

**From:** [Graham Gunby](#)  
**To:** [East Anglia ONE North](#)  
**Cc:** [Richard Rout](#); [Sue Roper](#); [Mark Ash](#); [Andrew Reid](#); [Russ Rainger](#); [Naomi Goold](#)  
**Subject:** NSIP SPR EA1N Adequacy of Consultation  
**Date:** 08 November 2019 11:57:47  
**Attachments:** [SCC ESC EA1N Adequacy of Consultation Response to PINS - 08.11.2019.pdf](#)  
[Appendix 1 - Joint report by SASES and Friston Parish Council - EA1N & EA2 \(1\).pdf](#)

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Dear Sian

Further to your letter of the 25 October please find attached a joint response from Suffolk County Council and East Suffolk Council.

Regards

**Graham Gunby**

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**Your ref:** EN10077

**Our ref:**

**Date:** 8 November 2019

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Dear Sian,

**Planning Act 2008 (as amended) – Section 55 - Application by ScottishPower Renewables (UK) Limited for an Order Granting Development Consent for the East Anglia One North Offshore Windfarm – Adequacy of consultation request**

Thank you for the notification that ScottishPower Renewables (SPR) has submitted the East Anglia One North windfarm application for Development Consent. It is understood that the Planning Inspectorate has until 22 November 2019 to determine whether to accept the application. During this time local authorities have until 8 November 2019 to submit a representation regarding the pre-application consultation. Please therefore accept this letter as a joint response from Suffolk County Council and East Suffolk Council (referred to as 'the Councils') to the Planning Inspectorate's request for comments on the adequacy of consultation undertaken by the applicant during the pre-application stage. The letter dated 25 October 2019 sets out that the Councils should consider whether the applicant has complied with the following duties:

- Duty to Consult – Section 42 - Planning Act 2008 (as amended)
- Duty to consult the local community – Section 47 of Planning Act (as amended)
- Duty to Publicise – Section 48 of the Planning Act (as amended)

When writing the Councils response, we have referred to the Consultation Report produced by the applicant. It should be noted that SPR has also submitted an application for a second project, East Anglia Two which the Councils will be responding to separately.

**Pre-application Consultation**

SPR has undertaken five rounds of consultation simultaneously in relation to both East Anglia One North and East Anglia Two projects which has caused some confusion to the local community. The pre-application consultation undertaken has been detailed below:

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Phase 1 Consultation – October/November 2017 – informal consultation

- Public Information Days (PIDs) held in Southwold, Leiston, Lowestoft and Orford late October/early November 2017.

SPR has stated that Phase 1 was an informal round of consultation prior to the subsequent formal rounds of consultation. The information available at this stage was limited.

Phase 2 Consultation – 17<sup>th</sup> March (Date of 1<sup>st</sup> PID) - 17<sup>th</sup> April 2018

- PIDs held in Lowestoft, Southwold, Leiston, Thorpeness, Aldeburgh and Orford March 2018.

The information provided at Phase 2 was only slightly more than that provided at Phase 1. The exhibition boards at the PIDs provided a brief outline of the projects supported by an onshore site selection zone map and illustrative offshore visualisations. No detailed ecological, landscape, archaeological heritage or other constraints assessment of the different sites was provided which limited the Councils' ability to comment fully on the suitability of any of the sites. No information was provided in relation to the cumulative impacts of the projects. The Councils stressed the need at this early stage to consider the potential new nuclear power station (Sizewell C) at Sizewell and the interconnector projects proposed by National Grid Ventures (Nautilus and Eurolink) in addition to any other relevant projects.

The Councils found the absence of printed information available to those visiting the PIDs to take away disappointing given this was the first round of formal consultation. It was also considered that the formal nature of the consultation could have been made clearer on the feedback forms provided. It was noted by the Councils that of the ten questions on the feedback form, only three related to the impacts of the schemes and of those, two were phrased in a leading manner, the rest related to the process of consultation. There was also a concern that those not attending the PIDs may not have readily found information relating to the projects or known where to reply.

Friston Parish Council has raised concerns that they were not consulted as part of Phase 1 and were not adequately informed of the Phase 2 consultation. The Consultation Report identifies that flyers were provided to Knodishall and Aldringham Parish Councils but not Friston Parish Council. No PIDs were held in the village of Friston or Knodishall. This resulted in few residents from this local area attending the PIDs.

Phase 3 Consultation – 16<sup>th</sup> May - 28<sup>th</sup> August 2018

- PIDs held in Lowestoft, Southwold, Leiston, Thorpeness, Aldeburgh, Friston and Orford late June/early July 2018.

Phase 3 was the first consultation which included a PID in the village of Friston although this was after SPR had already made their site selection decision. This decision appeared to be made despite a lack of detailed examination of the impacts of the different sites in terms of both construction and operation. The information provided during the consultation built slightly upon the previous consultation phase but remained limited in terms of its detail and no further information was provided regarding cumulative impacts of the projects. The lack of detailed information on issues such as transport, ecology, noise, landscape, historic environment etc. restricted the Councils ability to make informed judgements and recommendations on the proposals.

The Councils also again found the absence of printed information for attendees of the PIDs to take away and digest disappointing.

#### Phase 3.5 Consultation – 29<sup>th</sup> September to 12<sup>th</sup> November 2018

- Public meetings held in Leiston, Friston, Knodishall and Thorpeness October 2018

This phase of consultation was introduced as a result of the Councils continued requests for the onshore site selection area to be widened to include land at Broom Covert, Sizewell owned by EDF Energy. SPR held four public meetings and published documentation in relation to the two site options including photomontages. The Councils again made it clear in their response to this consultation that the lack of detailed landscape, ecological, archaeological, heritage, transport, flood risk, noise, air quality, ground contamination or socio-economic assessments being provided limited their ability to comment fully on the suitability of any site. The Councils requested that at the very least a full Landscape and Visual Impact Assessment (LVIA) be undertaken in relation to both sites prior to the final site selection decision being taken, in addition to further work being undertaken regarding a pinch point on the cable route and National Grid connection infrastructure. The final site selection decision was made by the applicant without adherence to these requests.

#### Phase 4 Consultation – 11<sup>th</sup> February to 26<sup>th</sup> March 2019

- Public Information Days held in Friston, Aldeburgh, Leiston, Orford, Knodishall, Thorpeness and Southwold February/March 2019.

SPR provided notification that the Phase 4 consultation comprised the statutory s42 pre-application consultation and included preliminary environmental information. This resulted in a significant amount of additional technical information being published at this stage. The volume of technical information available in combination with the relatively short timeframe provided for comments, albeit the timeframe exceeded the required 28 days, presented the Councils and especially local communities with difficulties. Prior to the Phase 4 consultation the information provided by the applicant was limited. The information provided with Phase 4 allowed the Councils to provide more

detailed comments on the projects and its impacts although details on the cumulative impacts of the projects with other projects remained insufficient.

This letter will now address whether the pre-application consultation undertaken by the applicant in relation to the project has complied with the statutory requirements set out within sections 42, 47 and 48 of the Planning Act 2008. Each section of the Act will be addressed separately for clarity.

### **Duty to Consult – Section 42 - Planning Act 2008**

*The applicant must consult the following about the proposed application –*

- 1. Such persons as may be prescribed,*
- 2. Each local authority that is written in section 43,*
- 3. The Greater London Authority if the land is in Greater London, and*
- 4. Each person who is within one or more of the categories set out in section 44.*

Subsection a) refers to ‘such persons as may be prescribed’. These persons are listed in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. A list of those consulted during Phase 4 has been provided in Appendix 9.1 of the Consultation Report and appears to comply with those of relevance listed in Schedule 1.

A requirement to consult the relevant parish council is included within Schedule 1. Although it is acknowledged that the relevant parish councils were consulted on the project during the later rounds of consultation, it should be noted that Friston Parish Council were not notified about the first phase of consultation undertaken in 2017 and received inadequate notification of the second phase.

SPR has provided a list of the local authorities consulted on the project. This list includes East Suffolk Council and Suffolk County Council alongside a few other neighbouring local authorities. The Councils can confirm they were engaged by the applicant on all the consultation phases, the applicant has therefore complied with subsection b).

There is no requirement to consult the Greater London Authority as the order limits of East Anglia One North do not fall within Great London, therefore subsection c) is not engaged.

Subsection d) of section 42 requires SPR to consult each person who is within one or more categories set out in section 44. This would include owners, lessees, tenants or occupiers of land included within the boundary of the order limits or those with an interest in the land or with a power to sell or convey the land. A list of landowner and statutory undertaker consultation has been provided in Appendix 10 of the Consultation Report. A table has been provided which details the landowners

consulted by reference to their landowner number, it is not possible from this information to see if every person set out in section 44 has been consulted and therefore no comments are provided on this point.

Section 45 of the Act 'timetable for consultation under section 42' requires that the applicant notifies the consultee of the deadline for receipt of comments in relation to the consultation which must not be earlier than 28 days after the consultation documents are received. The Councils can confirm that the requirements of section 45 of the Act have been met.

### **Duty to consult the local community – Section 47 of Planning Act**

1. *The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.*
2. *Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.*
3. *The deadline for the receipt by the applicant of a local authority's response to consultation under subsection (2) is the end of the period of 28 days that's begins with the day after the day on which the local authority receives the consultation documents.*
4. *In subsection (3) "the consultation documents" means the documents supplied to the local authority by the applicant for the purpose of consulting the local authority under subsection (2).*
5. *In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).*
6. *Once the applicant has prepared the statement, the applicant must publish it–*
  1. *In a newspaper circulating in the vicinity of the land, and*
  2. *In such other manner as may be prescribed.*
7. *The applicant must carry out consultation in accordance with the proposals set out in the statement.*

In accordance with subsection (1) SPR prepared a Statement of Community Consultation (SoCC) which set out how they proposed to consult with 'people living in the vicinity of the land'. The SoCC has been provided in Appendix 3 of the Consultation Report.

SPR consulted the Councils on the draft SoCC on 21 December 2017 with joint comments being provided before the deadline of 26 January 2018. The Councils made several comments which were addressed prior to the publication of the SoCC on 6 March 2018. It should be noted that comments were made by the Councils in their formal response regarding the labelling of the engagement events as 'Public Information Days'. There was concern that this would cause confusion, with people

believing that the events were only designed to provide information rather than a means to consult and receive feedback. SPR however continued to brand the events as PIDs.

Following requests from the Councils for SPR to widen the project's onshore search area to include land at Broom Covert, Sizewell, SPR introduced a further round of consultation (Phase 3.5) which required revision to the SoCC. SPR consulted the Councils on the draft revised SoCC on 10 August 2018 with a deadline for comments of 8 September 2018. The Councils provided comments within the consultation period. The points made within the response were primarily addressed by SPR except for the comments regarding the name given to the engagement events.

By preparing a SoCC and consulting the relevant local authorities with the 'consultation documents' SPR has complied with subsections (1), (2), (3) and (4) of section 47. The Councils are also satisfied that SPR generally complied with subsection (5) with comments raised regarding the SoCC being given due 'regard' as required.

SPR has provided evidence to show the SoCC and revised SoCC were published in the following newspapers on two consecutive weeks in March 2018 and September 2018 respectively:

- Eastern Daily Press,
- East Anglian Daily Times,
- Fishing News.

The Councils are satisfied these newspapers 'circulate in the vicinity of the land' as required by subsection (6)(a). Subsection (6)(b) also requires the SoCC to be published 'in any other manner as may be prescribed'. It was detailed within the SoCC and revised SoCC that the statement would also be available to view at several other locations between specified dates. The list of locations unfortunately did not include Knodishall but did include Friston Parish Council. The Councils have however been advised by the Parish Council and action group, Substation Action Save East Suffolk (SASES) that a copy of the original SoCC was not deposited at Friston Parish Council.

Subsection (7) requires SPR to undertake the consultation in accordance with the details set out in the statement. The Councils are satisfied that SPR has carried out the consultation in accordance with the SoCC.

#### **Duty to Publicise – Section 48 of the Planning Act**

1. *The applicant must publicise the proposed application in the prescribed manner.*
2. *Regulations made for the purposes of subsection (1) must, in particular, make provision for publicity under subsection (1) to include a deadline for receipt by the applicant of responses to publicity.*

Part 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 sets out how to 'publicise the proposed application in the prescribed manner' in order to comply with subsection (1). Appendix 9.4 of the Consultation Report provides copies of the section 48 notices which were published within the following sources:

- East Anglian Daily Times
- The Times
- London Gazette
- Lloyd's List
- Fishing News

The publication of the proposed application as set out in the Consultation Report complies with subsection (1). The other phases of the consultation were also published in local newspapers.

The press notice published provided a deadline for the receipt of responses to the consultation and therefore complied with subsection (2) of section 48. The information was made available from 11 February and a deadline of 26 March 2019 provided. This timeframe exceeded the requirement set out in the 2009 Regulations of 'not less than 28 days' but the local communities and stakeholders did find digesting the significant volumes of information provided during the consultation and drafting a detailed response within the timeframe challenging.

### **Adequacy of Consultation Representations Received from Local Community**

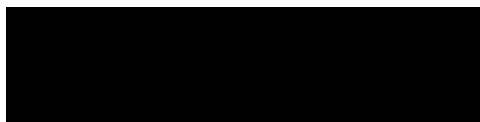
Friston Parish Council and SASES action group have written a joint response setting out their concerns in relation to the consultation undertaken by the applicant. Although this report details the Councils' views on whether SPR has met all the statutory requirements set out in sections 42, 47 and 48 of the Planning Act 2008, a copy of the representation received from these parties has been provided in Appendix 1 of this document for the Planning Inspectorate's information. This sets out the views of the local community on the adequacy of the consultation.

