

This is **Suffolk Energy Action Solutions** (SEAS) formal response to Ofgem's consultation about a Nautilus update released on 15 July 2024, stating that National Grid Ventures' Nautilus Interconnector is intending to revise plans and connect at Friston after all. This will require construction of a dedicated substation at Friston and an associated converter station at Saxmundham. Our response also reiterates the concerns and objections we have made consistently to these plans.

SEAS is a community group representing thousands of communities along the Suffolk Coast and Heaths and in East Suffolk more generally.

Introduction

1. SEAS is writing to object to National Grid's ill-conceived plans to develop up to four converter stations at Saxmundham and three substations at Friston which will turn this rural landscape into an industrial energy mega-hub when there is an alternative better offshore solution using brownfield sites closer to demand.
2. If these plans go ahead, they represent a SEISMIC adverse impact on a beautiful landscape which is fragile and vulnerable already to erosion and flooding. It is extraordinary that Ofgem and National Grid can possibly contemplate dumping their huge concrete boxes in one of Britain's most loved places for ramblers, cyclists, ornithologists and artists.
3. A lack of strategic planning and a developer given too much freedom, whilst purporting to be acting in the interests of local communities, has brought this crisis about. It is a catastrophe in the making for individuals who chose to live here precisely because it is not an industrial zone.
4. These are not tiny substations but vast concrete converters towering over church steeples. Over 80 football pitches will be covered in concrete and steel. Night skies will be a thing of the past. Nightingales, otters, water voles and red deer amongst other wildlife will be displaced, for over 12 years, many will not survive their loss of sanctuary. The 10% mitigation biodiversity net gain mantra does not restore a rainforest equivalent, the Sandlings vital wetlands. The desecration of rare and precious countryside is a catastrophe in its own right and we haven't begun to discuss the human tragedy.

We appeal, we urge, we implore the Ministry for Net Zero, Ofgem and NG ESO to halt these needlessly destructive plans and to pivot to what Britain should be doing: using brownfield sites for mega hubs closer to London and pooling energy at offshore platforms in order to be more cost efficient, faster and to avoid congestion.

The role of Nautilus and the historic changes to the planning decisions for Nautilus

5. National Grid Ventures, a profit led company is developing plans for its Nautilus Multi-Purpose Interconnector Project that will allow electricity generated at offshore wind farms to be transmitted between the UK and Belgium. This project was originated in Belgium by Elia and National Grid is in a sense the passive recipient of this opportunity. This initiative is not part of a grand master plan for an offshore grid, it is pragmatic opportunism on the part of NGV who expect to profit from the export of energy from Britain in due course.
6. A non-statutory consultation was carried out in 2021 looking to identify a connection and conversion site in East Suffolk for this project, but it was then decided that the interconnector should be sited at West Grain.

This made good sense. West Grain was going to be a new Hub on the shoreline close to demand. The Isle of Grain Medway Hub was already getting congested and there was space further west to build a sister Hub. The two Hubs would complement one another.

7. Furthermore, Nautilus was going to be a pilot test project for pooling wind energy from North Falls and Five Estuaries in order to reduce onshore infrastructure and to make cost savings in the mid- term.
8. In March 2024 however, Ofgem determined that financial constraints meant that the West Grain site was deemed non-viable and on 15 July, Ofgem announced that Nautilus would be connected at the connection hub at Friston after all.
9. SEAS challenge National Grid's complete disrespect for the planning process and for basing all its project proposals on the false assumption that the connection hub at Friston is already established and under its own control. This is patently not the case. It was ScottishPower who applied for permission to use Friston and it was a proposal presented in isolation of all these other huge projects. The DCO Inspectors were very clear that if more evidence of more projects were to come to light, they would be minded to reject SPR's plans for EA1N and EA2.

SEAS challenges this false assumption.

10. SEAS also is making a formal complaint that the timing of this announcement and the way in which it has been announced was in a rush with minimum time for serious responses during the peak holiday period.
11. SEAS notes the fact that the Ofgem announcement was released during the summer holidays and in the middle of National Grid's Sea Link Project Update consultation meant that it passed almost unnoticed. These underhand tactics with a below-the-radar Nautilus project update announcement must be challenged.
12. Ofgem's costings are based on the assumption that everything will be connected at Friston, but the connection point is still only theoretical and planning consent for it was not sought by National Grid, but by Scottish Power for its wind farms. This is planning by the back door and National Grid's disingenuous inverted planning approach must be challenged.
13. Cost analysis that shows development of Nautilus at East Suffolk being cheaper than at West Grain is predicated on the assumption that the connection point at Friston already exists. This misleading approach to cost analysis that is based on false assumptions must be challenged.

