Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

SEAS response to Rep8-074 the Applicants Extension of National Grid Substation Appraisal Deadline 9 - 15 April 2021

by

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SEAS response to REP8-074 the Applicants Extension of National Grid Substation Appraisal Deadline 9 - 6 April 2021

A. INTRODUCTION

1. SEAS response to the Applicants Extension of National Grid Substation Appraisal (REP8-074).

2. In this representation SEAS raises a number of specific points following submissions made by the Applicant at Deadline 8 with regard to Cumulative Impact Assessment (CIA). We have not sought to repeat the content of our submissions made at deadline 8 (REP8-242) and deadline 5 (REP5-115), in addition to our original Written Representation submitted at Deadline 1 (REP1-328) on this topic. We maintain the position set out in each of these submissions.

B NAUTILUS AND EUROLINK CUMULATIVE IMPACT ASSESSMENT IS WHOLLY INADEQUATE

3. The cumulative impact assessment submitted by the Applicant at Deadline 8 (REP8-074) is wholly inadequate.

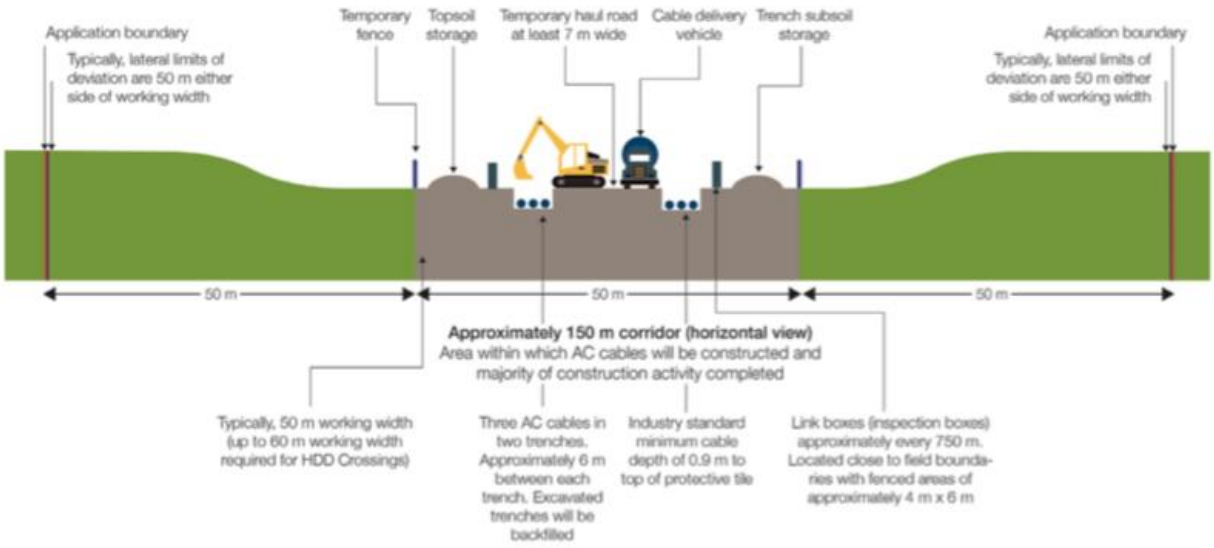
(i) **There is no assessment of the cumulative impact of the cable route, landfall site or converter substation site.**

4. SPR has predictably justified this lack of assessment by claiming that insufficient information is available.

5. Yet in the Nautilus Interconnector FAQs[1] document, the following diagram is published by National Grid Ventures showing typical cable construction for HVAC and HVDC cables.