### **Conclusion**

It is understood that it is for the Planning Inspectorate to determine whether the applicant has complied with the requirements of the Planning Act 2008 in order to accept the application. It is the Councils' view that the SPR has complied with the statutory requirements set out in sections 42, 27 and 48 of the Planning Act 2008 for the reasons set out within this report albeit the Councils have detailed some concerns regarding the consultation undertaken.



Yours sincerely,



**Stephen Baker | Chief Executive**  
East Suffolk Council



**Sue Roper | Assistant Director**  
**Strategic Development**  
**Growth, Highways & Infrastructure**  
Suffolk County Council

Appendix 1 – Friston Parish Council and SASES report on adequacy of consultation



on behalf of Friston Parish Council

## **A report by SASES on the Adequacy of Scottish Power Renewables' Consultation with the Community at Friston (and other villages nearby) with regard to SPR's EA1N and EA2 Wind Farm Projects**

### **Introduction**

**Substation Action|Save East Suffolk** (SASES) is a group working under the auspices of Friston Parish Council (FPC) in response to the burden of work placed on it by SPR's proposals for EA1N and EA2 to be located in the vicinity. SASES' position is fully supported and authorised by FPC and SASES also has the support of the Parish Council of Aldringham-cum-Thorpe,

### **Summary**

This document will set out the inadequacies of SPR's engagement with the public, and in particular its consultation with the residents of the local communities likely to be affected by the projects, and Friston Parish Council in particular. Evidence of the failures in the Consultation are set out chronologically in the body of this report and further substantiated by information provided in the Annexed documents.

In summary SPR has failed to meet the required standards of Consultation under Section 47 of the Planning Act 2008 or to follow its "Guidance on pre-Application Consultation". Major failings include, but are not limited to, the following:-

1. SPR has failed completely and deliberately to inform Friston Parish Council (FPC) and residents of Friston of the Phase 1 of the Consultation Plan.
2. SPR failed to properly inform FPC and residents of the Phase 2 Consultation.
3. SPR placed advertisements in newspapers, which were unlikely to be read by those in the Onshore Study Area. SPR also failed to supply publicity material, including posters, to Friston or FPC.
4. Early emails from scottishpower.com were frequently blocked by spam and virus filters and no attempt was made by SPR to check receipt of important communications. Proper contact with the potentially affected Parish Councils was not therefore established at an early stage.
5. SPR failed to supply FPC with a copy of its Statement of Community Consultation (SoCC) on publication on 6<sup>th</sup> March 2018. Residents therefore

were not informed of its existence or able to view or comment on the document.

6. SPR chose to consult the public on the SoCC during Phase 2 asking for a response by 3 April 2018. This is contrary to the requirement to have the final SoCC in place before the first Statutory Consultation (i.e. Phase 2 commencing 6 March 2018)).
7. Very few residents of Friston had been informed of the dates of the Phase 2 PIDs therefore there were few Friston residents who attended these. Most residents had only two weeks to make representations and responded without the benefit of seeing the information displayed at the PIDs or having any printed literature.
8. SPR failed to respond to letters and emails from the public in a full and timely manner. In one example only a partial reply was given by SPR after 48 days.
9. SPR refused, in spite of requests from the communities, to release documents and essential information needed to properly inform consultees about SPR's own assessment of the options on which it was purportedly seeking residents' views. Other documents have been deliberately withheld in the Consultations.
10. The Red/Amber/Green (RAG) Substation Site Assessment Reports were deeply flawed and withheld from publication for between six and eighteen months of production.
11. SPR failed to offer genuine alternative routes from the Coast to its preferred substation site for the onshore cable corridor.
12. SPR's Feedback Forms asked leading questions causing significant bias at Phase 2 Consultation on which the decision to come to Friston was made. Phase 2 was the critical and only phase of consultation providing the opportunity for communities to comment on the relative merits of the seven substation zones identified by SPR.
13. The Consultation Reports following each Phase of consultation have inaccurately reflected the views of local people.
14. Feedback from the public in Phase 2 Consultation regarding the preferred location of the substation was ignored.
15. SPR admitted publicly that it had not taken into account in its decision making at Phase 3.5 the feedback received from individual members of the public, the two local authorities or the local MP. This is contrary to Section 29 of the Planning Act 2008.
16. The dual Consultations and proposed Applications for two separate projects have been confusing, misleading, unnecessarily complicated and time-consuming for the public to deal with.

## **Legislation**

S47 of Planning Act 2008 places a duty on the Applicant to consult with the local community. A statement setting out how the applicant proposes to consult must be made available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land. The Applicant must publish in a newspaper circulating in the vicinity of the land a notice stating where and when the statement can be inspected and the applicant must carry out consultation in accordance with the proposals set out in the statement.

The Guidance to Pre-Application Consultation published under the Planning Act 2008 gives very clear guidance on how consultation should be conducted, including the following:

- *to allow members of the public to influence the way projects are developed by providing feedback on potential options, providing them with an opportunity to shape the way in which their community develops*
- *to help local people understand better what a particular project means for them, so that concerns resulting from misunderstandings are resolved early*
- *Overall, effective pre-application consultation will lead to applications which are better developed, and in which the important issues have been articulated and considered as far as possible in advance of submission to the IPC. This in turn will allow for shorter and more efficient examinations.*
- *It will also benefit communities, enabling local people to become actively involved in shaping proposals, which affect their local communities at an early stage, where their views can influence the final application.*

*Community involvement should enable people to:*

- *have access to information*
- *can put forward their own ideas and feel confident that there is a process for considering ideas*
- *have an active role in developing proposals and options to ensure local knowledge and perspectives are taken into account*
- *can comment on and influence formal proposals*
- *get feedback and be informed about progress and outcomes*

And the guidance goes on to state:-

*Local people have a vital role to play at the pre application stage. People should have as much influence and ownership as is realistic and possible over the decisions and forces, which shape their lives and communities, and it is therefore critical that they are engaged at an early stage by promoters.*

## 1. Pre-Consultation decisions

Originally, it had been planned that electricity generated by EA2 and EA1N would come ashore at Bawdsey using previously approved ducts along the EA1 and EA3 cable route and connect to the existing National Grid substation location at Bramford. However, following a design change made by SPR for commercial reasons, in the summer of 2017, National Grid offered SPR an alternative Grid connection in the Sizewell/Leiston area.

Neither National Grid nor SPR conducted any consultation with the general public on the decision to change the Grid connection from Bramford to the Sizewell area. This was a major shortcoming and has ultimately led to a greenfield site at Friston being selected for this connection in the place of the existing brownfield site at Bramford. The general public should have been made aware of the consequences of this decision and its views sought through proper consultation.

On 13 July 2017 (Annex 1) SPR advised Planning Inspectorate (PINS) that it was *“in discussions with National Grid regarding the grid connection. These discussions will formally conclude with the next few weeks.”* SPR also advised PINS that *“a newsletter will be published early August. There will be Public Information Days taking place in October and briefings with the leader of Suffolk County Council and the parish councils.”*

SPR published one of its bi-annual Newsletters dated Autumn/Winter 2017 (Annex 2) but this did not contain any further detail, other than the general area where the cables would come ashore. It included no dates or locations given for the forthcoming Phase 1 Public Information Days (PIDs). See last page of the following link:

[https://www.scottishpowerrenewables.com/userfiles/file/the%20east%20angle%20-%20autumn\\_winter\\_2017\\_secured.pdf](https://www.scottishpowerrenewables.com/userfiles/file/the%20east%20angle%20-%20autumn_winter_2017_secured.pdf)

The Newsletter is published on SPR's website. It is unlikely that residents of the potentially affected area would have been alerted to it. Paper copies are not widely available and are usually to be found solely at SPR events.

There was therefore a failure to consult or advise local residents of the proposals for EA1N and EA2 to come ashore “in the vicinity of Sizewell / Leiston” prior to the decision being made by National Grid (NG). This decision was reported to PINS at a meeting on 7 September 2017 (Annex 1) when SPR confirmed a Newsletter was published in August (the fact that this Newsletter contained no detail does not appear to have been reported). PINS advised SPR to produce an indicative layout of the proposed substation and to consult with representatives of the Parish Councils. SPR stated that *“their stakeholder manager has already contacted the closest Parish Councils.”* However, such contact was not established with Friston PC, the closest Parish to the proposed connection (see further on this below).

## 2. Phase 1 Consultation – late October/early November 2017 (including Summary of Environmental Considerations October 2017 and Project Scoping Report mid-November 2017)

Friston Parish Council and residents of the Friston area were not made aware of the Phase 1 Consultation and Public Information Days (PIDs) taking place. This despite EA2/EA1N Scoping Report dated November 2017 and Phase 1 PID Display Board 8 (on display at the exhibitions in late October and still available online) clearly showing the Onshore Study Area including the land of the proposed site to be immediately north of Friston village and some of that land being within the Friston Parish boundary.

In a letter to Mr & Mrs Fincham (who reside just north of the Friston site) of 21 May 2018 (Annex 3), Joanna Young of SPR stated “*Friston Parish Council were not contacted directly as part of Phase 1 (informal consultation) due to the onshore study area not having been identified and defined at this stage*”. It is also noteworthy that the RAG assessments produced later in the Consultation are dated September 2017 (Annex 14) and clearly name the different zones under consideration including that close to Friston.

The same letter also confirms on page 6 that posters advertising the Phase 1 PIDs were sent to a number of Town and Parish Councils, including nearby Aldringham and Knodishall as well as distant Kessingland, but none were supplied to Friston. The omission of Friston would appear to have been deliberate.

The PIDs were advertised in the Lowestoft Journal and the East Anglian Daily Times. The Lowestoft Journal is extremely unlikely to be read by local people in the Onshore Study Area, (Lowestoft being a coastal town some 30 miles away to the north) and few regularly read the East Anglian Daily Times (12,500 copies of the EADT are printed daily whereas the population of Suffolk alone is 757,000). More local publications should have been identified to inform those affected by the proposals.

Four PIDs were held on 30/31 October and 1/2 November 2017 at the following locations:- *Lowestoft, Southwold, Leiston and Orford*. None of these towns are in the Onshore Study Area and only Leiston would likely be impacted by the onshore proposals. No PID event took place within the Onshore Study Area and again this is inexplicable.

Residents in the Friston area therefore had no opportunity to provide feedback at this early stage or complete the Feedback Form. Neither did Friston residents have the opportunity to sign up to receive further information as the projects progressed or have the opportunity to see the Summary of Environmental Considerations dated October 2017.

Owing to this general lack of awareness in Friston, the Parish Council did not respond to SPR’s Scoping Report of November 2017 and residents missed the Summary of Environmental Considerations. It is now known that the Red/Amber/Green (RAG) Substation Site Selection documents for both EA1N and EA2 were produced in September 2017 but withheld from publication until significantly later.

On 25 January 2018 SPR reported to PINS (Annex 1) that it had held workshops with the Parish Councils. There had been no such meeting between SPR and Friston Parish Council by that date and SPR's statement to PINS was therefore untrue.

### 3. Phase 2 Consultation – 6<sup>th</sup> March to 17<sup>th</sup> April 2018 (extended from published date of 3 April) – Site Selection Phase

On 5 February 2018, Joanna Young (SPR Stakeholder Manager) sent an email to Friston Parish Clerk requesting a meeting. This was held on 5 March 2018. The Parish Council Minutes (Annex 4) quote SPR as saying:

*“The areas being investigated to site these new substations have been extended, based on the planning department's recommendation, to come further west from the coast and will possibly be closer to Friston”.*

However at a meeting with PINS on 25 April 2018 (Annex 1), SPR is reported as saying:

*“In January 2018 the LAs considered the western zones for the proposed substation as the best options to avoid impacts on AONB. However following further consideration in March 2018 the LAs thought the eastern zones would be more preferable. The reasons for this were uncertainty about the potential cable route and balance of public opinion.... In conclusion the Applicant considers that the West 1 (previously Zone 7) represents the most appropriate option to be taken forward”.*

Therefore prior to the commencement of the Phase 2 Consultation, SPR were no longer taking account of the LA's position and recommendation.

Again Friston residents were not aware of the Phase 2 Consultation or PIDs at the appropriate time. An extract from Mr & Mrs Fincham's letter to SPR of 3 April 2018 (Annex 3) states:

*“However, SPR has not taken any steps to ensure that the properties most directly affected were notified of these proposals. The inhabitants of Friston (which is immediately adjacent to sites 6 and 7) found out about the proposal only by chance. The Parish Council leafleted the inhabitants (Annex 5) informing the residents of the proposal. This was on 1st April. Before then virtually no one was aware of the plan. A concerned resident passed on the leaflet to us yesterday, 2nd April. Had this not occurred we would have been unaware of the proposal, even though we are located within a hundred metres of Site 7. This is an appalling way in which to treat those most likely to be affected by the proposal. We can only assume that this is reflective of SPR's general strategy towards consultation of the local affected community.”*

It is noteworthy that SPR's response to the Finchams of 21 May came 48 days after their original letter of 3 April and **after** the decision to come to Friston was taken. Such was Mr & Mrs Fincham's concern that they also wrote to the local MP, Therese Coffey on 13 April 2018 (Annex 6).

An email from Ian & Mary Shipman of Friston to SPR of 2 April 2018 (Annex 7) confirms they had only been notified about the Phase 2 consultation a few days before by an email alert from the FPC (dated 29 March 2018 - Annex 8). This confirms it was the first time these residents (and others) had known about the proposed wind farm projects and onshore development. Due to serious complaints

from local people SPR extended the consultation period from 3 April to 17 April.

SPR's letter to Mr & Mrs Fincham of 21 May also discloses that SPR provided flyers advertising Phase 2 to Aldringham Parish Council and Knodishall Parish Council, but **not** to Friston. Why was this? No publicity was provided by SPR to Friston until after the public announcement of its decision to come to Friston had been made following Phase 2. This again appears to be a deliberate tactic on behalf of SPR.

