

SEAS Response to National Grid Ventures (NGV) Supplementary Non-Statutory Public Consultation on the LionLink Interconnector

We are writing in response to the recent LionLink Consultation rather than filling out your questionnaire which does not address our concerns. Nothing of significance has changed in the proposals for this supplementary consultation, since the 2022 Eurolink consultation, apart from a cosmetic name change and two further proposed unsuitable landfall and cable routes (one in Reydon and one in Walberswick).

Suffolk Energy Action Solutions (SEAS) is extremely disappointed, we disagree with LionLink's consultation materials, NGV have not taken into account or addressed the points raised from the first Eurolink consultation. In particular, we are aware from our large supporter base that a large number of responses were not adequately considered. These responses opposed the onshore plans and requested that an alternative offshore transmission network design option, with brownfield landfalls, was considered.

Suffolk Energy Action Solutions (SEAS) community group, stand by our response to the Eurolink non-statutory consultation of December 2022 ([SEAS Eurolink Response Dec22](#)), which we append to our response here (Appendix 1) and request that you take into account all of its points in relation to this LionLink consultation.

NGV have presented another superficial desk top study with great disregard to the residents of Suffolk Coastal. This lack of in-depth research one year on suggests that NGV are either not doing the job required or are reliant on local knowledge relating to terrain, flood risk, ecology, and more. NGV representatives (including those from your PR agency) were ignorant of the area and lacked the knowledge to answer detailed questions. As a result, the consultation events have largely been about a one way "tell and sell" process. A consultation should involve a genuine exchange of ideas and listening, responding and integrating inputs into a better way forward for all concerned.

The most disturbing insight was at the conclusion of the Leiston consultation, a National Grid representative said to a Reydon resident: "Yes, it has been a good turnout, probably 50% of those attending were in favour of these proposals but wished to remain anonymous." This was patently untrue. SEAS knew c.90% of those attending and they are active supporters of local campaigns against current plans. A distortion of the facts in this context suggests that other misrepresentations could be taking place.

1. Offshore Alternatives

SEAS are in favour of offshore wind energy but reject LionLink's current plans for onshore infrastructure that will needlessly damage the Suffolk Coastal environment and local tourism-based economy. At the consultation we were disappointed that no real alternative options for transmission network design were being discussed, only the details of landfalls, cable routes and substation/converter station placement for a small range of options all coming onshore on the Suffolk coast.

NGV's consultation is fundamentally flawed, having closed down alternative offshore transmission network options. These need to be revisited and consulted on, giving the public sufficient information to have a fair opportunity to evaluate offshore alternatives.

Previous reasons given for discounting these options do not justify excluding them from the category of “reasonable alternatives” for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This refers to the same legal point as raised in Charles Banner's recent [KC opinion](#) on the second non-statutory Norwich to Tilbury consultation.

What this means for LionLink is that the current consultation (and similarly the first Eurolink) cannot be relied on at any statutory consultation stage. There is a real risk that the legal deficiencies in the current consultation will impact the later statutory consultation, which would in turn mean that the intended DCO application cannot lawfully be accepted by the Planning Inspectorate.

The excuse (from the consultations) that Friston is the connection you have been given, is not a valid reason to exclude other options, as Friston is not a done deal, with JRs coming up on 5/6 December and another in January 2024 challenging the Friston plans.

In addition, we point you towards NGET's Electricity Act Duties (Schedule 9), in which it is obliged to build new lines and substations only where the existing transmission infrastructure cannot be upgraded. Brownfield sites should be considered e.g. Bradwell-on-Sea where there is existing infrastructure that can be upgraded.

2. Onshore Impact

Coordinating LionLink's and SeaLink's onshore infrastructure does not compensate for the destruction of protected sites within the AONB. This is simply onshore co-location not offshore integration and most importantly not part of a coherent spatial strategy.

The current proposed radial connections go against the principles for offshore transmission network design recommended in numerous reports by National Grid ESO (e.g. Pathway to 2030, July 2022), that greater offshore integration means asset cost savings and reduced impact on environment and communities. In addition, taking power closer to demand reduces constraint costs.

