
From: Michael Mahony [REDACTED]
Sent: 14 April 2023 13:05
To: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>

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Subject: Re: Sealink, Nautilus and Eurolink Interconnectors

Dear Ms Gregory

Thank you for your email of 31 March 2023. You should be aware that despite our expectation that National Grid would comment on our correspondence (as set out in paragraph 1 of my email of 23 March 2023) it has not done so.

Dealing with each of the points in turn.

Most efficient means method of dealing with the Sealink, Eurolink and Nautilus DCO applications I note your comments. You state that the projects are for two different types of development stating that Sealink is a "reinforcement". This is mere semantics by National Grid. The substance of these three projects onshore in a small area of East Suffolk is identical involving (i) landfall, (ii) DC cable route to a convertor station, (iii) a convertor station (iv) an AC cable route to the proposed National Grid connection hub at Friston and (v) expansion of the National Grid connection hub.

In respect of the consideration of the most efficient method of dealing with the three DCO applications and impacts on external stakeholders, I assume external stakeholders includes the members of the community most affected by these proposals and relevant parish councils. Please confirm. Incidentally I have noted the following in the About Us section relating to the Planning Inspectorate on the gov.uk website.

We provide the application process for nationally significant infrastructure projects (NSIPs) across England and Wales. NSIPs, such as new harbours, roads and power generating stations, require development consent before they can be constructed. We:

- *provide a streamlined application service to assess applications for NSIPs*
- *balance the country's needs and developers' plans with the likely impacts on localities, listening carefully to the views of communities, specialist groups and others' interests (emphasis added)*
- *deliver a predictable and efficient process, providing certainty for all involved, including ministers who make the final*

decision on whether a project is approved (emphasis added)

Coordination – to be clear coordination covers at least two areas. First the coordination of the projects themselves and second the coordination of the DCO processes whereby consent is being sought for those projects.

National Grid - I note your suggestion that I contact National Grid about the interrelationship of its NGET and NGV divisions. I am aware from past discussions as to the purported separation of these two divisions, but the reality is their management reports into a single controlling entity, and these two divisions will have for practical purposes a very close relationship. This was evidenced by the joint statement issued by North Falls, Five Estuaries and National Grid last year in respect of coordination. You will note that despite the text of the statement referring to both the NGET Sealink project and the NGV interconnector projects, that National Grid was the sole signatory. The statement can be found here <https://www.gov.uk/government/publications/offshore-transmission-network-review/pathfinder-projects/joint-statement-from-north-falls-five-estuaries-and-national-grid/commitment-to-exploring-coordinated-network-designs-in-east-anglia>.

Therefore I cannot see any barrier to National Grid coming forward and requesting that these three projects are considered together in a combined examination process as was the case for the EA1N and EA2 projects.

National Infrastructure planning website – Thank you for the updates to the site. In terms of the Eurolink page this appears under the “South Eastern” tab when it should be under the “Eastern” tab as is the case for Nautilus. Furthermore presumably the same location map can be used for Eurolink as is used for Nautilus. Also thank you for uploading our correspondence however this has not been reproduced in chronological order so it could be confusing to the reader. Could this be corrected please.

In terms of the meeting note published for the meeting on 27 February 2023 I thought you need to be aware of the following points.

Project Update

It is stated that "the Applicant explained that monthly meetings continue to be held with local authorities and statutory and non-statutory bodies, focusing on responses received from the Scoping Opinion". Please note that Friston Parish Council submitted the attached document in response to the scoping opinion but it has not had or been offered a meeting concerning this response.

Indicative Timeline

In terms of the indicative timeline it may be helpful to compare the timelines which have been prepared by National Grid for all three projects. Rather confusingly these have been produced in different formats and with different sets of key milestones. This is not helpful. For ease of reference the relevant pages in the National Grid documents are as follows.

- Sea Link Project Background Document dated October 2022 page 41
- EuroLink Interconnector Consultation Briefing Document dated November 2022 page 14
- Nautilus Interconnector Update on our Proposals and Consultation Programme dated September 2021 page 15. This document may be a little outdated now.

However a number of key milestones do have the same descriptions and it would appear that statutory consultations in respect of Sealink and Eurolink will take place this year with submission of their DCO applications in 2024.