Six PID events took place on 17/18 and 24/25 March at the following locations: *Lowestoft, Southwold, Leiston, Thorpeness, Aldeburgh and Orford*. No PIDs were held in the western zones of the Onshore Study Area, despite these being under active consideration by SPR.

The Feedback Form (Annex 9) included very leading questions, such as "*In your view, should potentially adverse visual impacts on the AONB be avoided by placing our substations west of the Aldeburgh Road*". Despite this leading question, 54 people answered 'yes' but 55 answered 'no'. SPR ignored the outcome of this question in their decision making. Further in their analysis of the postal feedback SPR (Annex 10) identified 29 people who would prefer a coastal location and only 3 in favour of zones 5, 6 or 7. Again this has been ignored by SPR.

A further question asked "*In your view in order to cross Aldeburgh Road (B1122) would it be acceptable to have a direct impact on residential property?*" This is a totally leading question and the Feedback Form gave no other opportunity to comment on the merits or demerits of any of the seven zones, other than at Question 10 which asked for additional comments about the PID events or SPR's proposals. The Phase 2 Consultation was flawed and invalid due to the bias in the site selection questions and SPR's failure to take responses to Question 10 into account.

The Statements of Community Consultation (SoCC) were published during the Phase 2 Consultation. These documents were subsequently reported to be available in the following locations:- *Saxmundham, Leiston, Aldringham, Southwold, Orford, Lowestoft, Kessingland and SCDC's offices in Woodbridge*. This is contrary to the "Notification of Statement of Community Consultation" (Annex 11) which suggests the document would be available in Friston and other villages, which was not the case.

SPR's has claimed that its draft SoCCs were reviewed with the LA in January 2018. Final draft SoCCs for EA1N and EA2 were issued to the general public for consultation on 13 March 2018 and the deadline for public comments stated to be 3 April 2018, the same end date of the Phase 2 Consultations themselves. Thus, contrary to S47 of PA2008 Final, approved SoCC's were **not** in place before formal Consultations were underway.

The SoCC was not provided to Friston Parish Council and owing to the village having been omitted from Phase 1, residents were not signed up for email updates from SPR. Residents were not aware that they could respond to this SoCC and it passed without comment from those in Friston, who might quite rightly have complained about not being consulted in Phase 1 and the subsequent delay in notification of Phase 2.



At its meeting with PINS on 25 April 2018, (Annex 1) SPR advised that *“they intend to publish an Interim Consultation Report to show how the consultation comments and responses have been considered so far”*. This document “Public Information Days Feedback Summary 17 March 2018 -25 March 2018” dated 10 May, (available online) gives no explanation as to why the preference of local residents for a coastal location to the substation was ignored.

Friston Parish Council requested that SPR attend a meeting to explain the current position and a meeting was arranged on 16<sup>th</sup> April 2018. The Minutes of that meeting (Annex 12) record *“Following the presentation on 5<sup>th</sup> March, there were a number of information days where statements were made that inferred that site 7, which strongly affects Friston Parish residents, is the preferred site. Scottish Power Renewables were asked to come back and clarify this as no mention had been made of any preference in the original presentation (held on 5<sup>th</sup> March).”*

SPR’s representatives said to PINS on 25 April 2018 (Annex 1) that at Phase 1 they were looking at sites nearer the coast but that the LPA suggested they look further west. *“Following the subsequent assessment, western areas were preferred due to the eastern sites being partly or all within the AONB”*. *“They (SPR) reiterated that no final decision has been made. However, after having considered all the points and assessing them under a RAG process (actually produced in September 2017) they have prioritized 3 sites. 1 in the East and 2 in the West, however as the 1 in the east is impacting on the AONB, the 2 in the west are preferred.”* SPR were to communicate their decision to the LPA in the following two weeks (this was done on 30 April) and an announcement would be made in mid-May. County Councillor Reid stated that the LAs’ position was to support sites in the East as they had less impact and he also raised the issue of the two forthcoming Interconnector projects.

It can therefore be clearly seen that the majority of residents in Friston had no knowledge of the existence of the proposed EA1N and EA2 projects until at least the **end** of March 2018 and a decision was taken by SPR to come to Friston well before the **end** of April, if not substantially earlier than that. Recommendations from the LAs for a coastal site and the preference of local people for a coastal site were totally ignored by SPR.

#### **4. Phase 3 Consultation 13<sup>th</sup> May – 28<sup>th</sup> August 2018** (following selection of Friston as the preferred site)

On 16 May SPR provided PINS (Annex 1) with *“an overview of different consultation activities proposed linked to the SoCC, including publication of a booklet confirming the selection of W1 zone (renamed Zone 7) as the preferred site for the substations”*. (It is regrettable that SPR re-numbered the zones as this only creates confusion when checking back through documents).

Phase 3 was the first time that SPR organized a PID event in Friston itself, however this was **after** its site selection decision had been made. A public meeting with SPR was held on 24<sup>th</sup> May 2018 in Friston Village Hall. The village was in shock at being told that Friston had been selected as SPR’s preferred site only 6 weeks after first hearing about the consultation at all. A show of hands at this meeting showed that

there had been a complete failure by SPR to engage with those residing within the Onshore Study Area due to inadequate communication. A further show of hands of approximately 100 people present showed that a site at Sizewell was preferred. When a similar poll at SPR's meeting in Aldringham produced the same unanimous result, SPR stated that it would not be taken into account or notified to the Planning Inspectorate.

Summary Slides of the RAG assessments for the SPR substation zones were first produced to the public at this meeting on 16 May 2018 (although they had been prepared in September 2017 – see Phase 4 PIER documents Appendix 4.1 RAG Assessments, page 25 onwards –Annex 13). SPR was asked to produce the documentation supporting these RAG assessments, including the two SPR substations and the NG substation, but these documents were refused. SPR's refusal to produce these documents is unreasonable and it has since become evident that a RAG for the NG substation has been available since September 2017 (Annex 14) but SPR failed to disclose it until the Phase 4 Consultation in 2019.

Further the RAGs, which have eventually been made available, only assess each substation in its own right. Cumulative effect of all three substations has not been assessed, let alone the likely addition of the two Interconnectors, Nautilus and Eurolink, which are due to come ashore in the Sizewell area and link to the proposed NG substation at Friston.

There are other major flaws in these RAG assessments, including the omission of surface water flooding, wrong assessment of access roads and landscape qualities, as well as the omission of Grove Wood as a designated Local Wildlife Site. The RAG Assessments for the SPR substations are completely flawed as a basis for site selection and consultation.

Two PIDs in Friston were then held on 29<sup>th</sup> June 2018 and 28<sup>th</sup> July 2018. These defined Zone 7 as SPR's "refined area of search". Little other information was provided, other than five photomontages, see: [https://www.scottishpowerrenewables.com/userfiles/file/EA1N2\\_onshore\\_substation\\_photomontage\\_booklet.pdf](https://www.scottishpowerrenewables.com/userfiles/file/EA1N2_onshore_substation_photomontage_booklet.pdf) which show that the exact site of the now proposed substations had already been determined and that the term "refined area of search" was misleading.

PINS minutes of a meeting with SPR on 20<sup>th</sup> June (Annex 1) reveal its concerns about EA1N and EA2 being treated as two separate projects and being submitted along identical timelines. SPR was asked to provide reasons for this. The consultation process has been made greatly complicated for stakeholders to understand in that, although the PIDs showed the development of two SPR and one NG substation as one project, it was necessary for stakeholders responses to be submitted separately on EA1N and EA2 to different email addresses. Also, SPR has not addressed the cumulative impact of these three substations consistently and this is a major failing of the consultation documents. For example noise levels are identified for EA2 substation only and not in combination with EA1N or indeed the NG substation, for which no noise data was provided at all.

On 1<sup>st</sup> August 2018, SASSES made a Formal Complaint to PINS (Annex 15) relating

to the Consultation managed by SPR for EA1N and EA2 and requested that the Consultation be halted. The letter chronicled the failings and errors made in the Consultation up to that date. Unfortunately PINS was unable to consider this as a Complaint at the time and SASES was referred back to the Developer, SPR.

On 5<sup>th</sup> September 2018 the LAs met with PINS (Annex 1) and re-iterated their concerns relating to SPR's choice of location for the substations, which they stated was also shared by many local residents. The preference for a coastal location was clearly demonstrated in the responses made by local people to the Phase 2 Consultation (Annex 10)

### **5. Phase 3.5 – 29<sup>th</sup> September to 12 November 2018 (Additional Site Selection Phase)**

At the request of the LAs an additional round of consultation was undertaken to assess the suitability of the Friston site compared to Broom Covert at Sizewell, neighbouring the Sizewell A & B nuclear complexes. There was much emphasis on a further RAG assessment produced to compare the two sites. Again the NG substation was not included in the RAG assessment.

On 5<sup>th</sup> November, Mary Shipman queried the omission of the NG substation with SPR. SPR's response (Annex 16) was *"There has been a RAG Assessment carried out for the National Grid substation, however this is not our document to publish currently. However it will be available at Phase 4."* This was a totally unsatisfactory response as it had always been SPR's intention to submit an application to include the National Grid substation (on NG's behalf). The relevant documents should properly have been made public. It would appear that there has been a lack of candour, transparency and professionalism in SPR's consultation process. Stakeholders are still awaiting proper proposals for the NG substation at the date of writing this report.

On 4<sup>th</sup> December 2018, only 3 weeks after the close of the consultation, SASES was advised by SPR that it had chosen Friston as its preferred site. Not surprisingly the impression was that SPR had not seriously considered the feedback from the Consultation in dismissing Broom Covert as an option. SPR admitted publicly at a presentation to Friston on 10<sup>th</sup> December 2018 that it had not acknowledged the views of the LAs, the local MP (Therese Coffey) or of feedback from the general public during the Phase 3.5 Consultation.

On the same day, 10<sup>th</sup> December, SPR advised PINS (Annex 1) it would be taking Friston forward and *"intended to provide full justification of the site selection in the PEIR"*. SPR also advised it would submit draft documents 6 months ahead of the Application and confirmed it would be building EA2 first. SPR also confirmed they had only included SZC in their cumulative impact assessment at this stage.

## 7. Phase 4 Consultation 16<sup>th</sup> February to 26<sup>th</sup> March 2019 (Section 42/PEIR)

This was a short consultation period of just five weeks, too short considering the vast amount of documentation provided for two major infrastructure projects. It was impossible for the average person to assimilate this information in the time allowed. Much of the important detail was buried deep within the Appendices, including for example the Cultural Heritage Assessment and the NG RAG assessment. The Cultural Heritage Assessment identifies several properties, which require in depth assessment and the NG RAG shows that Friston is far from the most suitable site (being 4<sup>th</sup> in order of suitability).

Very little information was provided on the NG substation and certainly not enough for stakeholders to provide any feedback whatsoever. With regard to cumulative impact, the NG substation was again excluded and outdated Sizewell C data was used. Neither were the Interconnectors taken into account, despite National Grid Ventures (NGV) consulting with officials of the AONB in December 2018 and with local stakeholders early in 2019.

The public has never been consulted on the peripheral works, which include the addition and re-alignment of pylons together with buildings described to be sealing end compounds. There has also been no information on the construction process of the NG substation including access and contractors' compounds and how these relate to the proposed SUDs ponds, which will need early construction. Residents were entitled to have the opportunity to comment on these proposals.

The information boards at the PIDs contained some misleading information or simply deferred any action to a later date, e.g.

*"No significant effects on tourism and recreation are predicted"*

*"Through the DCO process noise limits will be tightly controlled and agreed with the LA prior to construction"*

*"Direct impacts on Heritage features have been avoided. Further work will be undertaken prior to DCO application for impact on heritage assets."*

Residents and business people quite rightly expect full and proper information on these important issues to be provided in the consultation process.

Further it is unreasonable of SPR to propose such important issues as noise and flooding to be left to the LAs to decide **after** DCO approval. These issues need proper consultation with those most directly affected i.e. the residents in the Friston area.

Similarly the Non-Technical Summary, which was provided to attendees at the PIDs contained statements such as:

*"Cumulative impacts with Sizewell C (SZC) assessed no greater than minor"* (This statement is meaningless as SPR had referred to outdated SZC information).

*"Significant operational visual effects would be experienced only at Saxmundham Road, Aldeburgh Road, Friston Area C and Grove Road Section B."* This is an understatement and in any event relates to approx. 50% of the village area.

Again documents were produced separately for EA1N and EA2, leading to confusion

and an overburden of paperwork. For example, many residents were confused by the width of the haul road/cable run being described as 32m when in fact it would be 64 metres were both projects to be consented.

On 25<sup>th</sup> February 2019 SPR confirmed to PINS (Annex 1) that it meets regularly with National Grid Ventures to obtain updates on their project status. PINS advised SPR that cumulative impacts should be integral to the EIA. SPR's failure to address cumulative impacts with the NGV Interconnector projects is unacceptable.

## **8. Events following Phase 4 Consultation**

On 29 April 2019, just four weeks after the close of SPR's Phase 4 Consultation, NGV notified PINS of its Nautilus Interconnector project using the map reference 52°11'46N 1°31'59.8E being the current proposed location of the NG substation and SPR's EA2/EA1N substations in Friston.

It should be noted from PINS Minutes of 25 April 2018 (Annex 1) that SPR reported to PINS that they *"have considered the NGV projects in their site selection and made commitments not to sterilise NGV's ability to develop their projects. The applicant advised they will follow the Planning Inspectorate's Advice Note 17 on cumulative impact assessment"*.

SPR has not met this commitment on cumulative impact assessment and have subsequently confirmed in a meeting in Friston on 12<sup>th</sup> July 2019 that they do not consider they have a duty to consider cumulative impacts with the NGV Interconnector projects.