All the proposed landfall sites, cable routes and infrastructure locations would be enormously damaging for the habitats and species of the Suffolk Coastal area (AONB, SSSIs, SPA and RAMSAR), and to prime farming land and the health of communities, with many routes subject to flood risk (as recent evidence shows) and road networks not fit for purpose (the A12 and A1094 would be gridlocked), leading to a significant reduction in tourism-related jobs. Each of our affiliated local community groups has highlighted in great detail their ecology concerns, relating to their specific areas, North Warren, Buss Creek, Walberswick Marshes and more.

To repeat, none of LionLink's proposed options are suitable. No amount of community benefits can compensate for the long-lasting devastation they will cause.

3. The Better Solution

There is a better offshore solution, LionLink should pool its energy with the energy from wind farms (e.g. EA1N/EA2), taking this energy offshore closer to where it will be used in London/South East, with landfall and onshore infrastructure at a brownfield site (e.g. Bradwell-on-Sea), precisely as the Dutch are doing at their end of LionLink (landfall at Rotterdam). The same transmission network design is being executed by Belgium, Holland and other leading European wind power countries. This is the cheaper, quicker and better solution, with vastly reduced impact on the environment and communities.

Bradwell-on-Sea is a better site for onshore infrastructure

- NGET's Electricity Act Duties (Schedule 9), oblige it to build new lines and substations only where the existing transmission infrastructure cannot be upgraded.
- NPS EN-5 requirements, paragraph 2.8.10: "consideration of network reinforcement options (where alternatives exist) which may allow improvements to an existing line rather than the building of an entirely new line".
- At Bradwell-on-Sea there is already a line of disused 132kv pylons and a disused substation that can be upgraded. Bradwell should be considered for its existing transmission infrastructure as a landing point for North Sea wind power
- NGET has included Bradwell-on-Sea in its strategic options backcheck & review (EAS3) and does say that the Essex Generation Group could connect direct into Bradwell-on-Sea.
- Upgrading the existing infrastructure is cheaper than building new onshore infrastructure and would be subject to few (if any) planning delays.

Pilot Projects

NGV's Nautilus interconnector is planning to pool energy with the North Falls and Five Estuaries wind farms and to take the energy subsea to the brownfield site of West Grain, the first pilot project of this kind ('Pilot 1'). This is evidence to support the rationale for a second pilot ('Pilot 2') involving LionLink pooling with EA1N/EA2 offshore and going onshore at a brownfield site closer to London/South East. For further evidence, what's needed is for National Grid ESO to evaluate a comparison between Bradwell-on-Sea and Friston as onshore locations, updated from the original and now outdated 2017 analysis, with a full HND style Cost-Benefit analysis of these scenarios (including Pilot 2 with current prices), evaluated over the lifecycle of the projects.

Action Requested

We urge National Grid Ventures to consider alternative offshore solutions, to speak to Scottish Power Renewables about pooling offshore, and to ask National Grid ESO and the Department for Energy Security and Net Zero to facilitate and incentivise Pilot 2 for the benefit of all stakeholders.



Fiona Gilmore

On behalf of SEAS, 2 November 2023

Appendix 1: SEAS Response to National Grid Ventures (NGV) consultation on Eurolink Interconnector 18 December 2022

SEAS wish to thank National Grid Ventures (NGV) for initiating these events and actively encouraging engagement. We are however, disappointed that NGV failed to provide anything more than desk top studies and their representatives were ill-informed about the area and contextual issues. The questionnaire does not present neutral questions therefore we are responding in writing and using our own observations to info@eurolink.nationalgrid.com

