

**SEAS Response to National Grid Ventures (NGV's)
consultation on Nautilus Interconnector
25 October 2021**

We wish to thank National Grid Ventures (NGV) for conducting these pre-application consultations. They have been a useful way of exchanging views. We are however, disappointed that NGV failed to hold consultations in Aldeburgh, which will be directly and indirectly adversely impacted by any of these plans and also curious to understand why Snape was not included in these consultations given the fact that one of the sites is located within the Snape Parish and is the largest site of them all (CSA1).

The questionnaire does not present neutral questions so we are responding in writing and using our own observations to info@nautilusinterconnector.com

The new vocabulary: rhetoric without any concrete proposals

1. SEAS are fully in favour of integration both offshore and onshore and have been calling for coordinated solutions for the last two years.
2. We welcome the additional flexibility that MPIs could potentially give.
3. However, as things stand, the plans for Nautilus as an MPI have no practical application. NGV's literature does not show any integration with EA1N or EA2. In fact, the plans presented at the consultations show no real-life integration whatsoever, they simply present an attractive scenario whereby an MPI might potentially reduce the amount of infrastructure necessary in both the marine and terrestrial environment.
4. If this rhetoric is not matched by concrete proposals to integrate Nautilus with offshore wind projects then there will be no reduced impact on the coastal community and the environment and the concept of NGV's MPI becomes nothing more than a meaningless PR stunt to appease the community and the BEIS Offshore Transmission Network Review Team.



Integration in itself is not enough

5. To protect the economies and environments of rural coastal communities, integrated projects **must** be brought ashore away from our Areas Of Outstanding Natural Beauty and protected environments in brownfield industrialised areas. Even with integration, (and we read with interest the news that NGV is in talks with regard to a [North Sea energy island](#)), there has to be consideration as to where the cables come ashore and where the onshore infrastructure is sited.

The adverse impacts outweigh the benefits of any sites selected in this area

6. In short, we are not in favour of any of the onshore routing and converter siting options that have been presented at these events. The following factors have clearly not been taken into account when looking at the siting of Nautilus infrastructure:

6.1 Landfall Sites Landfall on a fragile coastline of coralline crag near Thorpeness (which is sand-based and already crumbling) or across bird sanctuaries close to Aldeburgh beach. Each of the landfall options are within Suffolk Coast and Heaths AONB and as such should be protected from damage by energy projects.¹

6.2 Environmental and Community Impact Cable routes to run for approximately 9 km through the Suffolk Coast and Heaths AONB (Area of Outstanding Natural Beauty), the Leiston-Aldeburgh SSSI (Site of Special Scientific Interest), the Sandlings SPA (Special Protected Area) and rural villages to connect to a converter station with a height of up to 24 metres over a site of 12 acres. Intolerable noise pollution, light pollution and air pollution to local communities, wildlife and livestock. The landscape will change forever.

¹SEAS LANDFALL SUBMISSIONS SUBMITTED INTO THE EXAMINATIONS OF EA1N AND EA2

- SEAS Additional WR on Landfall Site and cable corridor route around Ness House Deadline 13, 5 July 2021
- Landfall assessment and horizontal directional drilling, SEAS Deadline 3 Submission
- Thorpeness cliffs and the Coralline Crag, SEAS Deadline 2 submission

6.3 Biodiversity Biodiversity will be negatively impacted. This area is rich in biodiversity, for example there are 876 species identified at the River Hundred. The M11 width cable trench routes will destroy the wildlife corridors and cause unimaginable ecocide.²

6.4 Nature based tourism Research commissioned by the [Suffolk Coast Destination Management Organisation](#), suggests that new energy projects on the Suffolk coastline could damage one of the UK's most successful nature based tourism centres by up to £40 million per annum. This will crucially lead to loss of jobs in hospitality and other tourist related businesses. Visitors will no longer come to the highly regarded and commercially successful tourism destinations of Aldeburgh, Thorpeness and Snape for their short breaks and holidays if the main arterial roads (on which local communities are also dependent), already