In July 2019 NG produced a Briefing Pack for the Nautilus Interconnector including a map showing a potential site in the same Friston location (Annex 17). Text in this document reads *"From this NGET have provided a Connection Agreement to use a new 400 kilovolts substation provisionally referred to as 'Leiston 400kV substation'. This is the same substation that Scottish Power Renewables offshore windfarms East Anglia 1N and 2 are proposed to be linked to. NGIH, SPR and NGET are currently working on the premise that all projects will be connecting to the same substation – 'Leiston 400kV substation'.*

On 7 May 2019 SPR reported to PINS (Annex 1) that it was making a dual application for "commercial reasons". Later on 21 May PINS (Annex 1) advised that *"it is possible to submit one DCO application for two NSIPs and also possible to go through the CfD process with a single DCO for two NSIPs."*

It is unfair to burden the tax payer, local authorities and concerned residents with the additional expense of dealing with two separate DCO applications both in terms of making representations and attending hearings.

SPR published a response to the Phase 4 consultation in June (available online), some three months after its close. This 26-page document has only one single page which contains comments made by the community and even that is inaccurate and incomplete.

SPR last met with Friston Parish Council and SASES on 12 July 2019 to present SPR's "Update of our Plans" document (available online). This was a deeply unsatisfactory meeting with SPR refusing to supply any further information until after acceptance of the DCO application. SPR reported to PINS (Annex 1) that this meeting would be a presentation of the "Masterplan for the Substations". This was far from the experience residents had, with blurred images of critical plans and very little detail. The notes of the meeting later supplied by SPR (Annex 18) were incomplete and inaccurate.

Residents of Friston have repeatedly advised SPR of the existing problems with surface water flooding, whose origins are in the proposed substation site and the haul road north of Friston. SPR, knowing there is an existing problem, has studiously avoided examining the effects of their proposals, which would inevitably exacerbate the problem.

At the meeting David Walker of SPR agreed to send a flood engineer to Friston to meet with SASES and the Parish Council. SPR's notes of the meeting (Annex 18) however record that "*this is likely to take place at the discharge of condition stage.*" This is yet another example of SPR not acknowledging serious problems during consultation. Details of tree species and planting details, as well as irrigation and maintenance were requested but again refused by SPR. SPR also refused to provide photomontages showing the growth of trees at project completion and at five year intervals thereafter.

SPR also announced at this meeting that it was bringing forward its construction programme to commence in mid-2023 and complete 2025/2026, with the NG substation being constructed during a 12 month period. Again a deviation from SPR's published proposals.

Notes of a meeting of SPR with PINS on 16<sup>th</sup> July 2019 (Annex 1), when the draft DCO documents (submitted in May 2019) were reviewed, record more disturbing information. Having consulted stakeholders on a 32M cable corridor for each project up to 26 March 2019, documents inferring that the cable corridor would be widened up to 90M in certain locations such as the Aldeburgh SSSI and Sandlings SPA, as well as the Hundred River. This is a very significant increase of over 40% and there has been no consultation on this whatsoever. In their draft DCO Chapter 12, SPR has also requested a swathe of 70M wide for the two projects. How could such a need for the cable corridor of this width have increased so significantly following the close of Phase 4? It would appear that SPR may have presented the public with incorrect or incomplete information.

Of further concern in the last week of August 2019 there was a public announcement of the approval of the extension of the Greater Gabbard and Galloper wind farms whose existing substations are located at Sizewell. These projects will shortly also enter the planning system and the proposed location of their onshore substations will be revealed. It is essential that these two further wind farm projects should form part of the cumulative impact assessment for EA1N and EA2 and the onshore development properly assessed.

**Conclusion**

SPR's Consultation with the local community has been characterized by failure to adhere to the spirit of the Section 47 of the Planning Act 2008 and failure to follow the Guidelines for Pre-Application Consultation. The Consultation also fails to conform to SPR's own Statement of Community Consultation. This SASES report concludes that SPR's Pre-Application Consultation has been completely inadequate as a basis for acceptance of SPR's Application for two Development Consent Orders for Nationally Significant Infrastructure Projects.

Signed

.....  
**M Caplin**  
**Chairman**  
**Friston Parish Council**

Dated ..... September 2019

*Responses to this document may be sent to SASES at the following email address:*  
[mary@foreburyestates.co.uk](mailto:mary@foreburyestates.co.uk)





## List of Annexed Documents

1. Notes of Meetings with PINS from 13 July 2017 to 16 July 2019
2. Article from SPR's 'East Angle' Newsletter Winter 2017/18
3. Letter from SPR to Mr & Mrs Fincham of 21 May 2018
4. Extract from the Minutes of Friston Parish Council of presentation from SPR on 5<sup>th</sup> March 2018.
5. Leaflet distributed by Frison Parish Council on 29 March 2018
6. Email and enclosure from Mr & Mrs Fincham to Therese Coffey MP of 13 April 2018.
7. Email from Friston Parish Clerk to Mary Shipman of 29 March 2018
8. Email from Ian & Mary Shipman to SPR of 2 April 2018
9. SPR's Feedback Form from the Phase 2 Consultation
10. Royal HaskoningDHV's analysis of the Feedback received at Phase 2
11. SPR's Notification of Statement of Community Consultation of March 2018
12. Extract of Minutes of Friston Parish Council of presentation by SPR on 16<sup>th</sup> April 2018 and slide on site selection
13. Extract from Appendix 4.1 of SPR's Phase 4 Consultation
14. RAG Assessment of the National Grid substation first published in Phase 4 Consultation and dated September 2017
15. Formal letter of complaint from SASES to PINS of 1 August 2018
16. Email from SPR to Mary Shipman of 8 November 2018 regarding the RAG Assessment for the NG substation
17. Extract from National Grid's "Briefing Pack for the Nautilus Interconnector" of July 2019
18. SPR's Action List following its meeting with SASES/Friston Parish Council on 12 July 2019

## **Annex 1**

### **Notes of Meetings with PINS 13 July 2017 to 16 July 2019**



## Meeting note

<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	Siân Evans
<b>Date</b>	13 July 2017
<b>Meeting with</b>	Scottish Power Renewables
<b>Venue</b>	Teleconference
<b>Attendees</b>	<b>The Planning Inspectorate</b> Chris White (Infrastructure Planning Lead) Siân Evans (Case Officer) Gail Boyle (Senior EIA and Land Rights Advisor) Alison Down (EIA and Land Rights Advisor) <b>Scottish Power Renewables</b> Jon Allen Helen Walker
<b>Meeting objectives</b>	Update meeting on the East Anglia ONE North and East Anglia TWO projects
<b>Circulation</b>	All attendees

### Summary of key points discussed and advice given:

#### Introduction

The Applicant and the Planning Inspectorate (the Inspectorate) case team introduced themselves and their respective roles. The Inspectorate continued by outlining its openness policy and ensured those present understood that any issues discussed and advice given would be recorded and placed on the Inspectorate's website under s51 of the Planning Act 2008 (PA2008). Further to this, it was made clear that any advice given did not constitute legal advice upon which the Applicant (or others) can rely.

#### General project update

The Applicant is in discussions with National Grid regarding the grid connection. These discussions will formally conclude within the next few weeks.

As part of the Applicant's consultation, prior to EIA scoping for November 2017, a newsletter will be published early August. There will be Public Information Days taking place in October and briefings with the leader of Suffolk County Council and the parish councils.

Surveys are due to take place March 2018.

The Applicant proposes to submit the scoping reports for both projects in November 2017. The scoping reports will be based on study areas, rather than a site red line boundary.

### **Evidence Plan**

A new Seascape, Landscape and Visual Impacts topic group has been set up. This includes local authorities within a 50km radius of the proposed turbines and the invite will be extended to include Natural England for future meetings. The group will agree the viewpoints for the assessment. The Applicant advised that Suffolk County Council does not currently have a seascape character assessment in place, which would inform the Applicant's assessment.

The Marine Mammals topic group meeting was held on 30 May 2017 where the HRA methodology and species to be assessed were discussed.

The Applicant advised that they will be holding a refresher topic group meeting to determine whether the approach to the Evidence Plan needs to be updated.

The Applicant advised that they would like the methodology that's been agreed to be taken into account by the Inspectorate when producing the scoping opinion and enquired whether Steering Group minutes could be published on the Inspectorate's website. The Inspectorate advised that only information included in the scoping report can be considered and suggested that the Applicant could either include those minutes as appendices to the scoping report or summarise the methodology in the environmental statement.

### **Radar/Aviation**

The Applicant advised that they intend to engage with the Ministry of Defence prior to submitting their scoping report.

### **AOB**

The next meeting will be 7 September 2017.



## Meeting note

<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	Ewa Sherman
<b>Date</b>	7 September 2017
<b>Meeting with</b>	Scottish Power Renewables
<b>Venue</b>	Temple Quay House, Bristol
<b>Attendees</b>	<b>The Planning Inspectorate:</b> Chris White (Infrastructure Planning Lead) Kay Sully (Case Manager) Ewa Sherman (Case Officer) Alison Down (EIA and Land Rights Advisor) Katherine King (EIA and Land Rights Advisor) <b>Scottish Power Renewables:</b> Jon Allen (Principal Environmental Consultant – RHDHV) Helen Walker (Senior Project Manager)
<b>Meeting objectives</b>	Update meeting on the East Anglia ONE North and East Anglia TWO projects
<b>Circulation</b>	All attendees

### Summary of key points discussed and advice given:

#### Welcome and Introductions

The Applicant and the Planning Inspectorate (the Inspectorate) team introduced themselves and their respective roles. The Inspectorate outlined its openness policy and ensured that those present understood that any issues discussed and advice given would be recorded and placed on the Inspectorate's website under section 51 of the Planning Act 2008 (PA2008). Further to this, it was made clear that any advice given did not constitute legal advice upon which the Applicant (or others) can rely.

#### Projects update

As a consequence of changes in the proposed export capacity and changes in the generation background National Grid have reviewed the projects connection options and are varying the connection locations; which means that the connection point for both projects will be in the vicinity of Sizewell / Leiston.

The offshore cable routing has been informed by the locations of existing soft constraints such as avoiding known sandbanks, and also hard constraints, such as the cable routes for EA1 and EA3 and Galloper and Greater Gabbard Offshore wind farms, and the proposed Sizewell C Nuclear Power Station project offshore infrastructure

The exact position of the cable landfall has not been determined but this will be refined through ongoing investigative work and consultation with relevant statutory stakeholders. Each project will require its own landfall. In order to minimise construction impacts the intention is that the first project (East Anglia TWO) would install ducts for both projects. The second project construction would then only require cables to be pulled through the pre-installed ducts.

The onshore site selection for new substation locations is ongoing. Sites in proximity to the existing overhead lines would be the most effective method to connect to the national grid. The Applicant will be required to build a new substation for each project and additionally a new National Grid facility will be required. The applicant confirmed it intends to include infrastructure required for National Grid in their application. Detailed information will be included in the DCO.

Details of the existing and new data collection required is being discussed with the Local Authorities (LAs), Marine Management Organisation (MMO), Natural England (NE) and Historic England (HE), and detailed information will be included in the Scoping Report.

The Inspectorate advised that a shapefile to generate a list of consultees will be required ten working days before the scoping request is submitted, which is currently timetabled for November 2017. The Applicant confirmed that separate Scoping Reports will be submitted for both EA1N and EA2.

Further surveys and site investigations will take place between now and March 2018 to define the project area.

### **Consultation update**

As planned, a newsletter was published in August 2017, and the four public information days with the local community will be taking place in the last week of October 2017.

The Applicant confirmed that later this month (20 September 2017) it will be meeting with the LAs to share the latest information in relation to the proposed onshore study area. The offshore surveys have been shared with the MMO, NE and the Royal Society for the Protection of Birds (RSPB). The Applicant will provide a summary of any changes of the updated Evidence Plan.

The Applicant has started engaging with the local Councillors, MPs and tourist bodies to ensure that they are aware of the change of the proposed grid connection. The Inspectorate queried if the Applicant would be able to have an indicative layout of the proposed substation before consulting with the public at the end of October. The Applicant confirmed that this would be available. The Inspectorate advised the applicant to consider meeting jointly with representatives of the Parish Council to ensure a robust process. The Applicant confirmed that their stakeholder manager has already contacted the closest Parish Councils.

The Applicant also confirmed that they are reviewing 'lessons learned' from EA1 and EA3 in terms of the continuing engagement with the LAs regarding the required permits and justification for the need for the mitigation land when considering compulsory acquisition of land.

The Inspectorate advised to make it clear when consulting that the Applicant considers this a study / survey area, rather than a red-line boundary at this stage.

The Inspectorate also requested to be updated of any consultation events and feedback from these events, and advised the Applicant to keep a log of engagement in relation to the negotiations with the landowners for the purpose of the compulsory acquisition.

**AOB**

Date for the next meeting (telecon) is 19 October 2017.



# Meeting note

**Project name** East Anglia ONE North and East Anglia TWO  
**File reference** EN010077 and EN010078  
**Status** **Final**  
**Author** The Planning Inspectorate  
**Date** 25 January 2018  
**Meeting with** Scottish Power Renewables  
**Venue** Temple Quay House, Bristol  
**Attendees** **The Planning Inspectorate**  
Chris White – Infrastructure Planning Lead  
Kay Sully – Case Manager  
Ewa Sherman – Case Officer  
Gail Boyle – Senior EIA and Land Rights Advisor  
Alison Down – EIA and Land Rights Advisor  
Katherine King – EIA and Land Rights Advisor  
**The Applicant**  
Alex Hampson - Senior Environmental Consultant, RHDHV  
Paolo Pizzolla – Technical Director, RHDHV  
Helen Walker - Senior Project Manager, ScottishPower Renewables  
**Meeting objectives** Project update meeting  
**Circulation** All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 (s51) of the Planning Act 2008 (the PA2008). Any advice given under s51 would not constitute legal advice upon which applicants (or others) could rely.

## Welcome and introductions

The Applicant and the Inspectorate team introduced themselves and their respective roles. Alex Hampson was introduced as a new consent manager for the East Anglia TWO (EA2) project, and he will be working with Helen Walker and the EA2 project managers. Holly Cartwright will work on the East Anglia ONE North (EA1N) project.