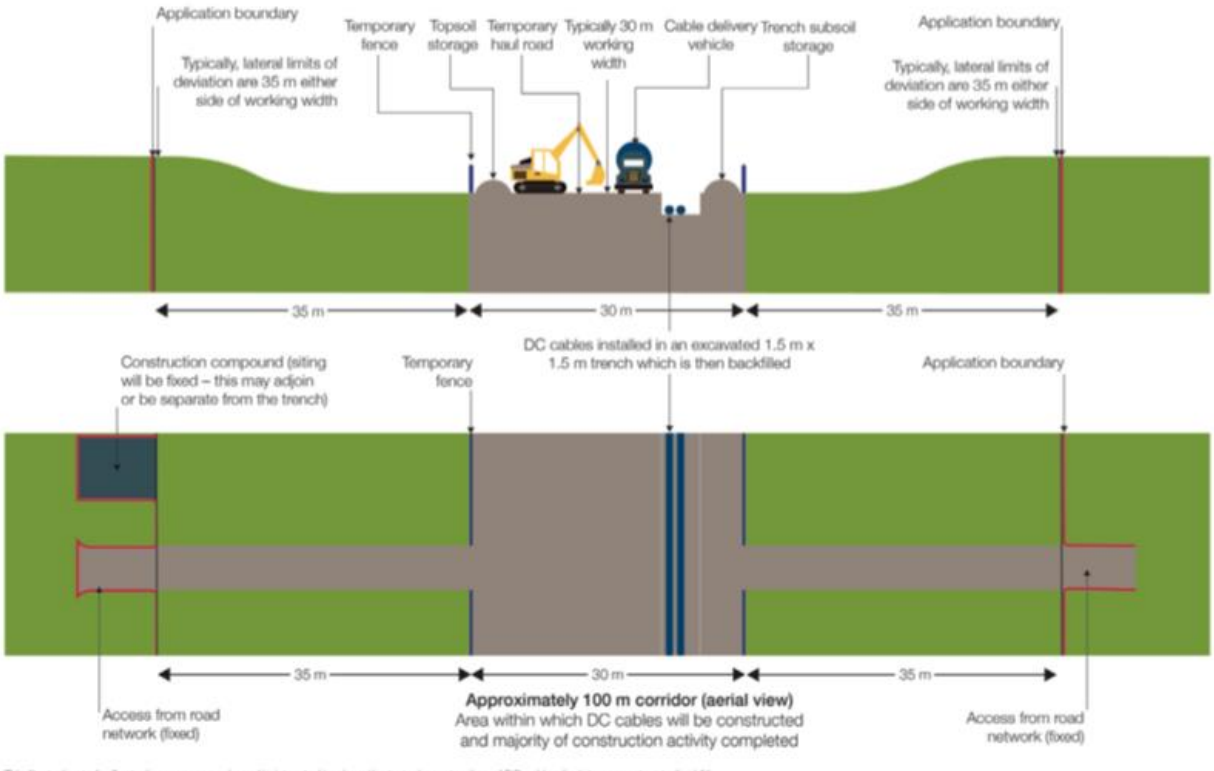
[1] Nautilus Interconnector FAQ, National Grid Ventures, May 2020
https://www.nationalgrid.com/document/132456/download

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



6. This document states quite clearly the "*Nautilus Interconnector is not able to share the same cables or cable trenches*".

7. If one looks at the diagram above and assume that these two projects are constructed, as has been suggested by NGV, as a Multi Purpose Interconnector and share the same cabling,

then this document shows that for HVDC technology this would typically require a 30m cable corridor with an additional 35m boundary each side to take the full construction activity to approximately 100m.

8. If the converter and substation are to be 5 km apart, HVAC size cable corridors will carve once more through Suffolk to the substation at Friston. According to NGV's FAQ document this could take the construction corridor to 150m.

9. The maths is frightening. If we combine the evidence given by NGV with EA1N and EA2 then East Suffolk is looking at total possible construction corridors for projects with agreed connection points to the grid at Friston (EA1N, EA2, Nautilus and Eurolink), of somewhere between 200 - 300m wide.

10. This is a massive expanse of land. When you add it all up together the impact on our environment and communities can be nothing other than devastating. Yet the scale of this impact remains unassessed and ignored despite 6 months of numerous Interested Parties bringing it to the Examiners, SPR's and National Grid's attention. Clearly the impact of this onshore construction is too great on both our environment and rural communities.

