From: David Holland stourvalleyunderground@gmail.com & Subject: The need for a new electricity grid regulatory framework

Date: 11 January 2021 at 11:06To: james.cleverly.mp@parliament.uk



To the Rt Hon. James Cleverly MP, Member for Braintree Constituency.

From David Holland and Richard Barnes, Leaders of the amenity group, Stour Valley Underground NB We are both residents of Braintree Constituency at CO10 7NA

Dear James.

# The threat to the landscape of your constituency from new electricity infrastructure:

## The need for a new electricity grid regulatory framework

## Why are we writing to you?

We write to seek your support in addressing a threat to the landscape of your constituency from the energy industry and its developing infrastructure. However, the issues we address are of considerable national significance.

## **Key points:**

- 1. The scale of the threat is in large part a consequence of inadequate energy infrastructure regulatory policy.
- 2. A policy driven co ordinated grid development approach is required to best deliver the benefits and opportunities inherent in the Saudi Arabia of Wind vision.
- 3. As well as local, the objectives for which we seek your support therefore include the significant national ones listed below

A co ordinated approach as a result of an appropriately redeveloped regulatory framework would facilitate delivery of :-

- affordable energy for the nation
- a carbon neutral UK by 2050
- · this region becoming the Saudi Arabia of Wind
- and thus the UK becoming a significant energy exporter
- mitigate the intermittency of renewable energy generation
- mitigate stability issues on the Grid that are a consequence of the connection of renewables
- reduce the overall cost of connecting the wind farms by £billions
- reduce the need for vastly increased onshore infrastructure
- greatly reduce the amenity and environmental impact of new onshore infrastructure

All of these points are of the greatest importance and the last one of particular significance to your rurally located constituents.

A key part of delivering to these objectives is the development of undersea grids to link the windfarms and connect them to shore and to the international interconnectors.

To achieve all of this, a new regulatory framework is needed to drive the co ordinated development of onshore and offshore electricity grids.

Suffolk MPs are already campaigning for an urgent review of energy infrastructure regulation to deliver this coordination and they are pressing for a commitment to such to be included in the forthcoming Queens Speech. We urge you to collaborate with your colleagues in the House including South Suffolk MP, James Cartiledge in this endeavour.

#### **Our Case**

What follows is our case for your support and action on this issue. It encompasses both:-

the national case wherein the best interests of the whole nation in terms of all of the bullet points above

and

the local case in support of the interests of your constituents in not despoiling the landscapes they love,

#### The National Context

The eastern region and in particular, the seas that border it are destined to become the "Saudi Arabia of Wind". Andrea Leadsom when Business Secretary told us that Government expect green energy to account for a larger proportion of the UK economy than finance in a decade's time. Currently, windfarms are connected to the grid in an ad hoc fashion that leads to much despoilment of the coastal and eastern region countryside.

The alternative is connections including windfarms and import / export interconnectors via an undersea grid. This would facilitate delivery of the energy to established eastern UK landing points such as Grain and Bradwell. Such a coordinated approach is said by the industry to have the potential to yield a saving in connection costs of appx. £6Billion. And yet, the current regulatory framework will neither drive a coordinated solution of this form, nor will it facilitate either this fiscal saving, nor can it save the eastern region countryside and environment from despoilment.

Further, a coordinated connection strategy would encompass the interconnections that link the UK electricity grid to the European mainland and facilitate the huge potential for energy export and for mitigation of the intermittent nature of renewable energy generation. This means that the coordination we advocate is of the greatest importance to delivering huge economic benefit to our nation and also in ensuring security of supply.

#### The Local Context

Failure to embrace the opportunity to deliver a coordinated electricity grid consequent of an inadequate regulatory framework will lead to the need for far more onshore transmission capacity. This means yet more pylons and substations in the countryside, more woodland cut through in swathes to accommodate the power lines between the pylons, and also more grid scale solar farms on best and most versatile farmland and in locations that compromise the wellbeing benefits of the natural landscape and its cultural heritage assets.