² SEAS BIODIVERSITY SUBMISSIONS SUBMITTED INTO THE EXAMINATIONS OF EA1N AND EA2

- Habitats and Biodiversity, SEAS Deadline 13
- Habitats and Biodiversity, SEAS Deadline 12
- Habitats and Biodiversity, SEAS Deadline 11 Submission, Appendix 3 Video, Appendix 4 Video, Appendix 5 Video
- BEIS Review of Consents for Major Infrastructure Projects and Special Protection Areas, SEAS Deadline 11 Submission
- Serious deficiencies in the 2018 Surveys, SEAS Deadline 9 Submission
- A request for ExA to instruct the Applicant to carry out fully independent surveys by fully qualified and chartered ecologists before the end of the examination, SEAS Deadline 9 Submission
- The case against open trenching of the River Hundred, SEAS Deadline 8 Submission
- The quality of biodiversity surveys, SEAS Deadline 8 Submission
- Nightjar and woodlark of the Sandlings spa, River Hundred Crossing, SEAS Deadline 8 Submission
- River Hundred woodland, SEAS Deadline 8 Submission
- Terrestrial ecology, SEAS Deadline 6 Submission
- River Hundred's riparian woodland, SEAS Deadline 6 Submission
- Incompleteness and inaccuracy of the Applicant's survey re: River Hundred and its riparian environment, SEAS Deadline 5 Submission
- Broadleaved woodland and microtunneling, SEAS Deadline 3 Submission
- Habitats and Biodiversity, SEAS Deadline 2 Submission

congested at peak times, become gridlocked with HGVs carrying materials for construction for what is destined to be the largest energy infrastructure hub in the UK. The DMO forecasts could be optimistic and the job losses could be greater due to the cumulative impact of ten years of construction. This cumulative impact was not fully taken into account because the DMO was not made aware by NationalGrid of the extent of the plans.³

6.4 Cumulative Impact Combined with Sizewell C and EA1N/2, the cumulative impacts will lead to considerable industrialisation of East Suffolk. The 'Leiston area' will become a substantial complex of industrial scale infrastructure in the midst of unspoilt rural Suffolk.⁴

7. It is obvious to anyone visiting this area that the adverse impacts will outweigh any benefits to this region. Quite simply a catastrophe for the Suffolk Coast and Heaths and the people living within it.

³ SEAS TRAFFIC, TOURISM AND ECONOMIC IMPACT SUBMISSIONS SUBMITTED INTO THE EXAMINATIONS OF EA1N AND EA2

- SEAS Submission on the Adverse Impacts on Tourism, Deadline 13 5 July 2021
- SEAS Response to the Applicant's reply to Roads/Traffic and Tourism REP9-014 & REP6-064, 5 July 2021
- Roads, Traffic and Tourism, SEAS Deadline 8 Submission
- Roads, Traffic and Tourism, SEAS Deadline 5 Submission
- Roads, Traffic and Tourism, SEAS Deadline 5 Submission
- Roads, Traffic and Tourism, SEAS Deadline 2 Submission
- Roads, Traffic and Tourism, SEAS Deadline 1 Submission

⁴ SEAS CUMULATIVE IMPACT SUBMISSIONS SUBMITTED INTO THE EXAMINATIONS OF EA1N AND EA2

- SEAS Submission Final Submission Re: Cumulative Impact, 6 October 2021
- SEAS Supplementary Submission on Cumulative Impact Deadline 13 – 5 July 2021
- Cumulative Impact, Evidence from National Grid, SEAS Deadline 11 Submission
- Cumulative Impact, SEAS Deadline 9 Submission
- Cumulative impact, SEAS Deadline 8 Submission
- Norfolk Vanguard and cumulative impact, SEAS Deadline 6 Submission
- Cumulative Impact, SEAS Deadline 5 and Deadline 1 Submission
- Cumulative Impact, SEAS Deadline 4 Submission
- Cumulative impact, SEAS Deadline 3 Submission
- Cumulative impact, SEAS Deadline 2 Submission
- NGESO and NGETS, Deadline 2 Submission

NGV reveals an alternative site - without naming the name

8. Listening to NGV's online webinar and looking at their questionnaire it has become clear that NGV are exploring a grid location within Suffolk Coast and Heaths AONB at Sizewell. As their questionnaire says:

"we are reviewing whether it is appropriate to consider opportunities to locate some of the proposed infrastructure in areas of the AONB which are already characterised by existing industrial development

"Do you agree that it would be beneficial to co-locate development to form clusters within the AONB ...