Analysis of Ofgem / Arup's proposals and cost estimates:

14. General Comments:

- i) This is a poorly prepared and presented evaluation. It is written solely from the perspective of the immediate parties (Ofgem and NGV) and is therefore of minimal benefit or understandability to anyone who is not one of those two parties.
- ii) It appears that the whole analysis depends on a large number of implicit assumptions, which are neither listed nor stated and therefore cannot be tested, proved or disproved. That is sloppy and unacceptable in a matter of such national and strategic significance.
- iii) The paper lacks definitions of several jargon terms that are widely quoted throughout the paper.

- iv) It does not even include basic definitions of how some calculations have been done and some conclusions derived, and fails to provide key elements of the analysis performed by Arup.
- v) Given the very short timescale of this consultation and the materiality of what is being considered, this document is a sham and a consultation in title only.

Detailed Considerations

15. What is wholly inadequately explained is how a reduction in line capacity from GB to BE (from 3.5 GW to 1.4GW) can so materially improve the return to GB?

Why does the return improve so much, if the export capacity of line 2 is reduced - unless it is solely due to the projected reduced constraint costs for this project as a stand-alone project, ignoring the knock-on impact on numerous other offshore renewable projects (see para 6 below)

16. Furthermore, it is clear that this proposal provides absolutely no benefit whatsoever to the Great Grid Upgrade or improving GB's energy security/supply.

Figure 6 (markets modelling, which is "agnostic to interconnector location") shows explicitly that GB is expected to be a net energy exporter to BE until at least 2060/2070, i.e. for the foreseeable and predictable future.

So, this Nautilus proposal is solely about improving NGV's ability to export electricity to BE and earn significant revenue.

17. Figure 7 "SEW impacts" seems to show that the biggest gain from this proposal is to Producer Welfare, in an amount almost equal and opposite to the detriment of Consumer Welfare. How and why is that equitable?
18. It is suggested in this consultation paper, that Nautilus should be re-evaluated because by changing the location to Friston, the constraint costs suffered by Nautilus will be reduced by c. £1.5-2bn. But this is before taking account of the huge impact the suggested relocation has on a host of other projects (including NSIP projects) which collectively (based on Ofgem's data) would suffer a deterioration of constraint costs and thereby prejudice some or all of eight other individual projects listed in Table 4 of c.£1.6-1.8bn. In other words, there may be practically no overall material benefit to GB and there may possibly even be an overall deterioration to GB. Note: whatever benefit there may be, accrues only to NGV, not the British taxpayer or consumer.
19. Where is the adverse cost impact shown of the much longer subsea cable connection from Princess Elisabeth Island to Friston (as opposed to West Grain)?
20. If the case for Sea Link is valid (reinforcing the network by enabling excess supply to be taken from where it is being generated to where it is needed) then it is just as effective for Nautilus to terminate at West Grain or offshore from West Grain. As Nautilus is fundamentally an export interconnector, it does not need to terminate in Suffolk, but can export to BE from Kent.
21. To specifically answer OFGEM's question 2: "Do you think that Ofgem should be considering any other factors for the Nautilus project in the light of the material changes in connection location and capacity?"

This economic/financial analysis fails to place any significant weight on the **cumulative negative environmental, economic and social impacts** that will be specifically caused by locating Nautilus at Friston. The impact of all these interconnectors (LionLink, Sea

Link and Nautilus each being brought to onshore connections at Saxmundham and nearby Friston (as well as Sizewell C and other grid connections such as EA1N, EA2, LionLink, Galloper and Greater Gabbard) will **reduce the major source of local employment, namely tourism.**

On the other hand, keeping Nautilus at the existing brownfield site at West Grain would have minimal impact on any of those factors at that location.

22. Given, the Belgian termination of the Nautilus interconnector will be at an offshore energy island (Princess Elisabeth Island), why does NGV ignore the possibility of doing the same at the GB end?

Furthermore, TenneT (NGV's partner in the LionLink interconnector) says that the LionLink subsea interconnector cable will also terminate at an offshore converter platform in Dutch waters, before making landfall in Holland.

So, in the case of two planned NGV interconnectors with Continental Europe, at the other end, both those countries' grid operators will be terminating at an offshore platform, before bringing the energy onshore via an underground cable to brownfield sites.

Why cannot NGV be directed to do the same? Such an approach would enable faster grid connections for many of the current and future the East Anglia offshore windfarms to be realised, with a significant and immediate reduction in local opposition. Furthermore, such an approach could give the possibility of enhanced future connection options, rather than the current fixed onshore approach.