The new vocabulary: rhetoric without any meaningful holistic plan

1. SEAS are fully in favour of the increased generation of offshore wind generation and since 2019 have proposed integrated offshore solutions using brownfield sites closer to demand, based on the Belgium model created by ELIA using a Modular Offshore Grid (MOG).
2. These plans for Eurolink and other projects such as Sea Link and Nautilus are disjointed and tactical responses to criticisms made by communities directly and indirectly threatened, regarding random radial connections across East Anglia.
3. The starting point for a spatial strategy is to draw a map of the wind farms and the destinations for that power in terms of dense urban populations. The subsea cables and brownfield sites are next identified in order to carry that power in the least environmentally damaging way to brownfield sites in need of renovation. Superhubs are essential. Brownfield sites offer the future scope and flexibility to store power in many formats and should be selected before any more projects are given the go ahead. This spatial strategy and master plan has been absent from the current proposed plans. National Grid ESO gave connections to the grid without this spatial strategy and hence we are now responding to opportunistic proposals made by NGV and NGET to appease frustrated and alarmed communities. These proposals are flawed from within.
4. National Grid has failed to initiate a master plan and in lieu of that, these projects are proudly promoted as a “coordination” package, a trophy, whilst they are in real terms, not answering the priority questions:

Where are the wind farms?
How can we pool their energy at sea?
How can we integrate at sea?
How can we use brownfield sites for super hubs?

This product led, developer led culture is forcing bad plans in the wrong locations to be presented as good news.

5. ‘Coordinating’ Eurolink and Sea Link’s multiple cables at one landfall does not compensate for the destruction of protected sites within the AONB. This is co-location not coordination and most importantly not part of a coherent spatial strategy.

6. These “coordination” scripts are hollow words. 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.

‘Coordination’ in itself is not enough

7. To protect the economies and environments of rural coastal communities, coordinated/colocated projects **must** be brought ashore away from our Areas of Outstanding Natural Beauty and protected environments at brownfield industrialised sites closer to where the power is needed. Even with ‘Coordination’, there has to be greater 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

8. 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 Eurolink infrastructure:

8. 1 Landfall Sites proposed at Aldeburgh (E), Dunwich (H), Walberswick (G) and Reydon/Southwold (F): are unacceptable, due to their environmental impacts and length of cable routes through sensitive landscapes,

8. 1.1 Subsea cables coming into Landfall on the fragile coastline of Suffolk Coastal during construction or over their lifespan will have a devastating effect on Suffolk’s unique Coralline Crag. It is believed that there is no other such geological formation of marine deposits in the world. The Suffolk Coast is dependent on the Coralline Crag as a sea defence, and with climate change sea rises and tidal surges, NGV must investigate the likely damage to the coastline and coastal communities.

Suffolk’s eroding cliffs are composed of Norfolk Crag, a friable compacted sand-based formation especially at Dunwich and Thorpeness. SEAS has submitted previous papers detailing these risks and SEAS has taken BEIS, NGV and NGET representatives to see this fragile shoreline for themselves in September 2022. ¹

8.1.2 Each of the landfall options are within Suffolk Coast and Heaths AONB or other nationally designated sites and as such should be protected from development as is written in the National Policy Statements EN1 and EN3.

a) The Overarching National Policy Statement for Energy (EN1), paragraph 5.9.9, states:

‘Development proposed within nationally designated landscapes National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC

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](#)

[Now Planning Inspectorate] should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC [Now Planning Inspectorate] in deciding on applications for development consent in these areas.'

b) The National Policy Statement for Renewable Energy Infrastructure (EN-3), paragraph 2.5.33 states:

'In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.'

c) The draft National Policy Statement EN-5 on Electricity Networks Infrastructure States in para 2.11.11:

'The Horlock Rules – guidelines for the design and siting of substations were established by National Grid in 2009 in pursuance of its duties under Schedule 9 of the Electricity Act 1989. These principles should be embodied in Applicants' proposals for the infrastructure associated with new overhead lines' And goes on to say:

'....seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections.'

NGV need to clearly demonstrate their justifications for their current plans.