## Project update

The Applicant advised of the forthcoming programme for both projects which are currently being managed simultaneously. In relation to EA2 the Applicant expects to publish the finalised Statement of Community Consultation (SoCC) in March 2018, followed by holding the public information days on the weekends of 17/18 March and 24/25 March to ensure that weekend visitors to the area have an opportunity to familiarise themselves with the proposal. Further information days are scheduled for



June and November 2018. Statutory consultation under s42 of the PA2008 is due to be conducted in November 2018, and the submission of the Development Consent Order (DCO) application is expected in March 2019.

With regard to EA1N, the Applicant advised that the finalised SoCC will also be published in March 2018, followed by s42 statutory consultation in November 2019, and the submission of the DCO application in March 2020. The Inspectorate raised a query with regard to the publication of the SoCC in tandem, given the difference in timescales for submission of the projects. However, the Applicant followed Local Authorities' advice and confirmed the intention to refresh the SoCC for EA1N if required to ensure the clear distinction between projects.

The Applicant provided an update regarding the results of surveys and the continuous engagement with the Expert Topic Groups (ETGs). Results of the ongoing offshore surveys will be discussed at ETGs. Onshore surveys, such as those relating to breeding birds, will commence in mid-February / early March 2018. The Applicant is conscious of the neighbouring proposed developments such as Sizewell C Nuclear Power Station and does not intend to carry out any onshore area studies that would extend into the land in EDF's ownership.

### **Scoping Opinion**

Following the issue of the Scoping Opinion, pursuant to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, by the Inspectorate on 20 December 2017, the Applicant enquired whether their understanding was correct that aspects and matters that it had not been agreed in the Scoping Opinion could be scoped out could subsequently be scoped out from the EIA with relevant consultee agreement and thorough justification in the ES.

The Inspectorate confirmed that this was the correct interpretation of the Regulations, and the advisable course of action would involve providing an explicit agreement log presenting all matters that had been scoped out. The agreements could be reached through the ETG process, documenting consultees' opinions, and providing detailed reasoning within the Preliminary Environmental Information Report (PEIR) and later in the Environmental Statement. The Applicant confirmed the scoping process facilitated by the Inspectorate has been very beneficial, and also mentioned the usefulness of the continuous engagement with the statutory consultees such as the Marine Management Organisation and Natural England.

The Inspectorate advised that the mitigation proposed by the Applicant could be summarised in the ES as long as clear cross-reference was made to the relevant measures and their location in the application documents was identified, such as, for example, within a Construction Environmental Management Plan (CEMP) or a Waste Management Plan (WMP). The Applicant confirmed that the additional certified documents will be submitted with the DCO application to ensure that all mitigation can be secured and delivered.

The Applicant stated that although it had received objections from the Ministry of Defence (MoD) with regard to aviation issues, it expected to be able to agree potential mitigation to cover the East Anglia THREE, East Anglia ONE North and East Anglia TWO



projects by the time the DCO application is submitted. Similarly, the Applicant is currently involved in negotiations with NATS aimed at resolving their objections.

The issue of cumulative impacts of the Proposed Developments was also discussed during the meeting. The Applicant stated that the cumulative offshore impacts of all projects within the North Sea area have been discussed at the Southern North Sea Offshore Wind Forum to try to find a way that they can be addressed by the industry. There is a recognised need for a common agreed approach in relation to the capacity of all projects that have been consented but not yet built, as well as the various parties' approach to ensure that descriptions of the proposed projects are provided in the same way to avoid potential confusion, and to agreeing the Evidence Plans. In relation to the onshore impacts the Applicant confirmed that it has received a joint response from the Local Authorities (LAs) on the potential landscape, visual and infrastructure impacts.

The Applicant advised that the onshore study to finalise the red line boundary is ongoing. Phase 1, the definition of study area, has been completed and the Applicant is currently at Phase 2, identifying preferred zone(s) for the substation sites. This will be followed by the micro-siting arrangements for the substation location (within preferred zones) in March / April 2018 (Phase 3), and then the identification of the preferred cable route (Phase 4). The Applicant has held workshops with the LAs, Parish Councils and other statutory consultees, as well as the local landowners, and intends to present the projects' final red line boundary at the public information day in June 2018.

The Applicant confirmed that it has been working with National Grid, and also undertaken an additional assessment of the AONB to inform the site selection, as part of the onshore study area and site selection. The Inspectorate advised the Applicant to continue collaborating with other parties; and to demonstrate that the Applicant has considered alternative routes for the proposed cable corridors where appropriate. Additionally, in the absence of the finalised red line boundary the Applicant was advised to use baseline data to help site selection and to inform the PEIR for the future statutory consultation. With regard to onshore site selection and potential cumulative impacts, The Inspectorate advised the Applicant to review the decision on the Triton Knoll Offshore Wind Farm and the interaction with a potential interconnector project. The Inspectorate also advised the Applicant that their cumulative impact assessment would be examined with regard to the advice contained in The Inspectorate's 'Advice Note Seventeen: Cumulative Effects Assessment', with particular reference to the 'tiered' approach to the consideration of other developments.

The Applicant confirmed its intention not to use powers under s53 of the PA2008, relating to authorisations for rights of entry to land to carry out surveys.

The Inspectorate also suggested looking at the document called 'Guide to the Application' which was provided by National Grid for the Richborough Connection Project, and was updated at each Examination deadline. It can be found here: [Guide to the Application](#). Applicants are advised to consider including a 'Guide to the Application' as part of the suite of application documents at submission, and to update it at every Examination deadline as it has proved to be very useful to the Examining Inspectors and Interested Parties in past Examinations. Other good example documents can be found on our website at the link here: [Good example documents](#).



The Applicant advised that, in light of additional information from The Crown Estate, it will be making some minor amendments to the offshore area of search (red line boundary). The Applicant stated that this will not introduce any new consultees, or receptors or impacts from those assessed during the scoping phase. The Inspectorate advised that on that basis it did not appear necessary to re-scope following these amendments (although that is a matter for the Applicant).

The Applicant advised that it intends to look into creating and using a 'digital Environmental Impact Assessment' for future projects, in parallel with the traditional form of the documentation. The plan is to develop a platform this year, update it for the EA1N PEIR, and request feedback from potential users. The Applicant's intention is to have a fully functional platform for the EA1N project. The Applicant confirmed that it would welcome feedback/ input from the Inspectorate.

## **Specific decisions/ follow-up required**

The following actions were agreed:

- The Inspectorate advised that during the scoping process some consultees were missed; however, this will be rectified shortly to enable all statutory consultees (undertakers) to provide comments.
- The Applicant and the Inspectorate agreed to continue the six-week update meetings, with the next teleconference to be scheduled at the end of March / beginning of April 2018.

# Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	25 April 2018
<b>Meeting with</b>	Scottish Power Renewables
<b>Venue</b>	Rivergate, Bristol
<b>Attendees</b>	<b>The Planning Inspectorate</b> Chris White – Infrastructure Planning Lead Kay Sully – Case Manager Ewa Sherman – Case Officer Gail Boyle – Senior EIA and Land Rights Advisor (dialling in) <b>The Applicant</b> Alex Hampson - Senior Environmental Consultant, RHDHV Helen Walker - Senior Project Manager, ScottishPower Renewables
<b>Meeting objectives</b>	Project update meeting
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 (s51) of the Planning Act 2008 (the PA2008). Any advice given under s51 would not constitute legal advice upon which applicants (or others) could rely.

## Welcome and introductions

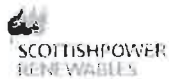
The Applicant and the Inspectorate team introduced themselves and their respective roles.

## Project update

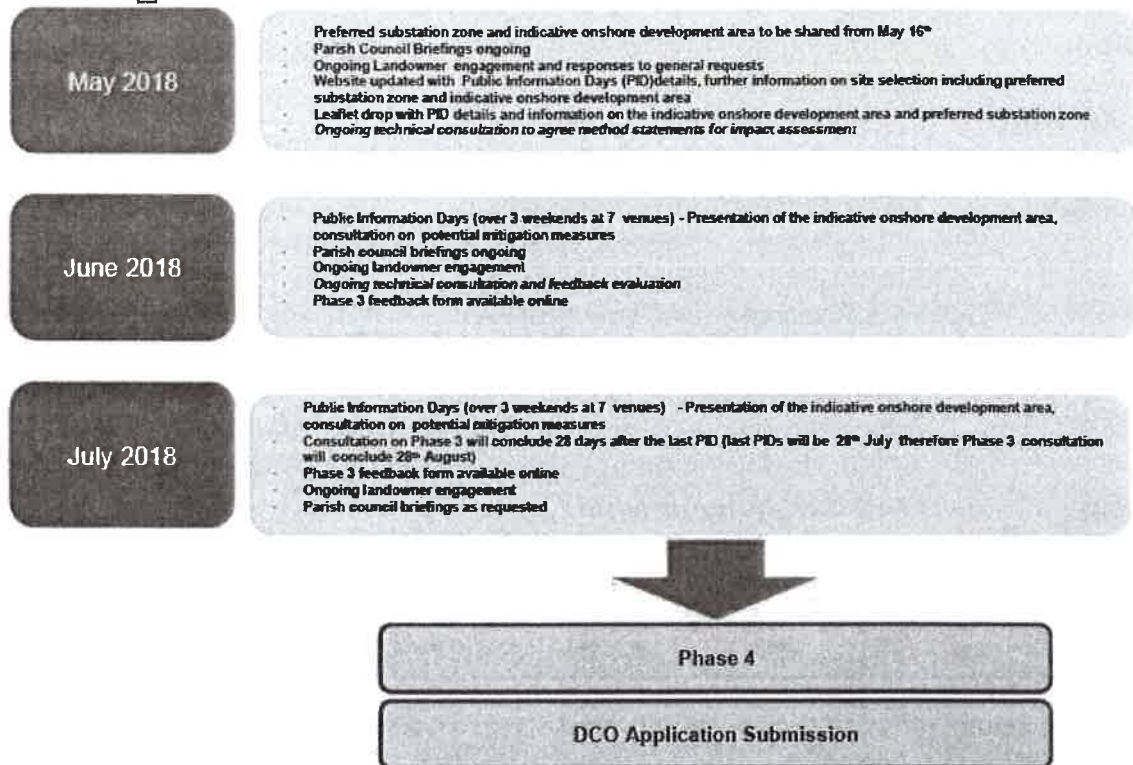
The Applicant provided a summary of actions in respect of the onshore site selection process to progress the onshore development area boundary, and advised of the key constraints affecting the study, such as the Suffolk Coast and Heaths AONB, unsuitability and unavailability of EDF land, proximity to the overhead electricity line, crossing points on the Aldeburgh Road between western and eastern areas, and access to the proposed areas for a substation (vehicle, permanent and for construction). Definition of onshore study area, identification of seven potential substation zones) and selection of the preferred substation zone have been completed. The Applicant is now working on the micro-siting of substations with the selected zone and identification of the preferred cable route. Feasibility studies in relation to the access to the proposed substation have also been completed. The Applicant advised that they are now undergoing extensive



consultation (Community Consultation Phase 3) with stakeholders and the public regarding the substation zone selection and details of future engagement on mitigation and cable routing. The flow chart below provides details of Community Consultation Phase 3.



## Phase 3 (16<sup>th</sup> May- 28<sup>th</sup> August)



The Applicant advised that an Indicative Onshore Development Area boundary will be ready for presentation at the Public Information Days (PID) in June/ July 2018.

Applicant's post meeting note: Following discussion with the Local Authority (LA), the Indicative Onshore Development Area boundary has been prepared and is being used from the commencement of Community Consultation Phase 3.

The Applicant confirmed the ongoing stakeholder management with statutory bodies such as Environmental Agency, Historic England, Natural England and the continuous engagement with the LA.

### Cumulative assessment

The Applicant provided an update on the cumulative assessment in relation to the proposed National Grid Ventures (NGV), and five potential projects: NGET substation – associated with three East Anglia projects, and two interconnectors (applications to be determined under TCPA by the LAs). The Applicant stated that it is not engaged in master-planning energy in the area but have considered the NGV projects in their site selection. The Applicant has made commitments not to sterilise NGV's ability to develop their projects. The Applicant advised they will follow the Planning Inspectorate's Advice Note 17 on cumulative impact assessment.



The Inspectorate advised the Applicant to clearly explain all matters in the Consultation Report (CR) regarding land at Sizewell, especially with regard to whether some of this land has been secured for mitigation/ enhancement, and explain why the EDF and Mangox land is not available or appropriate for acquisition. Also, how engagement/ liaison with NG has been progressing. The Inspectorate emphasised the importance of the National Policy Statement (NPS) considering alternatives.

## **Landscape and visual impacts**

Regarding the reduction of the substation height the Inspectorate advised to consider any architectural principles and approach taken on other projects, for example the [Hinkley Point C Connection project](#) where the proposed substation is located on the edge of AONB. On this particular project the Examining Authority and the LAs were interested in not having standard grey metal. The Applicant was advised to refer to Policy and considering good design to help the substation with blending in and mitigating potential issues.

## **Consultation**

The Applicant stated that in January 2018 the LAs considered the western zones for the proposed substation as the best options to avoid impacts on AONB. However, following further consideration in March 2018 the LAs thought that the eastern zones would be more preferable. The reasons for this were uncertainty about the potential cable route and balance of public opinion. Cumulative impact is the remaining concern. Natural England's preferred options were also those in the west of the study area. In conclusion the Applicant considers that the West 1 (previously Zone 7) represents the most appropriate option to be taken forward.

The Applicant advised of the next steps which will involve informing the local authorities of the decision to choose W1 zone as preferable, followed by updating the statutory consultees in early May 2018. Presentations on W1 to the Parish Councils are scheduled for mid-May 2018. The Applicant's intention is to hold the LA and stakeholder workshop on substation and cable routing at end of May 2018, and more Public Information Days to inform public on development area towards the end of June 2018.

