Wales)), in particular the [National Policy Statements \(NPSs\)](#). For example, the [Overarching NPS for Energy \(EN-1\)](#) paragraph 4.2.5 states that “When considering cumulative effects, the ES should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence)”. For the purposes of this Advice Note, ‘other existing development and/or approved development’ is taken to include existing developments and existing plans and projects that are ‘reasonably foreseeable’.

NPS EN-1 paragraph 4.2.6 goes on to state that the Secretary of State should consider how the “accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.

1.6 The [NPSs](#) variously state that applicants should, amongst other matters, consider mitigation for cumulative effects in consultation with other developers; assess cumulative effects on health; give due consideration to other NSIPs within their region; consider positive and negative effects; and consider environmental limits”

3. The merits of a particular proposed Development, such as the suitability of the proposed site for the National Grid substation at Friston, are not matters that the Planning Inspectorate is able to provide pre-application advice on. Again, we advise that you raise this matter with the Developers.
4. The timing for the submission of a DCO application lies with the Developer. As you are aware when an application is submitted the Planning Inspectorate has 28 days to consider if it can be accepted. If it is accepted an Examining Authority will be appointed in due course. Section 61 of the Planning Act 2008 sets out the criteria to be applied when appointing the Examining Authority, which includes the complexity of the case and the level of public interest. It is then for the appointed Examining Authority to determine how the application should be examined. We note your reference to the Examination process for the EA1N and EA2 projects however it should be noted that these applications were submitted at the same time and by two Developers with a common parent company.

With regard to the project webpage on the National Infrastructure Planning website for the Eurolink project I can confirm that the Planning Inspectorate is awaiting project specific information from the Developer, NGV. This has been requested and when received the project webpage will be published along with a copy of the 15 September 2022 meeting note.

Please note that joint meeting notes are currently published on each project webpage where advice is provided to multiple Developers in relation to multiple projects. Where advice is provided on a specific project only, that is published on the relevant project webpage in accordance with Section 51 of the Planning Act 2008.

A note of the Sea Link project update meeting that took place on 27 February 2023 will be published on the project webpage for the Sea Link project shortly.

Please note that this reply has been copied to the clerk of Friston Parish Council as requested.

I hope this information is helpful.

Kind regards

Michele Gregory

Michele Gregory | Case Manager - National Infrastructure

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From: Michael Mahony <[REDACTED]>
Sent: 23 March 2023 10:04
To: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Cc: Nautilus <Nautilus@planninginspectorate.gov.uk>; Contact Sealink <contact@sealink.nationalgrid.com>; info@nautilus.nationalgrid.com; .box.ContactEurolink <info@eurolink.nationalgrid.com>; Naomi Goold <[REDACTED]>; Graham Gunby <[REDACTED]>; Friston Parish Clerk <[REDACTED]>
Subject: Re: Sealink, Nautilus and Eurolink Interconnectors

Dear Ms Gregory

Thank you for your email. A few points.

1. In a number of places you suggest that matters should be raised with the developers. You will have noted that my email was copied to the developers. So far they have felt no need to comment on the issues raised in my email. Given the content of your email I would now expect them do so.
2. I note you are treating NGET and NGV as two separate developers. However as you note with regard to EA1N and EA2 although these applications were submitted by two separate developers they had a common parent company. The position is the same with NGET and NGV which are part of the National Grid group with the same parent company National Grid plc.
3. As to the efficiency of the planning process is it the case that the Planning Inspectorate has no view as to whether it would be more efficient (including in terms of cost) and less burdensome overall for the planning process for Sealink, Eurolink and Nautilus to proceed on the same timetable with the same examining authority rather than on three different timetables with three different examining authorities with three separate sets of representations, written submissions open floor hearings, issue specific hearings etc etc?

Michael Mahony
SASES
[REDACTED]

Substation Action Save East Suffolk Limited a company incorporated in England and Wales, registered number 13790115, registered office Moor Farm Nr. Friston, Saxmundham IP17 1NH

From: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Sent: 31 March 2023 16:35
To: Michael Mahony <[REDACTED]> South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Cc: Nautilus <Nautilus@planninginspectorate.gov.uk>; Contact Sealink <contact@sealink.nationalgrid.com>; info@nautilus.nationalgrid.com; .box.ContactEurolink <info@eurolink.nationalgrid.com>; Naomi Goold <[REDACTED]>; Graham Gunby <[REDACTED]> Friston Parish Clerk

Subject: RE: Sealink, Nautilus and Eurolink Interconnectors

Dear Mr Mahony

Thank you for your email.

With regard to the matter of the Planning Inspectorate's view on the most efficient method of dealing with the Sealink, Eurolink and Nautilus proposed applications for Development Consent Orders (DCOs) I can confirm that there are a number of factors that we would need to consider which mean, at this time, it is difficult to provide a view. As previously stated, the Planning Inspectorate has no control over the submission dates of Nationally Significant Infrastructure Project (NSIP) applications, and it is not able to compel Developers to merge applications. As you may be aware the projects are for two different types of development, Sealink is a 'Reinforcement' development whereas EuroLink and Nautilus are separate 'Interconnector' developments, and as you note there would be three separate applications for three separate DCOs. The Planning Inspectorate would need to consider resource implications and the workloads associated with each individual application within the statutory deadlines, for both internal and external stakeholders. There are likely to be many other factors that would also need to be considered.

The Planning Inspectorate will however continue to explore the possibilities for co-ordination with the Developers and we note the concerns you have raised.

Finally, we acknowledge that both NGET and NGV are part of National Grid Group however the position is not the same as that of the East Anglia projects (EA1N and EA2) where it was the parent company, Scottish Power Renewables (SPR), who approached the Planning Inspectorate for pre-application advice as the Developer of both projects. Pre-application advice was subsequently provided to SPR prior to the submission of the two applications. We would advise you to contact National Grid Group about the interrelationship of NGET and NGV.

By way of an update I can confirm that the meeting note for the Sea Link project update meeting that took place on 27 February 2023 has now been published on the [project webpage of the National Infrastructure Planning website](#). I can also confirm that a [project webpage has now been created for the EuroLink project](#) and the project update meeting note for 15 September 2022 will be uploaded to the webpage shortly.

Please note that your emails of 7 November 2022, 6 March 2023 and 23 March 2023, along with our responses of 15 November 2022, 16 March 2023 and today, will be published on the relevant project webpages of the National Infrastructure Planning website in accordance with section 51 of the Planning Act 2008.

I hope this information is helpful.

Kind regards

Michele



The Planning
Inspectorate

Michele Gregory | Case Manager - National Infrastructure

The Planning Inspectorate

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