8. 2 Cable routes

M11 sized HVAC and HVDC cable routes to run for approximately 9 km and in some cases 25 km through the Suffolk Coast and Heaths AONB;

- RSPB North Warren nature reserve at Aldeburgh;
- Leiston SSSI and Sandlings SPA at Sizewell;
- AONB, RAMSAR, SSSI site and eroding cliffs at Dunwich;
- AONB and SSSI at Walberswick Beach
- AONB salt-marshes at Reydon and Southwold.

NGV should adhere to the National Policy statements EN-1, EN-3 and EN-5 as noted in 8.1.2 above and need to clearly demonstrate their justifications for current plans.

In SEAS opinion NONE of these sites would in any way be acceptable. There is no mitigation that would go far enough to compensate for the priceless loss. The landscape and environment will change for at least 25 years and there will be flora and fauna that will be lost permanently on this rare lowland heathland.

8. 3 The convertor sites

Eurolink's briefing document states that a convertor station's typical footprint covers an area 12 acres with an additional 2 hectares for the construction service area. However, there is no guarantee the stations will not be bigger until the design stages, which can be after consent.

8. 3.1 Site 1 – Aldeburgh (Blackheath Corner)

SEAS agrees with the AONB Partnership that structures such as convertor stations should not be located in nationally designated landscapes as they should be considered as major development.

This site is too close to the A1094 the main arterial road to Aldeburgh, which runs along the northern side of the boundary of the Suffolk Coast and Heaths AONB. The site is within 2km of the Alde-Ore Estuary SSSI and RAMSAR sites, the Sandlings SPA, North Warren RSPB Reserve, Snape Warren SSSI, the Alde-Ore & Butley Estuaries SAC to the south, and further smaller SSSI sites. It is also adjacent to Great Wood, an ancient woodland. For all these reason Site 1 is not a suitable site.¹

A development of the proposed scale would not conform with national policy or contribute to the statutory purpose of the AONB.

8. 3. 2 Site 3 - Saxmundham

Suffolk is one of the main food producing regions in the UK. If Saxmundham convertor substation site's footprint is 12 acres of prime agricultural land, add to that, 12 acres for Sea Link's, another 12 acres for Nautilus (should it be reverted) and Friston's National Grid and Scottish Power Stations of 30 acres with its addition area over 100 acres required for sealing compounds, surface water drainage ponds, screening/planting and the associated substations for Eurolink, Sealink and Nautilus, that is a large loss of productive agricultural land.

These incremental amounts of agricultural land being used for renewables are seriously jeopardising the UK's food security.

8.3.3 Site 4 -Theberton

Site 4 is also on prime agricultural land and is also on the front line of Sizewell C's haul road that will carve its way through more agricultural land just north of the site. Unnecessary desecration of landscapes, farming land and communities must be considered more thoroughly and in this particular case, the cumulative impact.

¹ <https://www.suffolkcoastandheaths.org/wp-content/uploads/2022/12/AONB-Partnership-Response-Non-Statutory-Consultation-EuroLink-December-2022.pdf>

8.3.4. Site 5 – Knodishall

And again Site 5 is on prime agricultural land and next to the villages of Knodishall, with landscapes that have not altered for over three hundred years.

9. Biodiversity

Biodiversity will be negatively impacted. This area is unusually rich in biodiversity, for example there are 876 species identified at the River Hundred which feeds into the RSPB North Warren.³

In December 2022 Suffolk Birding with Bins recorded sightings at RSPB North Warren of 102 Eurasian White-fronted Geese currently overwintering on this important feeding ground. Other sightings along the coast from Southwold to Aldeburgh were Waxwing, Caspian Gull, Jake Snipe, Pink Footed Geese, Purple Sandpiper, Little Auk, Black Redstart, Red-necked Grebe, Great Egret, Goosander to name a few.⁴

How National Grid can contemplate that Suffolk Coast and Heaths AONB is the right place to put an industrial energy hub beggars belief.

The M11 width cable trench routes will sever the wildlife corridors and cause unimaginable ecocide.