The Applicant also explained reasoning behind engaging with the technical stakeholders in smaller groups which allows focusing on technical matters. For example the Royal Society for the Protection of Birds (RSPB) and Wildlife Trust were engaged in the onshore ecology expert topic group. However, this does not mean presenting an agreed position to others but a more focused discussion. Parish Councils' input is considered as valuable and no less important.

The Inspectorate suggested that the Applicant may wish to highlight the ongoing engagement with the landowners, local Councillors and other stakeholders and how this relates to the statutory duties under s47 of the PA2008 preparing the Statement of Common Ground (SoCC) to get people engaged, and present the information in the final Consultation Report. The Applicant advised that they intend to publish an interim CR to show how the consultation comments and responses have been considered so far.



Additionally, videos explaining the DCO process and updated flowchart of two projects, including key consultation points, running in parallel will be available online.

In regards to establishing a contact plan during the pre-application stage the Inspectorate stated that it is not in a position to advise on matters such as whether a correct substation site has been chosen, or to revise and give a formal feedback/ review. Evidence Plans are usually set up around offshore issues. However, members of the Environmental Services Team are still available for Steering Group meetings. In response to the Applicant's query regarding the participation in tripartite meetings, the Inspectorate stated that it will be happy to set up a telecon with the LAs, or get involved if there is a particular reason/ issue to be discussed.

## **Habitats Regulations Assessment (HRA)**

The Inspectorate highlighted the recent judgment European court ruling C-323/17 - People Over Wind, Peter Sweetman v Coillte Teoranta (2018) which held that it is impermissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European Site (i.e. mitigation measures) at the screening stage. The Applicant confirmed that it would take the judgement into account and would be discussing with Natural England.

## **Specific decisions/ follow-up required**

The following actions were agreed:

- The Applicant will provide an updated timeline to agree meetings at the right stage of the pre-application process.
- The parties agreed to arrange the next telecon shortly.



# Meeting note

<b>Project name</b>	East Anglia ONE North (EA1N) and East Anglia TWO (EA2)
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	16 May 2018
<b>Meeting with</b>	Scottish Power Renewables (SPR)
<b>Venue</b>	TQH, Bristol (teleconference)
<b>Meeting objectives</b>	Projects update meeting
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 (s51) of the Planning Act 2008 (the PA2008). Any advice given under s51 would not constitute legal advice upon which applicants (or others) could rely.

## Welcome and introductions

The Applicant and the Inspectorate team introduced themselves and their respective roles.

## Project update

The Applicant provided an overall programme update, and confirmed that Scottish Power decided to progress both projects East Anglia ONE North and East Anglia TWO in parallel during the pre-application stage. Therefore the timescales for the statutory consultation under section 42 of the PA2008 are aligned and will be carried out in Q1 2019. The timescales are aligned from the impact assessment and cumulative impact assessment point of view and to assist with the stakeholder engagement.

The Applicant has given some consideration to submitting both projects at the same time, and discussed the matter with the Local Authorities (LAs) and key statutory bodies, including Marine Management Organisation (MMO), Historic England (HE) and Natural England (EN). The Inspectorate advised the Applicant to keep in mind the resourcing that will be required from Interested Parties (IPs), the LAs and other statutory parties, and potential difficulties during combined examination stage for parallel NSIPs. The Inspectorate stated that it regarded a gap between the two examinations as important if this was possible as it would allow IPs to fully participate in the two examinations. The Inspectorate would look to minimise resource intense clashes between the two projects for all participants in the process.





The Applicant intends to submit the Development Consent Order (DCO) application for EA2 in Q4 of 2019, and will update their projects pages imminently.

## **Transboundary screening**

The Inspectorate referred the Applicant to the updated [Advice Note Twelve: Transboundary Impacts and Process](#) and advised that the approach has been amended in response to comments from Espoo, in agreement with BEIS and other parent departments. The approach now includes for the issue of a press release to member states for the purposes of public engagement. The Inspectorate is currently awaiting further information from BEIS before the process is undertaken for EA1N and EA2; however, the initial stage of the process has been progressed. Based on the Applicant's Scoping Report we intend to consult with France, Germany, Belgium, Denmark, The Netherlands and Sweden. The Inspectorate will publish the screening and initiate consultation at the same time, and will notify the Applicant. Transboundary screening is an ongoing duty of Secretary of State and can be carried out anytime it is deemed appropriate (ie when new information becomes available), but as explained in Advice Note Twelve as a minimum the Inspectorate carries out a screening following scoping, and then following acceptance, if applicable.

## **Statement of Community Consultation (SoCC) and consultation**

The Applicant gave an overview of different consultation activities proposed, linked to the published SoCC. It will be communicating the revised programme to stakeholders, including publication of a booklet confirming the selection of W1 zone (renamed Zone 7) as the preferred site for the substations, and outlining all key works proposed for the site. The projects' websites will be updated with the new information and advice on how members of the public can engage during the process. Phase 3 Consultation began on Monday 14<sup>th</sup> May and will last until 28<sup>th</sup> August 2018 to allow sufficient time for the members of public and stakeholders to get involved, and to understand proposed mitigation to minimise impact on the landscape. The Applicant intends to hold Parish Council briefings, as well as the Public Information Days (PID) at the end June / beginning of July, followed by a repeat of these at the end of July, then allowing for all feedback forms to be returned. All information published on the East Anglia ONE North and East Anglia TWO websites will be made available also on the Inspectorate's website through the direct links.

In regards to the engagement with the local community the Applicant confirmed that it responds quickly and appropriately to many letters and emails received from the Parish Councils and members of the public. The Applicant also referred to the recent correspondence from the Local Authorities sent to Department for Business, Energy and Industrial Strategy (BEIS) and Ministry of Housing, Communities and Local Government (MHCLG), and copied to the Inspectorate, regarding the cumulative impacts of NSIPs on the Suffolk Coast. The Applicant will provide a response to the letter explaining their own position on key points, such as methodology of selecting a site and practical ways of managing potential impacts. The Inspectorate said that it also respond to the letter and would be happy to hold a meeting for all parties to discuss matters; however, it would need to consider logistics and location for such event. It also recommended following approach as advised in [Advice Note Seventeen: Cumulative effects assessment](#).



## **Evidence Plan Steering Group**

The Applicant confirmed that the last round of the meetings and discussions on topics such as mammals and ecology have been very positive. The Applicant intends to hold the next progress update conference call rather than the meeting to discuss matters.

## **Offshore and Onshore Area of Search**

The Applicant confirmed that it soon will be able to refine and reduce the development area boundary within the existing study area. The key driver for the change was looking at the reduction to bring the offshore boundary further south from EDF infrastructure.

In regard to the onshore area of search the Applicant confirmed that it has made a decision to consult on W1 zone as the selected site for the substation, and identify the area for the preferred landfall. The Applicant will be defining an indicative onshore development area which will then be consulted on. The Applicant is in discussions with the National Grid as some modification to the existing overhead lines is required and regarding further refinement of the search area which might extend as to what was assessed in the Scoping Report. However, the Applicant feels confident that it would not introduce any new receptors and so be aligned with the area assessed in the Scoping Report and Scoping Opinion.

The Applicant also referred to the matter raised at the meeting in January, in relation to some consultees that were missed from the Scoping consultation. The Inspectorate confirmed that the matter has been rectified, and no further responses have been received.

## **Specific decisions/ follow-up required**

The following actions were agreed:

- The parties agreed to arrange the next telecon regarding the parallel submission and joint examination of both projects for mid-June.
- Further update meeting on Evidence Plan Steering Group and section 42 consultation will be arranged in late August.



# Meeting note

<b>Project name</b>	East Anglia ONE North (EA1N) and East Anglia TWO (EA2)
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	20 June 2018
<b>Meeting with</b>	Scottish Power Renewables (SPR)
<b>Venue</b>	TQH, Bristol (teleconference)
<b>Meeting objectives</b>	Projects update meeting
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 (s51) of the Planning Act 2008 (the PA2008). Any advice given under s51 would not constitute legal advice upon which applicants (or others) could rely.

### Welcome and introductions

The Applicant and the Inspectorate team introduced themselves and their respective roles.

### Project update

The Applicant provided an update in regard to the Phase 3 Consultation for both projects which began on 14 May 2018 and will last until 28 August 2018 to allow sufficient time for the members of the public and stakeholders to be involved in the process. Three sets of Public Information Days (PIDs) are scheduled on Thursdays, Fridays and Saturdays. The dates are the 28<sup>th</sup>/ 29<sup>th</sup>/ 30<sup>th</sup> June, 5<sup>th</sup>/ 6<sup>th</sup>/ 7<sup>th</sup> July and 25<sup>th</sup>/ 26<sup>th</sup>/27<sup>th</sup> July. Consultation material for both projects being shown at PIDs will be available on the Applicant's website.

### Simultaneous DCO applications

The Applicant confirmed that they are intending to simultaneously submit separate Development Consent Order (DCO) applications in Q4 2019; one application for EA1N and a separate application for EA2. The Applicant requested advice to assist in understanding the procedures that would be available during the examination phase for both projects, including the possibility of holding joint hearings.

The Inspectorate advised the Applicant that it is possible to submit one application for two Nationally Significant Infrastructure Projects (NSIPs), as this has been done successfully in the past for other separate offshore wind farms; therefore the



Inspectorate advised that where possible, one application should be submitted for the two NSIPs. In such instances only one preliminary meeting would be required, and interested parties would only need to provide written responses for one application and attend one set of hearings (where required).

The Inspectorate advised that it is highly unlikely that the same Examining Authority (ExA) will be appointed to examine and report on both applications. Each application is examined in its own right, as a separate entity, and the ExA appointed to each application will only examine and report on the particulars of the application they are dealing with.

The Inspectorate advised that as a result of the above, it could be more challenging for interested parties to engage effectively in both applications if they are submitted separately and simultaneously. This would very likely result in two separate preliminary meetings and two separate sets of (potentially overlapping) deadlines for written submissions and two separate sets of (potentially overlapping) hearings on similar topics. Instead, examining the two projects within one application could lead to efficiencies in how the examination procedures (hearings and written submissions etc) could be handled by one ExA, and also enable interested parties to engage more effectively.

The Inspectorate advised that the Planning Act 2008 does not specifically prescribe for a process where the examination of two separate applications can be considered together; for the practical reasons outlined above joint examinations would be highly unlikely. It is for the ExA to decide how to examine the application and in making any decision about how the application is to be examined they must comply with the relevant provisions of the legislation.

The Applicant provided background to their decision to submit two separate applications at the same time, specifically the need for both projects to be separate and independent of one another to facilitate further funding and deliverability of the projects; and that both applications would be submitted by separate limited companies. Given the geographic overlap of the onshore works, as well as some of the offshore works, and the benefits in an improved understanding of cumulative impacts, the Applicant considers there to be potential advantages to an intensive yet combined process. The Applicant also advised that it was reviewing measures (such as the structure of the applications or provision of a 'signposting' document) in order to assist in stakeholders' efficient review of both documents.

The Applicant confirmed that it will be discussing this matter with the stakeholders. The Applicant advised that it will seek comments and input from the Local Authorities to update the Statement of Community Consultation (SoCC) to reflect the changed programme of statutory consultation and potential joint submission.

The Inspectorate requested that the Applicant provides information to justify their approach and explains the potential resource implications to the relevant consultees and potential interested parties. The Inspectorate also highlighted the potential resource implications on the Applicant in responding to separate ExA written questions, providing multiple written submissions and attending separate hearings. The Applicant acknowledged this.



**Specific decisions/ follow-up required**

The Applicant will provide further information and reasons for submitting the two projects along identical timelines.



# Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	5 September 2018
<b>Meeting with</b>	Local Authorities
<b>Venue</b>	Banksy, TQH, Bristol (teleconference)
<b>Meeting objectives</b>	Project update meeting
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

## Simultaneous DCO applications

The representatives from Suffolk Coastal and Waveney District Councils (SC&WDCs) and Suffolk County Council (SCC) expressed concerns regarding the proposed simultaneous submissions by ScottishPower Renewables of the Development Consent Order (DCO) applications for East Anglia ONE North (EA1N) and East Anglia TWO (EA2) in 2019, and the potential resource implications as a result of this for both Local Authorities (LAs), particularly as both LAs are expecting a DCO application for the new nuclear power station at Sizewell C to follow these proposals (different promotor).

The LAs also expressed concern regarding the potential cumulative impacts on the east Suffolk coast in the vicinity of Sizewell, as a result of existing and proposed energy infrastructure.

The LAs stated their intention to request that the appointed Examining Authorities (ExAs) consider the cumulative impacts of all existing and proposed projects. The Inspectorate stated that the ExA for each project will apply current best practice as described in [Advice Note 17: Cumulative Effects Assessment](#), which sets out the tiered approach to assessing cumulative impacts of projects.

The Planning Inspectorate explained that each application for a DCO is examined in its own right; the ExA will examine and report on the particulars of the application to which they are appointed. In this instance, this would likely result in separate preliminary meetings, hearings and written submissions.

However, should both applications be accepted for examination at the same time the Inspectorate would aim to (where possible) avoid clashes between certain events.



The LAs also stated their concern relating to ScottishPower Renewables' choice of location for the proposed substation, which they stated is also shared by many local residents.

## **Specific decisions/follow-up required?**

The LAs and the Inspectorate agreed to arrange a tripartite meeting with the Applicant.

The LAs will produce a list of comments they have in regard to the submission of simultaneous applications, for the Inspectorate and the Applicant to consider.

# Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	10 December 2018
<b>Meeting with</b>	ScottishPower Renewables
<b>Venue</b>	Teleconference
<b>Meeting objectives</b>	Project Update Meeting
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which Developer (or others) could rely.