The construction period in relation to Sealink is stated to take place between 2026 and 2030. The Eurolink document does not set out the construction period but it does state that the final investment decision will be in 2026 and Eurolink will be operational in 2029, so one can only assume that construction will take place between 2026 and 2029.

Could I suggest that in future meetings that the timelines for all three projects are discussed and that the timelines are in the same format with the same milestone dates given the desirability of coordination and efficiency. I did note that PINS has *“emphasised the need to ensure that lines of communication are kept open and decisions from all projects shared”* and also *“that it would be helpful for the information known on the timelines of the other projects to be included in the consultation documents”*. This should include EA1N, EA2 and the proposed National Grid connection hub at Friston.

Approach to Coordination

As mentioned above and in previous correspondence (see paragraph 2 of email of 23 March 2023) there is a need to coordinate with the EA1N, EA2 and National Grid connection hub projects. Please note that the latest update issued by Scottish Power in relation to EA1N and EA2 states:

The outline programme set at the start of these projects is always subject to external factors and, as a responsible developer, our current focus is to ensure that all requirements in the DCO are discharged. At present, **we expect onshore construction to commence in 2024/2025 and energisation to commence in 2027**[emphasis added]. Further surveys will take place throughout 2023 and we will share details as and when the information is available.

Accordingly the construction periods for all six projects will overlap and as you are aware one of these projects, the National Grid connection hub, facilitates the five other projects.

Next Steps

It is stated that SCC noted that a single examination may bring benefits in terms of administration. In fact a single examination for all three interconnector projects would bring benefits far beyond administration. A single examination will enable the same issues that will arise in respect of each project to be considered by the same examining authority at the same time and will involve only one set of submissions be made and one set of hearings, rather than three sets to potentially different examining authorities at different times. One examination would involve great savings of time and cost to all parties involved. This is of particular relevance to the local community who have limited resources. They participate in their own time without remuneration and fund professional advice from their own private resources. In stark contrast all other parties are paid to participate in the examination process and furthermore the local authorities' costs are paid for by the developers. This is a clear example of the unfairness of the DCO process to local communities.

I appreciate that the selection of members of the examining authority is some way off but it would undoubtedly be of assistance if one or more members of the examining authorities for EA1N and EA2 projects could be appointed to the examining authority for these projects.

Matters Arising

DCO documents – the DCOs for EA1N, EA2 and the National Grid connection hub at Friston were subject to detailed review and debate during the examination. National Grid should be familiar with those DCOs as it would have been directly involved in their drafting given they include the consent for the National Grid connection hub. If these interconnector projects reach the application stage it would save time if positions reached in relation to these DCOs are reflected in the draft DCOs for the interconnector projects in respect of their onshore infrastructure.

Questions/AOB

It is stated that the next meeting will be held in mid-April. It would be helpful if the relevant meeting note could be published as soon as possible.

Thank you again for responding to our concerns with these projects.

Michael Mahony
SASES



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Subject: RE: Sealink, Nautilus and Eurolink Interconnectors

Good morning Mr Mahony

Thank you for your email. Firstly I can confirm that the reference to 'external stakeholders' in my email of 31 March 2023 did indeed include members of the community / local residents as well as Parish Councils. Secondly, we note your reference to the joint statement signed by National Grid and your assertion that National Grid could request that the three projects are considered together. Whilst the Planning Inspectorate is not able to compel Developers to merge applications we will continue to discuss this aspect of co-ordination with them. Your comments in relation to 'Next Steps' and 'Matters Arising' are noted and we would again advise that you raise these directly with the Developers. You may be interested in the Planning Inspectorate's [Advice note thirteen: Preparation of a draft order](#)

[granting development consent and explanatory memorandum](#) and [Advice Note Fifteen: Drafting Development Consent Orders](#) which provides specific advice to applicants and others on the Development Consent Order (DCO) and its provisions.

Finally, thank you for highlighting the issue with the location of the Eurolink project on the National Infrastructure Planning website, this has now been updated. Also, the email trail of our previous correspondence has now been re-ordered and republished. Your email and this response will be combined separately to the previous email trail and published on the relevant project webpages of the National

Infrastructure Planning website in accordance with section 51 of the Planning Act 2008. With regard to the next project update meeting (now likely to be in June 2023) and the corresponding note, we always endeavour to publish these as soon as practicable.

Kind regards

Michele

Michele Gregory | Case Manager - National Infrastructure
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