As Hank Paulson warned at COP15 taking place in December 2022 in Canada:

“If human society continues on this trajectory, we face a future where 30 to 50 percent of all species may be lost by the middle of the 21st Century.”⁵

The UK’s natural biodiversity is in a critical situation, more lost than almost anywhere else in western Europe, more than all other G7 nations and more than many other nations such as China. The UK is one of the world’s most nature-depleted countries, globally in the bottom 10% for biodiversity, only about half of it left, the global average is 75%.

Government priorities to improve biodiversity include a more integrated large-scale approach to conservation, putting people at the heart of biodiversity policy and reducing environmental pressures. NG must pay serious attention to those goals as its current plans will desecrate significant parts of coastal Suffolk, ignoring very tangible issues for local communities and creating intolerable environmental pressures.

³ 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](#) • [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](#)
- [Nightingale 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 Deadline5 Submission](#)
- [Broadleaved woodland and microtunneling, SEAS Deadline 3 Submission](#)
- [Habitats and Biodiversity, SEAS Deadline 2 Submission](#)

⁴ <https://suffolkbirding.webs.com/december-2022>

⁵ [Hank Paulson addresses CBN COP15, 13 December 2022](#)

10. 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 Snape, Aldeburgh, Thorpeness, Dunwich, Walberswick and Southwold for their short breaks and holidays if the main arterial roads (on which local communities are also dependent), already 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 or more years of continuous construction. This cumulative impact was not fully taken into account because the DMO was not made aware by National Grid of the extent of the plans. ⁶

There are no job benefits for this area, on the contrary there are significant job losses if these plans go ahead. This threat has been ignored and pushed aside by National Grid and other key stakeholders.

11. Community impact

Anxiety is the outcome of years of threats from these projects. Anxiety is known to lead to ill health and disease (source: Dr Jane McNeill SPR PINS Examinations and Professor Kervok Hopayian). These deeply rural communities have chosen to live here precisely because it is an oasis of tranquillity; it is not developed and these plans are the catalyst for mass industrialisation. If Friston is to be the major site other projects will be attracted here like a magnet. Job worries for younger people who are dependent on tourism and hospitality sectors, working for themselves or for small businesses and older generations who chose to retire here away from the pollution and noise of typically more industrialised urban areas.

⁷

12. Cumulative Impact

The cumulative impacts of Eurolink combined with Sizewell C, EA1N, EA2 and Sea Link will lead to considerable industrialisation of East Suffolk. The 'Leiston area' will become a

⁶ 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](#) by Cllr John Trapp
- [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](#)

⁷ SEAS TRAFFIC, HEALTH AND WELLBEING IMPACT SUBMISSIONS SUBMITTED INTO THE EXAMINATIONS OF EA1N AND EA2

- [Oral Presentation to ISH10 Health and Wellbeing by Dr Jane McNeill Deadline 8 – 25 March 2021](#)
- [Health Impact assessment by Prof. Hopavian, SEAS Deadline 5](#)

substantial complex of industrial scale infrastructure in the midst of unspoilt rural Suffolk. This is too great a burden for this compact area. ⁸

13. Security risks

Government and National Grid have failed to take into account that routing 30% of their electricity transmission through Friston is a National Security Risk. Whilst the destruction of agricultural land will impair food security.

14. It is obvious to anyone visiting this area that the adverse impacts will outweigh any benefits to this region. It is simply a catastrophe for the Suffolk Coast and Heaths and the people living within it, and on the scale of a National disaster. This is not hyperbole but how it will be viewed by future generations. There is no noble legacy in these outdated and self-serving plans.

NGV's exhibition, online webinar and questionnaire

15. Listening to NGV's informal presentations at the exhibition and at the online webinar there was a lot of conflicting information. Albeit knowledgeable about the project, this conflicting information clearly came from a lack of detailed knowledge or understanding of the context and geography of this area. It is believed that most NG representatives had never visited the area.

A number of times we were told that brownfield sites had been compared, yet how that was performed in an area where no brownfield sites exist (excepting a small part of Sizewell Beach) is a mystery to residents and community groups.