11. The landfall site for Nautilus and Eurolink has not been shared within the Examination. But the National Grid briefing pack[2] gives four options (see image below). All these options cut through the fragile cliffs between Thorpeness and Sizewell.

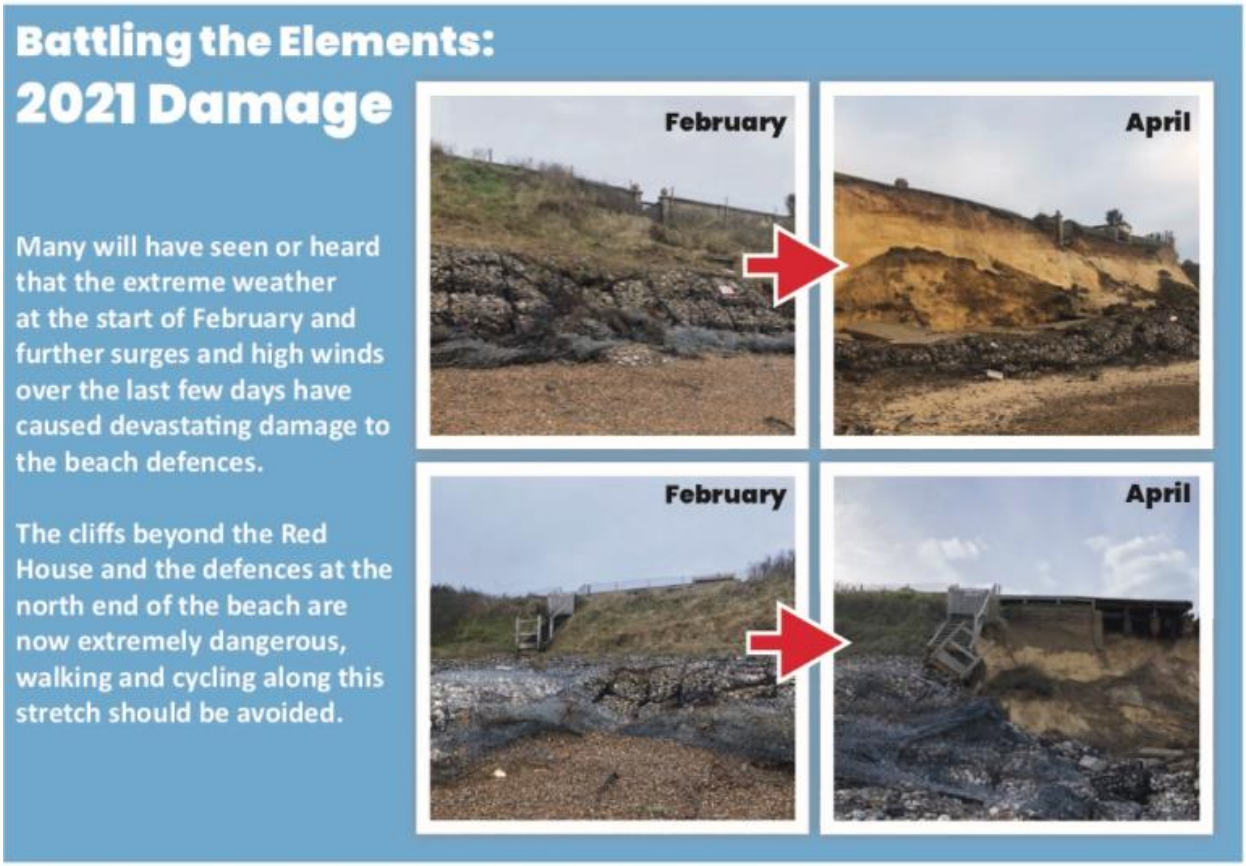
[2] National Grid Nautilus Interconnector Briefing Pack, July 2019
https://www.nationalgrid.com/document/125601/download

12. **There is a serious, urgent and growing problem of coastal erosion at Thorpeness with tremendous local concern about the fragility of these cliffs.**

13. The images below were published in the Thorpeness Coastal Futures Group[3] Newsletter.

> *"the extreme weather at the start of February and further surges and high winds over the last few days have caused devastating damage to the beach defences. The cliffs beyond the Red House and the defences at the north end of the beach are now extremely dangerous, walking and cycling along this stretch should now be avoided."*

[3] Thorpeness Coastal Futures Group Newsletter



14. With the new extensions to the Examinations, there is surely both an opportunity and a necessity for a comprehensive CIA of the construction corridor and landfall site.