23. Finally, concentrating all these grid connections and interconnectors in one location makes GB strategically much more vulnerable to malevolent third-party state actors. This is not a trivial concern in the current international climate.

Summary

24. The document lacks transparency which invalidates the consultation as the analysis cannot be objectively critiqued.
25. Our review has revealed a number of flaws in the arguments for landfall in the Sizewell area as opposed to West Grain.
26. The cumulative impact of multiple energy projects concentrated in a small area of Suffolk adversely impacts the local economy, damages the environment and creates an unnecessary security risk. West Grain should be re-evaluated as the hub for a number of projects, taking a holistic view rather than a piecemeal approach.
27. The emphasis must remain on the benefit to all stakeholders, not just the commercial interests of one party.
28. Time spent now on a properly considered strategy will pay dividends during implementation, shortening the overall timescale. Whatever happens, it must be done at pace to prevent further delay to the overarching ambition towards Net Zero.

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29. All these adverse impacts could be avoided if an offshore grid with onshore conversion at brownfield sites closer to demand such as West Grain or Bradwell was developed instead.

30. Suffolk Coast and Heaths is the Wrong Place: The decision to site so much electrical infrastructure in this part of East Suffolk is fundamentally flawed. The decision is being driven by National Grid, a PLC motivated by generating profits for its mainly US and UAE based shareholders that is obligated to find sites for its projects that will be cheapest and easiest for it to develop whilst generating the quickest returns. Shoreline brownfield sites in need of generation that are closer to demand must be chosen instead.
31. Overwhelming Cumulative Impacts: National Grid is not being transparent with its planning process. Despite the overwhelming and engulfing cumulative impacts that will be caused by developing up to four converter stations at Saxmundham and three substations at Friston with their corresponding landfall sites and cable corridors, National Grid is considering all its projects in isolation. This problem will be further compounded by development of Sizewell C and the 800 new houses at the Saxmundham Garden Neighbourhood Site.
32. Serious Negative Impacts on Tourism and the Local Economy: The loss of income from tourism over 12 to 15 years of such intensive construction could amount to one billion pounds. There will also be totally unacceptable negative socio-economic effects with serious damage to the local economy and businesses. 15% tourism related jobs will be lost each year for 12 to 15 years of construction.
33. Flood Risk: There were already significant concerns regarding flood risk when development of the Scottish Power substation at Friston was the only electrical infrastructure project in the pipeline. Now that Nautilus, Sea Link and Lion Link have been added to the proposals, the area covered by up to four converter stations at Saxmundham and three substations at Friston will massively increase run-off in areas that are already at risk from flooding and this poses an alarming flood risk.
34. Traffic and Transport Issues: The staggering number of extra construction vehicles (1,200 extra HGVs daily for 12 years of construction and that does not include 700 in addition, for SZC). These extra HGVs and vans will be necessary in order to develop so much infrastructure and will cause frequent gridlocks, delays to emergency services and for local residents there will be reduced access to amenities. Visitors will go to more attractive places with easier access.
35. Mental health issues will erupt. Already there are tragic consequences of protracted and draining consultation processes in particular for affected parties. A “six-year nightmare” is how many people living on the front line of Friston and Saxmundham describe its effect. When you think about what they have to look forward to in the remaining years of their life, the hopes and dreams of a tranquil and happy community have been shattered. We have sought advice and guidance since 2019 from psychiatrists working on Grenfell Post Traumatic Stress and the concern here is that affected parties have been abandoned, left to be anxious and depressed without responses to their letters to a succession of Ministers and Ofgem and National Grid plc. They feel that their voices don't count. They are nobodies, the vulnerable and the ignored.

We have warned the Chair of National Grid plc in a face-to-face meeting of the gravity of the current situation. There is absolutely no excuse for this total lack of respect or understanding for what people are going through. This is not a nimby case that can be mocked.

Conclusions

The sheer scale of these projects is unprecedented and that is why we must halt this nonsense and start to use common sense and imagination to see the bigger picture.

36. We are formally registering our rejection of Ofgem's flawed rationale. It is yet another biased report where the assumptions can be torn apart very easily.

SEAS will continue to challenge these plans through the courts.

37. They are the wrong plans in the wrong places and it's time there was honesty about the fact that National Grid plc is only focused on its own shareholders' interests and British communities, ecology and local economies do not matter to them.

38. Ofgem's narrow remit highlighted in its analysis is contradictory to the new mission to use holistic design criteria to minimise societal and environmental adverse impacts.

Best wishes

Fiona Gilmore

On behalf of SEAS