



South Cottage, Chase's Lane, Friston, Saxmundham, IP17 1PJ

26 October 2021

National Grid Interconnector Holdings Ltd
1-3 The Strand
London
WC2N 5EH

By Email Only - info@nautilusinterconnector.com

For the attention of: Martin Moran

Dear Martin

NAUTILUS INTERCONNECTOR NON-STATUTORY CONSULTATION

This letter represents SASES' response to the non-statutory consultation and also as follow-up on a few specific matters discussed at our meeting on Friday, 1 October 2021.

As I believe you are aware SASES is a community group which was set up to challenge the onshore elements of the multiplicity of offshore projects which are planned to, or which are likely to, connect at Friston. We also support Friston Parish Council in challenging these projects and the views of SASES in this letter can be assumed to be those of Friston Parish Council.

SASES strongly supports offshore energy development but deplores the chaotic and environmentally damaging approach which has been taken to the onshore infrastructure needed to support offshore energy development.

SASES regards this consultation as premature as it is based on the assumption that the National Grid NSIP at Friston and the associated Scottish Power NSIPs for EA1N and EA2 (together the "Scottish Power NSIPs") are consented. Those decisions have yet to be made. Furthermore the applications for these projects are flawed not least as there was a failure to carry out a cumulative impact assessment of the Scottish Power NSIPs given that the National Grid NSIP will be a connection hub for a number of offshore projects including Nautilus and Eurolink.

Further your consultation, which is premature and may prove to be pointless if the Scottish Power NSIPs are refused consent, has placed yet another burden on the community which has had to deal with extensive consultations for the National Grid and Scottish Power NSIPs plus that for Sizewell C. This is simply intolerable. This non-statutory consultation is all about National Grid Venture's corporate timetable and shows little regard for the community. The community is weary of developer consultations as its experience is that they are "tick box exercises" where its views will be ignored.

You can assume that NGVs proposals for Nautilus and Eurolink are strongly opposed by SASES and will be vigorously challenged.

Meeting of 1 October 2021

We would like to thank you and your colleagues for making the time available to discuss these projects. There are three specific points which we would like to follow up as follows.

1. We discussed the criteria and the process which NGV will use to select the converter station site, cable route and landfall. The process used by Scottish Power and National Grid to select the Friston site was deeply flawed and SASES made detailed submissions on this point during the Scottish Power examinations. At our meeting we requested details of all the criteria that will be used by NGV as well as the process which would be adopted. A particular concern is whether the suitability of the site for the Eurolink converter station would be assessed as part of the site selection for the Nautilus converter station i.e. the site would be selected on the basis of colocation of the Nautilus and Eurolink converter stations. At the meeting you would not commit to providing this information despite it being fundamental to a meaningful consultation. You did indicate that you might consider this request further. Have you been able to do so?
2. We also requested details of how NGV would conduct its consultation process ahead of submitting its application to the Planning Inspectorate and in particular at what point in the consultation process would NGV decide upon its preferred site, cable route and landfall. You were unable to provide clarity on this point. Are you able to do so now and if not when will you provide such clarity?
3. Can you please advise as to whether the Nautilus and Eurolink Interconnectors will provide any permanent jobs (i.e. not construction jobs) for the local community and if so how many.

Consultation feedback form

We have provided comments on the questions set out in this form. The answers to questions 1 and 2 are provided above.

Fundamentally this form is a crude and simplistic exercise given the complex issues and context which underlie the questions. It is unclear as to how NGV will use the results of this consultation. Extreme caution needs to be taken in drawing conclusions from the responses to these questions.

Q3 – Climate change is an issue which should be addressed – strongly agree

Q4 – The UK needs to generate more energy from renewable sources – strongly agree

Q5 – Greater cooperation between energy developers is important in limiting the impacts of renewable energy generation

This statement/question is incomplete as it does not include National Grid in its NGET and NGESO guise. National Grid has a pivotal role in such cooperation and furthermore such cooperation requires long-term planning and investment which National Grid has failed to do for over a decade.

Q6 – Greater coordination between energy developers is more important than achieving the UK's renewable energy targets.

This statement/question is flawed as it is putting two issues into opposition which are not necessarily in opposition. Again it does not mention National Grid. In reality greater coordination between energy developers and National Grid is essential to the UK achieving its renewable energy targets.

Q7 – In your view, how could developers be better coordinated and what are your expectations from them?

Again this question fails to mention National Grid. As you are well aware the answer to this question is complex. The Offshore Transmission Network Review is trying to address this complex question. Furthermore the underlying issues go beyond just coordination and include minimising environmental damage. In terms of a simplistic answer National Grid and developers should not continue as they have they to date with a combination of poor strategic planning, lack of investment, incompetence and disregard for the environment and people, namely in facilitating/developing individual point to point radial connections. Instead windfarms/interconnectors offshore it should be connected offshore in a manner which (i) reduces substantially the number of landfalls and cable routes (ii) avoids landfalls and cable routes in sensitive coastal areas (iii) avoids substation/convertor stations being built on rural greenfield sites with multiple adverse environmental impacts and causing severe disruption to rural communities.

Q8 – Based on your understanding of the concept, how supportive are you of the use of MPIs? This question is about the principle of MPIs rather than Nautilus as a project.

The principle of MPIs should be continued to be explored if it offers the opportunity for greater coordination and efficiency, and will substantially reduce environmental impacts both offshore and onshore. Furthermore the economic benefits of MPIs need to be better explained not least in terms of how the benefits will be shared with the consumer.

Q9 – Based on your understanding of the criteria we have used for our onshore siting and routeing work, as summarised on our two “Nautilus onshore” exhibition boards, do you think there are any additional criteria and evidence which we should consider?

Please see comments above on site selection criteria and process.

Q10 – Do you have any further comments on the approach taken to identify our converter station search areas etc?

Please see comments above on site selection criteria and process

Q11 – Do you think that it would be beneficial to collocate developments to form clusters within the AONB?

This is an extremely sensitive subject within the community and you may be aware of the Phase 3A consultation which was conducted by Scottish Power. The only comment SASES would make, should the National Grid and Scottish Power NSIPs be consented, is that the chosen converter station site and cable route should be those which have the least impact both during construction and operation on the village of Friston and its immediate surrounding area.

Q12 – do you think that consideration should be given to locating developments in areas of the AONB which are already characterised by industrial development?

See comment on Q11 above

Q13 – Based on your understanding of the criteria on our three “Nautilus offshore” exhibition boards which we have used to search for and identify our landfall options do you think there are any additional criteria and evidence we should consider?

Please see comments above on site selection criteria and process. We would also recommend that you fully familiarise yourself with the submissions made on these issues during the Scottish Power examinations if you have not already done so.

Q14 – Do you have any comments on the approach taken to identify offshore area of search and the identification of landfall options?

Please see comments above on site selection criteria and process. We would also recommend you fully familiarise yourself with the submissions made on these issues during the Scottish Power examinations if you have not already done so.

Q15 – do you have any further comments on our proposals for Nautilus?

See comments above. Generally we reserve our right to make further comments when the decisions on the grant of the DCOs for the National Grid and Scottish Power NSIPs are finally determined.

Q 16, 17, 18 – we make no further comment except as set out above in that we regard this consultation as premature.

I look forward to hearing from you on the matters arising from our meeting as referred to above.

Yours sincerely

Michael Mahony

cc Rt Hon Therese Coffey MP

Richard Rout - Deputy Leader Suffolk County Council

Andrew Reid - Councillor Suffolk County Council

Craig Rivett - Deputy Leader East Suffolk Council

Russ Rainger - Councillor East Suffolk Council