15. The only information SPR uses in its assessment is the Nautilus Interconnector Briefing Pack.[4] This publication is now over 18 months old. In the course of the last 18 months, according to SoCG with National Grid Ventures (REP8-113), there have been 6 meetings between SPR and NGV. SEAS believes that during these meetings, discussions and decisions must have moved forward and information should be made available to feed into a full CIA assessment.

16. What is quite clear is that whatever landfall site, substation site and cable corridor route is chosen to arrive at Friston, the Thorpeness cliffs, the Suffolk AONB, the Suffolk Sandlings, and the River Hundred will be once more gouged in two, our communities once more subjected to mental stress and our progressively fragile tourist economy further undermined. These critical impacts should be fully assessed by SPR to provide the required CIA. This will only happen if the Examining Authorities insist that the developers provide full information into the Examination.

[4] Nautilus Interconnector Briefing Pack, National Grid Ventures, July 2019, https://www.nationalgrid.com/document/125601/download

(ii) Cumulative Construction Impacts should be properly assessed

17. According to NGV's timeline in the Nautilus Briefing Pack, construction of Nautilus is due to commence in 2025 and be completed in 2028. Yet in their Extension of National Grid Substation Appraisal submission (REP8-074), SPR 'create' their own assumptions about dates and start times which perhaps suit them better:

> "*the earliest construction start date would be 2026*" and the "*starting assumption of this appraisal is that the projects are operational*."

18. By stating that the earliest start date of Nautilus is 2026 (and not 2025 as NGV has stated) and by making their own assumption that Nautilus will not begin until EA1N **and** EA2 are operational **they justify negating ALL cumulative operational impacts.**

19. This is nonsense. Firstly because they have used the incorrect date in making this assumption and secondly it is highly unlikely that SPR's EA1N **and** EA2 will be operational by 2025. In fact, SPR's own timeline states 2026 as their completion date[5].

20. With the new Examination extension, it is not inconceivable that SPR will miss the fourth CfD allocation round in 2021. If, as has been the pattern before, a CfD is then not held for a further two years it could be late 2023 before the fifth CfD allocation. This still leaves final investment decisions which could take a further 2 years[6].

21. It is almost certain that the construction of EA1N and/or EA2 will overlap with Nautilus and/or Eurolink and full cumulative construction impacts should be properly assessed with regard to the substation site, the cable corridor and the landfall site.

C NORTH FALLS WINDFARM PROJECT

22. We do not agree with the Applicants position on North Falls Offshore Wind Project. The Applicant state:

> *"It has been confirmed by both the proposed North Falls (REP7-066) and Five Estuaries projects that they **will not** connect near Leiston" [emphasis added]*

23. This is incorrect. REP7-066 states:

> "*I write to you as the Project Manager from North Falls Offshore Wind Farm Ltd (NFOW) who have seabed rights to develop an offshore windfarm in the southern North Sea (https://www.northfallsoffshore.com/). It may be of interest for you to know that at present NFOW **does not have a confirmed grid connection***

[5] https://www.scottishpowerrenewables.com/pages/east_anglia_timeline.aspx
[6] REP8- 074 Extension of National Grid Substation Appraisal (See Footnote 2)

> ***location*** *onshore, we currently appear in the National Grid ESO TEC register with an offshore connection location and a connection date in 2030. We (NFOW) can confirm that we do not* ***currently*** *have any plans to progress any work around Friston, Suffolk. You should also be aware that the NFOW project is currently not at a very advanced stage in the planning process (i.e. request for scoping opinion has not yet been issued) and as such there is very limited information regarding our project in the public domain which others could utilise to inform their own assessments."* [emphasis added]