## Project update

The Developer provided an update following the end of the Phase 3.5 consultation and explained it will take forward the Grove Wood, Friston substation site based on its views on what is most appropriate in terms of national policy, particularly in relation to the Area of Outstanding Natural Beauty located close to the Broom Covert, Sizewell site. The Developer stated it had issued press releases and informed local authorities (LAs) of this decision. The Developer's intention is to provide full justification of the site selection in the Preliminary Environmental Information Report (PEIR).

The Developer explained that the order limits overlap for both projects regarding the onshore works, and part of the offshore export cables. The Developer explained that while the order limits overlap, the projects will be capable of being constructed simultaneously or sequentially.

The Inspectorate advised that it had received and replied to some correspondence which will be published as s51 advice on the projects' pages.

## Consultation

Simultaneous Phase 4 statutory pre-application consultation is due to take place from 11 February to 26 March 2019 for both East Anglia TWO (EA2) and East Anglia ONE North (EA1N); this will include publication of PEIR. The two consultations (one for each project) will run in parallel. The Inspectorate asked how documents would be presented in a way which makes the similarities and differences between the projects clear. The Developer is proposing to issue a signposting document to help explain where matters are identical for both projects. This will be issued to certain Statutory Consultees but won't form part of the formal package of consultation documents. The Inspectorate queried why this



wouldn't be issued more widely. The Developer suggested it would use public information days to discover whether this would be useful to issue this document more widely.

## **Draft Documents**

The Developer stated it is intending to submit draft documents for both proposals, 6 months ahead of the application submission date. The Inspectorate advised that it does not undertake a line-by-line review of draft Development Consent Orders (DCOs), the Developer should provide a comprehensive draft Explanatory Memorandum (EM) and list any specific queries they have regarding the dDCO and to highlight any novel approaches they may be taking in the dDCOs, to assist the Inspectorate in reviewing the documents. The Inspectorate advised the Developer to review the recently updated Advice Note 15 Drafting Development Consent Orders.

## **Assessment approach**

The Developer explained their assessment approach which includes three scenarios:

- The impact of building one project alone;
- both being constructed simultaneously; and
- EA2 being constructed ahead of EA1N.

The Inspectorate queried whether this meant EA2 would always be built before EA1N.

The Developer confirmed that there was a commitment to construct EA2 first. The Developer explained that they have only screened Sizewell C into their onshore cumulative impact assessment at this stage. However, they have screened several other offshore wind farm projects into the offshore cumulative impact assessment. If more information about different projects becomes available then the Developer will screen these into future cumulative impact assessments.

## **Specific decisions/ follow-up required?**

The following actions were agreed:

- A face to face meeting to discuss the logistics of submitting two applications at the same time and how the documents will be structured.
- A further meeting may be required on this following consultation

# Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	25 February 2019
<b>Meeting with</b>	ScottishPower Renewables, East Suffolk Council and Suffolk County Council
<b>Venue</b>	
<b>Meeting objectives</b>	Project/Programme Update

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which Developers (or others) could rely.

### SPR Proposal and Programme

The Developer introduced the meeting and explained that it intends to submit the applications for both East Anglia ONE North and East Anglia TWO offshore wind farms at the same time.

The Developer explained that the proposed East Anglia TWO and East Anglia ONE North projects have been developed in parallel to ensure all stakeholders have a full and complete understanding of SPR's East Anglia development portfolio including cumulative impacts. The Developer explained that this "complete picture" has been requested by many stakeholders. Whilst the projects have been run in parallel, separate applications for both projects will be submitted in October 2019. Each project is its own commercial entity and separate companies have been set up to deliver each project. The Developer stated that it is important for it to maintain separation of the projects to ensure complete flexibility in the financing and delivery of each project. The Developer requested information on how the examination would be run given both projects would be submitting their applications at the same time. This query was raised to understand how stakeholder resources would be managed, and hence the Local Authorities were invited to be part of the discussion.

### The Inspectorate's response

The Inspectorate reiterated its initial advice that it is possible to submit one application for two Nationally Significant Infrastructure Projects (NSIPs), confirming that one Development Consent Order can grant consent for more than one NSIP. This would result in stakeholders only needing to engage in one examination for both NSIPs, this approach would therefore be the Inspectorate's strong preference. The Developer confirmed that it would not be taking this approach. The Local Authorities queried if submitting one application for two NSIPs would result in the Secretary of State only



being able to either grant consent for both projects or to refuse consent altogether. The Inspectorate explained that it is for the Secretary of State to decide which elements of a proposal can be consented (for example regarding the number of turbines) based on what has been applied for. **Post meeting note:** further advice can be provided on this matter if requested, for example regarding how such an application could allow for this.

A discussion was then held regarding the submission date of the applications. The Inspectorate advised that the greater the gap in submissions the better as this would ensure a sufficient gap would exist for only one examination to take place at a time. The Developer confirmed that they are not intending to have such a large gap, and that the applications would be made much closer together with only a maximum of a month apart, at most. The Inspectorate therefore advised that submitting the applications at the same time would be preferable to submitting the applications only weeks/one month apart, as this may enable the Inspectorate to try and arrange the examinations in such a way that minimises resource implications use for all parties involved.

The Local Authorities queried how the Inspectorate is likely to manage the process if the applications are submitted simultaneously and suggested that the preference is for the applications to be submitted together or have a longer gap due to duplication of effort for all parties involved. The Inspectorate advised that it is currently considering if the Planning Act 2008 and the secondary legislation could allow for certain members of an Examining Authority Panel to be appointed to both examinations, and if it would be possible in accordance with the legislation, for one hearing to examine a certain matter related to both proposals. However, the Inspectorate stressed that this approach has not been confirmed at this stage and that further work must be undertaken to ascertain whether the legislation would allow for it and also whether it is possible in practical terms.

The Inspectorate also advised that in accordance with the legislation, it is ultimately for the appointed Examining Authority to determine how the application to which they are appointed will be examined. Examining Authorities are appointed after submission of an application, once (and if) an application is accepted for examination. The Inspectorate advised that, even if it was found to be possible for a single hearing to examine identical/overlapping matters related to both applications, it currently considers that the written submissions would need to be submitted to the relevant project mailbox for the project to which they relate, and the Preliminary Meetings and other hearings would be held separately. The Inspectorate confirmed that it would aim for the deadlines for written submissions and the timing of hearings to be arranged in whatever way is most useful in reducing the resources required for all stakeholders, subject to the appointed Examining Authorities decision on how the relevant applications will be examined.

Noting the above, the Local Authorities confirmed that holding the Preliminary Meetings for both proposals on the same day (one after the other) would be their preference, as opposed to them being held on different days.

## **Areas of overlap between projects**

The Inspectorate asked about similarities between the onshore elements of the two projects. The Developer explained that the onshore order limits for each project's DCO will be identical (i.e. the onshore order limits for East Anglia TWO will be the same as the onshore order limits for East Anglia ONE North). The onshore infrastructure required for



either or both projects would be located within these order limits. The onshore infrastructure required for each project is the same. The location of construction consolidation sites will be the same for both projects within the order limits. The East Anglia TWO, East Anglia ONE North and National Grid Electricity Transmission substations are proposed to be co-located.

The Developer explained that the Environmental Impact Assessment assesses construction of the two projects under two scenarios in the cumulative assessment. These are concurrent construction or sequential construction. Where the sequential scenario is assessed an assumption is made that the East Anglia TWO project would be progressed first. The Local Authorities stated that the substation location for East Anglia TWO has slightly less visual landscape impact and queried whether if only one Development Consent Order is granted then would there be a possibility of ensuring that particular substation location is chosen. The Inspectorate advised that this would depend on whether the relevant application included this site within the application. The Local Authorities suggested that there could be a requirement in the Development Consent Orders for them to consent each exact substation location. The Inspectorate referred to its Advice Note 15 and the advice contained within it, in regard to tailpiece requirements (page 9 [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice\\_note\\_15\\_version\\_1.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2014/10/advice_note_15_version_1.pdf)). The Developer confirmed that their Preliminary Environmental Information Report concludes that there is no difference in the impacts between the two substation sites and therefore the DCOs would not seek to have this requirement.

## Cumulative impact

The Local Authorities asked what would be done to ensure that the examinations for East Anglia ONE North and East Anglia TWO take into account the other NSIPs located in the area at present or may potentially be in the future. The Developer explained that the extent to which these projects can be taken into the cumulative assessment for East Anglia ONE North and East Anglia TWO projects will follow the Planning Inspectorate's Advice note in this regard to ensure all relevant projects are screened into the assessment. The Developer explained that this exercise was undertaken for the assessments within the Preliminary Environmental Information Reports and will be updated, post s42, for the application. The Inspectorate advised that the Examining Authorities will examine the cumulative impacts and that it should be integral to the Environmental Impact Assessment that will be undertaken.

The Developer reiterated their commitment to an Environmental Impact Assessment which looks at cumulative impacts in a robust manner. They have regular meetings planned with EDF Energy and as more information about Sizewell C becomes available it will include it in their cumulative impact assessment. The Developer explained that it also meets regularly with National Grid Ventures to obtain updates on their project status. Furthermore, the Local Authorities lead the Energy Projects Working Together discussions where all parties meet, and which the Developer are part of.

# Meeting note

<b>Project name</b>	East Anglia Two and East Anglia One North
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	7 May 2019
<b>Meeting with</b>	ScottishPower Renewables
<b>Venue</b>	Rivergate, Bristol
<b>Meeting objectives</b>	Project / Programme Update
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

## Consultation Results

The Applicant provided an update on the projects, focusing on the results of the simultaneous statutory consultations which finished on the 26 March 2019. This update is detailed in the presentation that accompanies this meeting note (Annex A).

The Inspectorate advised, in relation to pre-construction trial trenching at key locations, the Applicant would need to consider how the draft Development Consent Order (dDCO) is worded so that the Written Scheme of Investigation in relation to archaeological works is potentially triggered prior to commencement. The Applicant explained that the onshore order limits have been kept wider at certain locations, informed by the completed geophysical surveys, to allow micro-siting of the onshore cable route to avoid potential buried archaeology as much as possible.

The Applicant explained that the Environmental Statement (ES) will clearly explain differences in both the Horizontal Directional Drilling (HDD) and open cut techniques for crossing through the Sandlings Special Protection Area (SPA). Where appropriate, differences in environmental impacts between the two techniques will be clearly presented. The Applicant explained that the HDD technique will require a wider cable route and additional HDD temporary working areas. The Inspectorate advised the Applicant to carefully consider how they will justify any compulsory acquisition in light of the two options proposed.

In response to the Applicant speaking about construction noise, the Inspectorate queried whether the working times set out covered start up and shut down times. The Applicant replied that the times presented in consultation covered the entire working time (including start up and shut down). The Inspectorate reminded the Applicant that the Environmental Statement (ES) must match the dDCO in this regard.

The Inspectorate advised the Applicant to consider how they will secure road signage for offsite highways works, particularly if they are relying on this for mitigation. The Applicant said this will be secured through the construction traffic management plan, which is secured through the relevant DCO Requirement. The Inspectorate queried what was meant by 'no landfall traffic through Thorpeness road'; the Applicant replied that this would mean no Heavy Goods Vehicles (HGVs) but smaller pre-construction traffic could use this road.

The Applicant received responses to the consultation in relation to traffic, including concerns about the cumulative impact with the Sizewell C New Nuclear Power Station, a project also in the pre-application stage of the Planning Act 2008 application process. The Inspectorate asked whether the three projects are using the same baseline data for their cumulative assessments. The Applicant answered that it was using the same strategic traffic models; however, at present it was going to use what is already in the area as the baseline traffic data then assess the impacts of EA1N and EA2, plus Sizewell C.

### **Joint submission**

The Applicant confirmed that it remains its intention to submit both applications simultaneously. The Inspectorate asked for further clarity on the reasons for the two Nationally Significant Infrastructure Projects (NSIPs) being applied for with separate DCO applications.

The Applicant explained that the projects were separate for commercial reasons.

### **Additional NSIPs**

The Applicant said that due to the extent of the realignment of overhead lines connecting to the National Grid substation as part of these proposals, the proposed electric lines might be considered an NSIP in their own right. The Inspectorate advised the Applicant to consider if their statutory consultation and publicity included sufficient description and information to satisfy the legislative requirements for the potential additional NSIP.

### **AOB**

The Applicant noted that it will provide standalone signed funding statements with the applications and they will retain liability for the substations.

### **Specific decisions/ follow-up required?**

The following actions were agreed:

- A meeting to be arranged to further discuss the Applicant's reasons for submitting two separate DCO applications.

# Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	21 May 2019
<b>Meeting with</b>	ScottishPower Renewables
<b>Venue</b>	Temple Quay House
<b>Meeting objectives</b>	Programme update
<b>Circulation</b>	All attendees

## Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

### *The Inspectorate's previous advice*

The Inspectorate reiterated its previous advice that, it is possible to submit one application for a single Development Consent Order (DCO) which contains multiple Nationally Significant Infrastructure Projects (NSIPs), i.e. one application can be submitted which applies for consent for the East Anglia TWO (EA2) and East Anglia ONE North (EA1N) proposals within one DCO. The Inspectorate noted that one of the key reasons as to why this advice was given, was to reduce the potential resource implications on the key stakeholders, by only needing to engage in one examination process, as opposed to engaging in two separate examinations running simultaneously. In addition, there are some constraints within the PA2008 regarding the extent to which two separate examinations could potentially be fully integrated.

The Inspectorate advised the Applicant that it would be possible to go through the Contacts for Difference (CfD) process with a single DCO for two NSIPs.

### *The Applicant's reasons for separate DCO applications*

The Applicant explained why it would be submitting the two projects as separate applications. Through its experience with East Anglia ONE (EA1) it said it had gained a greater understanding of the CfD auctions, which in its view were getting more competitive. Therefore, the Applicant considers that having the projects as two separate entities reduces the risk for them in this process. The Applicant also mentioned that by submitting two separate applications they felt it reduced the difficulty in divesting aspects of each project.

