Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

SEAS additional comments on NGET and NGESO non attendance at Issue Specific Hearings 1 & 2 Deadline 3 – 15 December 2020

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

Unique Ref. No. EA2: 2002 4496

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DEADLINE 3 SUBMISSION
SEAS additional comments on
NGET and NGESO non attendance
At ISH1 & ISH2 - 2, 3 & 4 December 2020

SEAS would like to register its continuing disappointment that National Grid Electricity System Operator (NGESO) and National Grid Electricity Transmission (NGET) failed to attend the Issue Specific Hearings (ISHs) and to answer questions posed by the PINS Examiners in person. We have consistently stated that given National Grid is behind the choice of site and the scale of the site that they should be directly responsible for answering questions relating to the original choice of site, the cumulative impact and the requirement for so much land.

As Naomi Gould from East Suffolk Council stated in the last written representations:

"ScottishPower is the anchor tenant for the strategic connection to the Grid".

We used the analogy of the Russian Dolls to help visualise the nature of what is going on. Over the last 18 months, a succession of projects has been unveiled and revealed and we now count eight wind energy infrastructure projects for this small area. They are defined as per Appendix One of our Written Representation submitted at Deadline 2. [1]

We continue to believe that National Grid is trying to build the largest industrial complex of this kind in Europe by stealth, because they know that it would be difficult to gain planning permission if they were open and transparent with the scale of what they are planning. By slipping the National Grid DCO into the ScottishPower Renewables DCO application, it is akin to a Russian Doll being hidden inside another Russian Doll and another and another.

[1] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002779-DL1%20-%20SEAS%20(Suffolk%20Energy%20Action%20Solutions)%20Campaign%20Group.pdf

The major issues that we wish you to address are:

1. We continue to believe that the site selection process was flawed. The RAGS assessment was flawed. We now know that the CION process is also flawed. Redacted documents pointed to an alternative site as a fallback. This other site was Bramford. [2] [3]

We have seen no evidence from ScottishPower Renewables or National Grid, that Friston is the best site for these projects. We believe that the evidence presented by SASES, Natural England, DMO and SEAS relating to Biodiversity, Friston heritage, landscape and regional Tourism indicates that the adverse impacts outweigh the benefits of this particular onshore site. We are not challenging the offshore site locations, but just the onshore location.

2. We are certain that the cumulative impact of these ten infrastructure projects which includes Sizewell C is "too great a burden" (Aldeburgh Society) for this small area. National Grid should stand up and be counted. For a major cluster or hub of substations and inter-connectors of this unprecedented scale, it would be tantamount to criminal negligence if they do not have to answer questions directly. PINS Examiners must call upon the Secretary of State to request that National Grid attend the next ISHs in person and also answer the specific questions addressed to National Grid, before then in writing. The devil is in the detailed answers.

ScottishPower has failed to acknowledge all ten infrastructure projects in its representations. This means that none of their studies relating to Biodiversity, Habitats, Tourism, Transport, Air quality are valid. They all underestimate the period of construction works and are based on 2/3 years impact, rather than 12 to 15 years.

[2] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002768-DL1%20-%20SASES%20-%20Written%20Representation%20Site%20Selection.pdf

[3] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002501-DL1%20-%20Suffolk%20Energy%20Action%20Coalition%20(SEAC)%20-%20Deadline%20Submission.pdf

We continue to state that until the cumulative impact definition is agreed, these Examinations are not viable because we are not in agreement about the basis of the application.

3. The specific design of the National Grid substation uses AIS for its insulation system, not GIS which is proposed by SPR. We are curious as to why they propose different systems. We know that AIS is a much bulkier system and takes up more space, more land. National Grid may have chosen this system in order that they can switch to GIS at a later date and free up more land for more projects. The fact that they refuse to elaborate means that we suspect the worst case and we become suspicious of their intentions. We would also note that GIS is being phased out by the EU because it is deemed to be high risk; in the event of a leak, it would be catastrophic. It uses SF6, the most potent man-made greenhouse gas. It is entirely possible that National Grid has chosen the safer system and it is ScottishPower that has chosen the wrong, more high-risk system. SEAS believe that it is important to fully understand the reasoning behind the different insulation systems as they need to be “future proofed”.

End