24. As outlined in our Deadline Submission (REP8-242), this letter from NFOW does not rule out consideration of Friston as a grid connection. Given that NFOW has not confirmed or even suggested any other grid connection, it is quite possible that if EA1N and EA2 are consented, Friston will become a confirmed grid connection location. Certainly no evidence has been submitted to support any other grid connection location; on the contrary, East Suffolk Council, have consistently said that a connection offer is likely to be made to North Falls. Whilst there is no certainty that this project will connect to the Grid at Friston it is not possible to exclude it as a reasonably foreseeable possibility.

25. It is hard not to conclude that this information has been carefully crafted and submitted into the Examination at the request of SPR in their attempt to justify their position that:

> *"... projects have not been included within each CIA due to insufficient information available on which to base an assessment."* (REP7-056)

26. SEAS believes that based on the information available, the Applicant should provide a cumulative impact assessment of North Falls Offshore Wind project.

D ADVICE NOTE 17

27. The Applicant consistently excuses their lack of CIA with the justification that their approach is in accordance with the Planning Inspectorate Advice Note 17 (Planning Inspectorate 2018). SEAS believe that Advice Note 17 does not justify the approach taken by the Applicants. Advice Note 17 does not advise that projects in Tier 3 should be left unassessed. It advises that for projects in Tier 3

> "*the applicant should aim to undertake an assessment where possible*".

28. Similarly, the Applicant uses Advice Note 17 to justify their lack of CIA with the statement that:

> "*little to none of the information specified in Advice Note seventeen is available .... with no information on, for example, the project design, and timescales*. (REP8-114)

Certainly this is not the case with Nautilus with a timeline linked from their website.

29. SEAS believe that a proper CIA should be undertaken which takes all future projects likely to connect to the grid at Friston into account.

E SPR ARE REQUESTING EXTRA LAND FOR EA1N AND EA2

30. SEAS would like to draw to the attention of the Examiners the following quote from the Extension of National Grid Substation Appraisal (REP8-074):

> *"The National Grid substation extensions would enlarge the footprint of the National Grid substation. However the extensions would predominantly be located on land acquired for the Projects, extending only into a single agricultural field ...".*

31. The Applicant has consistently stated that they are only seeking consent for the works necessary to connect their respective projects to the Grid. This does not marry with the reality that there appears to be almost enough land within the current DCOs for Nautilus and Eurolink to make their connections to the grid. This should not be allowed and we believe SPR should be brought to account on this issue.

32. This adds weight to the commonly held belief that the Friston site has been designed by SPR and National Grid with an Energy Hub in mind.

F OBFUSCATING

33. It is a sad reality that still at this late stage National Grid in its various guises and SPR are obfuscating.

34. Even just within their Deadline 8 Submission NGESO state *"There is no planned strategic connection hub at Leiston and so no network planning assumptions have been made in respect of this" NGESO.* SEAS believe that NGESO is highly likely to be able to provide updated information as to further grid connections at Friston which should be incorporated into a CIA.

35. SEAS believe National Grid Ventures, who are already undertaking site surveys in the area would be able to provide vital information as to their proposed cable corridor to feed into a full CIA of Nautilus and Eurolink.

36. And finally, the comments made by the Applicant, in their Submission of Oral Case (REP8-095)

> *"The Applicants have no connection to National Grid Ventures (NGV) or its projects. The Applicants had no knowledge of NGVs projects at the point of its site selection (and still have very limited information on NGVs projects)."*

G CONCLUSION

37. SEAS disagrees with the Applicants statement:

> *"the Applicants have, to the extent possible on the basis of information currently available, provided a cumulative assessment of all foreseeable developments."* (REP8-095)

Critically, the Applicant has failed to provide a full and rigorous CIA of Nautilus and Eurolink and has made no attempt to provide a CIA for SCD1 and North Falls. This is in their favour since if they did it would become clear that the devastating impacts far outweigh the benefits of this Application.

End