Within your constituency we are pressing NG to underground their proposed new connection from Bramford to Twinstead (B2T). But there are further threats to the landscape of your constituency consequent of this project. Our calculations based on NG data shows that the current project will not future proof the Grid in this area and that NG will need further transmission capacity increases here. That could mean yet more pylons in high value landscapes. A coordinated onshore / offshore grid has the potential to avert this by transmitting much of the energy that needs to come to the UK undersea to the centres of greatest use such as London and the south east.

NG's B2T project includes a proposal for a new substation at Twinstead in your constituency. NG, as part of their B2T project propose to remove an existing 132kV line of UKPN ownership and replace it with a fat taller 400kV National Grid connection. the substation would functionally replace the removed 132kV line. However, this objective can be achieved by an underground cable linking Braintree Substation to Rushley Green at what we contend to be comparable cost. This solution is of itself a more environmentally and amenity preferable one. However, a substation would bring another threat to the countryside and thus the underground solution becomes even more preferable to your constituents.

In the eastern region, the UK Power Networks (UKPN) owned electricity distribution grid is saturated with energy to the extent that no large scale solar can be connected to it. This means that the only sites that can host grid scale solar are near NG substations. This can be seen in the proposals for south Suffolk near NG's Bramford Substation. In north Essex, the Longfield Solarfarm proposal near Hatfield Peverel (See attachments) is an example of the vast tracts of countryside that can disappear beneath amenity damaging black silicone panels.

So large scale solar developments now have to be connected direct to the National Grid. A substation at Twinstead would bring the threat of large scale solar proposals to the high plateau landscapes of the north of your constituency. As we have also said, there is no local need case for the energy this would generate as at both local distribution grid level, and and national transmission grid level, the region has more electricity to transmit than it can possibly use. Indeed the B2T project is all about "getting the energy away" from this region.

So there are a number of threats to the countryside of your constituency linked to the issues outlined above and your constituents are highly engaged in combating threats to the countryside they love.

#### SVU: Who are we?

We write as your constituents and as the leaders of Sour Valley Underground (SVU), an amenity group with over ten years of experience in addressing the threat to the countryside of north Essex from the energy industry. SVU have engaged positively in this endeavour at all levels from the Energy Secretary of State to local village hall meetings with residents. We have based our campaign on research and public information initiatives. SVU have avoided all traditional banner waving and demonstration, preferring to address these issues by coming forward with solutions that are at one and the same time, better, affordable and deliverable. We include a briefing note on our history.

SVU campaign on this issue alongside the Colne Stour Countryside Association, The Dedham Vale AONB Society and a number of other groups addressing these issues in Suffolk. Together we have an umbrella organisation called the Essex and Suffolk Amenity Group Coalition which facilitates collaboration and knowledge sharing. The coalition have recently met with your colleague James Cartlidge to discuss the issues raised in this email. We have also recently met with ECC's Principle Planning Officer to apprise one another of matters relating to the issues covered above and have plans for ongoing liaison.

## Why do we campaign?

We love the unspoilt rural landscapes of this area and cherish it for its beauty, wellbeing, environmental and many other benefits. That in great part is why we choose to live here. Through extensive research, we know that embracing this nation's energy future does not necessitate spoiling these valuable assets and we identify and advocate solutions to deliver this.

The north of your constituency is host to many significant environmental and cultural heritage assets. SVU have identified such and have precipitated national press coverage for these nationally significant assets. The sheer number of environmental, amenity and cultural assets in this part of your constituency is evidenced by the fact that during the A120 consultation, events for which you attended, no sensible, non serpentine, more northerly route could be found for the new section of the road because of the constraints these many assets imposed.

A significant threat to this landscape comes from National Grid's Bramford to Twinstead Connection Project which we have been addressing since 2009. This project would see yet more pylons erected in the high value landscapes of the Essex / Suffolk border. SVU have successfully argued for an underground connection in the Stour Valley but we have yet to have confirmation that this will in fact be implemented.