"Do you think that consideration should be given to locating developments in areas of the AONB which are already characterised by industrial development?"

Areas of AONB 'already characterised by industrial development' were also mentioned to local residents in meetings as an alternative site for Nautilus.

These are quite clearly references to Sizewell.

9. To be clear, we oppose this idea. Aside from the fact that EDF owns much of the land here, AONBs are protected landscapes and not magnets for industrialisation. Relaxing regulation and consolidating development within an AONB would obviously be in the interests of energy companies but would be a dangerous precedent.

Numerous alternative site options exist and should be seriously considered

10. There are numerous site options on existing brownfield sites, some of which are in need of regeneration and others which already have substation developments. The cost barriers mentioned in the last two years are not barriers given the scaling up of the UK's targets for wind energy to over 40GW by 2030. Pylon upgrades are no longer a barrier. The time barriers are no longer barriers because split decisions allow the construction of offshore wind farms to proceed apace whilst better, greener onshore



solutions are designed. The UK has lacked a spatial strategy for wind energy infrastructure and an ad hoc approach has been the order of the day. National Grid ESO has moved at a snail's pace for the last ten years, reluctant to make the necessary step change to more advanced integrated solutions. That does not excuse a frenetic charge towards the wrong site selection for these connectors. We have explored a number of sites and we give just two examples here of sites which should be considered but there are others situated closer to London and to the shoreline.

10.1 Bradwell As the Rt Hon Dr Therese Coffey, our local MP, has consistently proposed, Bradwell is the site of a redundant National Grid Substation, a wasteland in need of regeneration.

“The long-term capacity of Bradwell as an integrated Wind Energy Hub has significantly greater potential than the Friston site. It is closer to London and on the coast thus negating the need for cable corridors to be dug and re-dug with every future wind farm project attempting to connect to the Grid. It is a brownfield site and in need of development”

Therese Coffey MP [[Rep10-070](#)].

Whilst Bradwell would need investment in the onshore grid to accommodate offshore energy, these expenses might well be more than offset by the savings made offshore. As [NGESO](#) concluded,

“Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion.”

10.2 Isle of Grain An existing industrialised substation site on the coast which would result in significantly less environmental and socio-economic damage. Its proximity to London and the Kent connections for export to other North Sea Countries means the power is brought onshore close to centres of demand. Grain was the original preferred option for Nautilus according to the presentation given by National Grid Ventures in November 2018 to the Suffolk Coast and Heaths AONB. We understand that GRAIN is a busy area but the idea that it is already 'too congested' to consider future connections is unconvincing.

11. With the ongoing BEIS Offshore Transmission Network Review, there is an opportunity for all developers to 'opt in'. Not only to present integrated offshore solutions but also to present environmentally and community sensitive projects (in the



case of Nautilus a grid connection on a brownfield site) in line with the government's policy to:

"safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs." [Energy White Paper Powering our Net Zero Future](#)

Take responsibility

12. Throughout the consultation events there has been a continual attempt to pass the buck, particularly with regard to National Grid Electricity System Operator (NGESO) and grid connections. Whilst NGESO has the final say with regard to grid connections NGV's input is considered within this decision.

13. On several occasions we heard NGV lament the difficulty of getting NGESO around the table, absolving themselves of all responsibility. Yes, NGV is a separate company, but let's be clear: they talk about being part of the same 'group'; they share the same website, and communication is obviously taking place at a high level between NGESO and NGV.

14. If NGV is truly committed to protecting rural coastal environments then they must take responsibility for bringing forward a grid connection that will form the basis of a new strategic framework for onshore infrastructure. On a brownfield site.

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