Many residents asked the question why NGV had not scoped Bradwell where NGENSO could upgrade its defunct power station and pylons. The riposte was Bradwell was too congested, there were constraints / boundaries that discounted that particular location.

When the same questions were asked at NGET's Sealink webinars we were referred to National Grid's geographic drawings of the current National Electricity Transmission System (NETS) 'Network Boundaries' in the South-East of England and pointed to the congestion of

multiple 'network boundaries' around the River Thames estuary and those close to Bradwell. From subsequent discussions at Sea Link Consultation drop in events, an understanding was that these were virtual constructs, 'boundaries' considered by National Grid ESO planning and network management. That they were not physical obstacles to additional offshore or onshore cabling to / from additional energy infrastructure. They do however

⁸ **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](#)

represent current energy transmission constraints within the network infrastructure as it is today, but from past history those boundaries have been revised from time to time. Therefore, it would appear these 'boundaries' could be revised further were Bradwell found to be a more suitable and preferable brownfield location as an Energy Hub for offshore wind connection and network reinforcement. National Grid need to prove concrete and comparable evidence that Bradwell is not a suitable site– see point 17.

Numerous alternative site options exist and should be seriously considered

16. 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 at the events, are not barriers given the scaling up of the UK's targets for wind energy to over 50GW by 2030 or more likely, 2032.

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.

16.1 Bradwell

It was clear that Bradwell has not been investigated in any way and SEAS does not hold with the explanation of 'energy boundaries' and believe this to be a quickly thought up ruse to bamboozle the layman with technology – see point 15.

The Rt Hon Dr Therese Coffey, our local MP, has consistently proposed Bradwell, 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, 6 May 2021 [[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.”

16.2. 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 Nautilus is now scoping WEST GRAIN. We know it is a busy area but the idea that it is already 'too congested' to consider Eurolink and other connections is unconvincing. The Port of London Authority could be more flexible given the energy security reasons.

17. With the new £100m grant scheme “[Offshore Coordination Support Scheme](#)” (OCSS) launched on 12.12.2022 and 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 Eurolink 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](#)

17.1 Eligibility criteria for the OCSS includes:

“At least one of the relevant Projects that forms part of the Application must not be included in the Holistic Network Design”.

This specific point is encouraging for East Anglia communities who had previously been unfairly excluded from having Holistic Network Design (HND) criteria applied to DCO applications in their area. At last, the possibility now arises for projects post consent to be reassessed using HND criteria if they are accepted as part of a new OCSS scheme. It is up to developers such as ScottishPower and NGV to seize this opportunity and present new plans using super hub brownfield sites closer to London and delivering greater offshore integration, instead of onshore co-location at coastal Suffolk which is a deviation. These developers are now being encouraged to draw subsea cable routes using the North Sea Corridor which is a more direct route from

wind farms to their end destination. This scheme could be the catalyst for holistic planning (taking into account socio-economic and environmental criteria) and resolve the current impasse.

National Grid: Take responsibility

18. 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.
19. 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 plc CEO, John Pettigrew and the same website, and communication is obviously taking place at a high level between NGESO and NGV.
20. 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. And on a brownfield site closer to London.

21. Conclusion

These project plans are reactive responses to criticisms of National Grid's tactical and piecemeal approach. These are totally unacceptable to SEAS and our supporters.

We propose the following:

- 21.1 A comparative study of brownfield sites (and an offshore grid) carried out by a neutral and independent team. This has been endorsed by our local MP Dr Therese Coffey and a petition has been issued.
- 21.2 HND criteria should be used for any future programmes and projects wherever they are in the UK. The model should be based on Denmark and Belgium examples.
- 21.3. NG ESO should become an independent organisation separated from the National Grid commercial businesses and joined together with BEIS in order to ensure long term planning and a holistic spatial strategy.

Suffolk Energy Action Solutions (SEAS)
Email: info@suffolkenergyactionsolutions.co.uk
18 December 2022