The project which was put on hold in 2013 but since 2019, has been moved to "Progress" by NG. The need therefore remains to campaign to press for the right balance in decision making to deliver an energy future that does not despoil our countryside. This future is deliverable if only we as a nation manage the process appropriately. That requires an effective and appropriate government regulatory framework to steer the right development outcomes for all concerned.

## Our requests to you:

We, on behalf of very many of your constituents ask you to apprise yourself of the National Grid Bramford to Twinstead Project and support us in our work to secure the deliverable and environmentally preferable underground connections we advocate.

We ask you to support us in opposing the siting of a new substation in Twinstead in your constituency because of the detriment to amenity it would itself deliver, and also because of the hugely unwelcome and unnecessary threat it would bring for large scale solar farms to blight our open landscapes.

And lastly and of most immediate importance, we ask you to support your colleagues call for a new regulatory framework to be urgently developed to steer the development of a coordinated onshore / offshore electricity grid that can both reduce the disfigurement of the countryside with energy infrastructure. This whilst at the same time, saving the nation £billions and facilitating the growth of the UK as a major energy exporting economy.

The document "Joint MP response to National Grid ESO (NGESO) Offshore Coordination Project consultation Autumn 2020" is available from James Cartlidge's website <a href="here">here</a> and explains the MPs and our common objectives on this issue

Most urgently, we are asking you to support the call for the development and implementation of a new regulatory framework for onshore / offshore electricity grids to be included in the forthcoming Queens Speech.

With thanks and best wishes,

David Holland Richard Barnes Leaders of Stour Valley Underground

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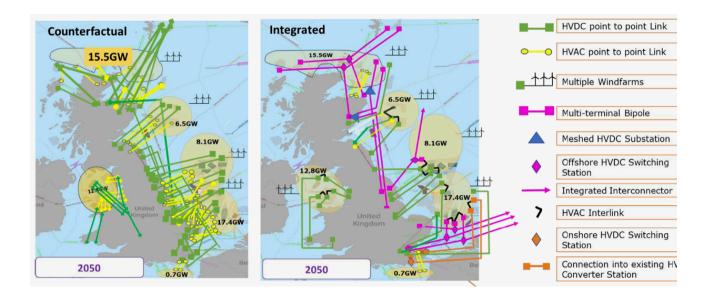
### Appendices:

A Brief History of Stour Valley Underground (PDF)

An Example map of current large scale solar proposal in north Essex to illustrate the magnitude of this potential threat to the countryside. (Further details on request)

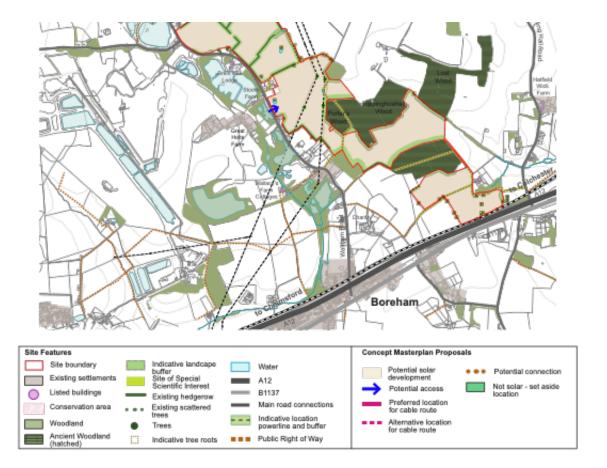
A map from "Holistic Approach to Offshore Transmission Planning in Great Britain" indicating just how much of a difference a coordinated or "integrated" approach to windfarm connection can be made through a coordinated undersea approach. (full document available on request)

From this it is clear that far fewer landfalls with the attendant environmental damage results from the coordinated or "integrated" approach. However, this cannot be delivered without regulatory reform.



## Site Features and Concept Masterplan







A Brief History of Stou...nd.pdf