## ***The Inspectorate's considerations***

The Inspectorate noted that the Applicant will continue with their proposal to submit two separate and simultaneous applications for both of the above proposals. As a result, the Inspectorate said it had given further thought to how any examinations of the applications (if they were both to be accepted for examination) could be held in a way which, where possible, reduces the resource implications on Interested Parties when dealing with two simultaneous examinations.

The Inspectorate reiterated that the following considerations are not a confirmed approach - a decision on the person or persons (and number of persons) constituting an Examining Authority cannot be made until after an application has been accepted for examination. It is for any appointed Examining Authority to determine how an examination will be held, and the Inspectorate said it was still looking into the potential implications of the following possible approach.

The Inspectorate highlighted that in this particular instance, where the same Applicant is proposing to submit two separate applications for each proposal, with identical application submission dates, and where certain parts of the order limits will be identical - the Inspectorate said it was considering the possibility of appointing the same persons to the two Examining Authorities. For example, considering if the same (for example, five) persons could be appointed to examine both applications.

The Inspectorate said that in this scenario, it was considering the potential that the appointed Examining Authorities may consider holding some hearings which consider both applications/draft DCOs (dDCOs) (regarding the aspects of the proposals where the order limits are identical, for example the onshore cable route corridor). It said it still considered that: two separate Preliminary Meetings would be required; separate hearings for the examination of each application/dDCO are likely to be required, for example where the order limits are not the same; and any Interested Party wishing to comment on both applications would need to submit any written submissions to both project email addresses separately (or send two separate hard copies by post). Persons wishing to become Interested Parties for each application would also be required to make a separate relevant representation for each application.

The Inspectorate advised the Applicant that in order for this potential approach to have the best chance of succeeding in an efficient manner within the 6 month statutory timeframe for both dDCO examinations, clear and detailed information outlining the similarities and differences between the two Proposed Developments and the two suites of application documents would be extremely helpful to all involved, as part of each application submission.

## ***Further discussion***

The Applicant said it felt this approach was practical for it and other stakeholders. The Inspectorate asked about ways in which the Applicant might present information about the similarities and differences of each Proposed Development within each application; for example, documents explaining the differences/similarities between each application document etc. The Applicant agreed to consider how to best achieve this, prior to



submission, the Inspectorate stated that it would be able to provide section 51 advice on their proposed approach to this.

The Inspectorate then queried when the Applicant aimed to refine the multiple offshore cable routing options for EA2. The Applicant replied that its aim was for a DCO to grant consent for multiple options, whilst allowing the Applicant to develop only one of them.

The Inspectorate asked whether work numbers on the Works Plans and Schedule 1 of each DCO for each project would be aligned, as this might assist understanding. The Applicant replied that this was being considered.

The Inspectorate advised the Applicant to consider how the dDCOs would be drafted in relation to the Compulsory Acquisition of the same 70 metre strip of land for the onshore cabling. It also suggested that the dDCOs include provisions in which the Applicant notifies the relevant planning authority which DCO the cable work it is conducting, is for.

### ***Specific decisions/ follow-up required?***

The following actions were agreed:

- The Applicant to provide a list of queries and novel approaches within the draft DCO for EA2, to assist the Inspectorate's review of the draft DCO ahead of submission.



## Meeting note

<b>Project name</b>	East Anglia ONE North and East Anglia TWO
<b>File reference</b>	EN010077 and EN010078
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	16 July 2019
<b>Meeting with</b>	Scottish Power
<b>Venue</b>	Rivergate, Temple Quay, Bristol
<b>Meeting objectives</b>	Project update meeting and review of draft documents
<b>Circulation</b>	All attendees

## **Summary of key points discussed and advice given**

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

### **Project update**

The Applicant provided a project update including their proposed submission date of 25 October 2019. Should the application be accepted for examination, and subject to any section 51 advice which may be issued by the Inspectorate, the Applicant intends to issue the section 56 notification to open the relevant representations on 23 November 2019, for both projects.

When discussing potential timeframes post-submission, the Inspectorate advised that there is no statutory timeframe for the pre-examination stage, and that the Government guidance<sup>1</sup> notes this point, and only expects that the preliminary meeting could be held between six weeks and two months from the end of the relevant representation deadline. The Inspectorate advised the Applicant that the pre-examination period may take longer than the anticipated time periods set out in the above guidance due to the scale of both projects, and also taking into account the Christmas period.

The Applicant confirmed they will seek flexibility in the draft DCOs on the precise locations of the onshore substations required for both projects. The Inspectorate advised the Applicant that where options are being considered for either project, to ensure that the corresponding Environmental Statement presents an assessment of the worst-case scenario in each technical assessment undertaken.

### **East Anglia TWO Draft documents**

The Inspectorate reviewed the following draft documents for the East Anglia TWO (EA2) project only, provided to the Inspectorate in May 2019.

- Habitats Regulation Assessment
- Consents and Licences under other legislation
- Consultation Report
- Section 42 consultee list
- Land plans
- Works plans
- Statement of Reasons
- Extract of Book of Reference and Rights Sought
- Draft Development Consent Order
- Explanatory Memorandum
- Interface document

A brief discussion of the Inspectorate's comments on the draft documents was held. Detailed comments are provided in the Table below. The Inspectorate confirmed that the

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<sup>1</sup> Guidance for the examination of applications for development consent, March 2015

advice provided relates only to the EA2 proposal, as no draft documents were received in regard to East Anglia ONE North (EA1N). A letter was issued to the Inspectorate by the Applicant detailing the differences and similarities between the EA2 and EA1N proposals.

### **Interface Document**

The Inspectorate confirmed that it has no further comments to make on the precise layout or formatting of the interface documents and consider that these will be for the Applicant to decide, although it would be advisable to take comment from key stakeholders. The Inspectorate confirmed the understanding that a copy of the documents would be submitted within the application for both EA1N and EA2. The 'Guide to the Application' for each application should clearly show how the interfacing documents sit within the application and relates to the rest of the submissions.

A general but important comment the Inspectorate made is that the usefulness and purpose of the document must always be forefront. In some cases there may be few differences/similarities between the projects (e.g. onshore project description may involve few differences but offshore environmental data may contain few similarities) and the Applicant should consider the usefulness of the interfacing document – that if it itself is becoming very long and technical, requiring a lot of cross-referencing to different parts of the application, the Inspectorate would suggest its usefulness had become compromised.

In summary, the Inspectorate advised that the interfacing document approach may work well and be helpful to stakeholders for some parts of the application but not others, and careful consideration should be given to the extent of use of this approach.

### **Specific decisions/ follow-up required?**

The following actions were agreed:

- The Inspectorate and the Applicant will continue to hold monthly conference calls until the submission of the applications.
- The Inspectorate to provide written comments on draft application documents to the Applicant.

## The Proposed East Anglia Two Offshore Wind Farm

### Section 51 Advice – draft Application Documents provided by Scottish Power Renewables for the Inspectorate’s review

This advice relates solely to matters raised upon the Inspectorate’s review of the draft application documents submitted by Scottish Power Renewables (“the Applicant”), and not the merits of the proposal. The advice is limited by the time available for consideration, and raised without prejudice to the acceptance or otherwise of the eventual application. It is provided to assist the preparation of the next iteration.

#### **Abbreviations used**

**PA2008** *Planning Act 2008*

**BoR** *Book of Reference*

**dDCO** *draft Development Consent Order*

**EM** *Explanatory Memorandum*

**ExA** *Examining Authority*

**SoS** *Secretary of State*

**The Inspectorate** *Planning Inspectorate*

**SoR** *Statement of Reasons*

#### **General Drafting points**

1. The Applicant should ensure that when the draft development consent order (dDCO) is finalised (ahead of submission) all internal references and legal footnotes are checked and that the drafting follows best practice in Advice Note (AN) 13 and 15 and any guidance on statutory instrument drafting.
2. A thorough justification should be provided in the Explanatory Memorandum (EM) for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/ or controversy in relation to the inclusion of that particular power.
3. Notwithstanding that drafting precedent has been set by previous DCOs, whether or not a particular provision in this DCO application is appropriate will be for the Examining Authority (ExA) to consider and examine taking account of the facts of this particular DCO application and having regard to any views expressed by the relevant authorities and interested parties.

**Extract from s51 Advice – July 2019**

2.	3.2	<i>'The typical 32m working width would be widened if a trenchless technique is utilised to cross the Leiston – Aldeburgh SSSI and Sandlings SPA. The working width would also be widened to cross the Hundred River'.</i>	It doesn't state here, the extent to which the typical working width will be widened (for example this is mentioned in para 6.92 as 90m).
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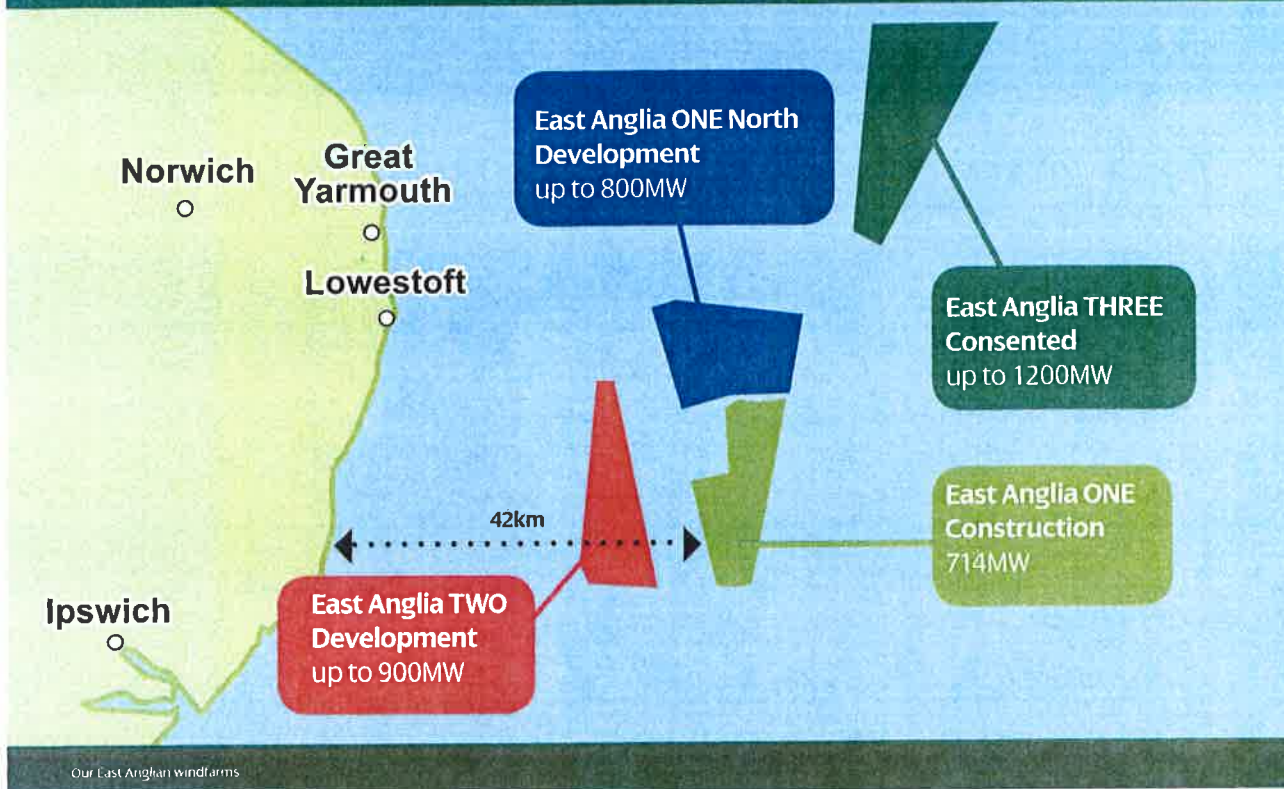
28.	Chapter 12	<i>Interaction with East Anglia One North</i>	It might assist the reader if this chapter was presented earlier in the document, to provide context to the request for a 70m swathe and to introduce the possibility that the works for both projects may be undertaken simultaneously or sequentially.
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## **Annex 2**

**Article from SPR's 'East Angle'  
Newsletter  
Winter 2017/18**

# East Anglia TWO & East Anglia ONE North update

Winter 2017/18  
spreastanglia.co.uk



East Anglia TWO and East Anglia ONE North are the third and fourth offshore windfarms we are planning to develop off the coast of East Anglia and we hope to commence construction for the windfarms around 2024/2025.

While East Anglia ONE and East Anglia THREE are proposed to connect to the existing National Grid substation at Bramford, we are exploring an alternative coastal connection point with National Grid for East Anglia ONE North and East Anglia TWO.

It is anticipated these projects will connect to the grid in the vicinity of Sizewell and Leiston. The exact position of connection is yet to be determined, but we are mindful that a coastal location minimises the infrastructure needed and, as such, the onshore impacts.

The potential cable route areas and methods of connection are being refined and consultation is underway with local agencies regarding possible constraints.

It is likely that each project would require an onshore substation, to which power from the offshore windfarm would flow via

underground cables. An underground circuit would then provide connection to the existing National Grid infrastructure with details of final works to be determined.

A connection near Sizewell should not require any new overhead transmission lines and would not affect proposed nuclear power station Sizewell C's planned export capacity.

In order to further minimise onshore construction impacts, similar to our East Anglia ONE and East Anglia THREE projects, we are proposing to install ducting for East Anglia ONE North during construction of East Anglia TWO where the routing is the same.

### What happens next?

We will work with National Grid and others to further develop our plans.

In November 2017 the projects will move into the Environmental Impact Assessment scoping phase. During this process we seek to quantify the scope of the environmental assessment with The Planning Inspectorate and other consultees.

In 2018 we will finalise our proposals for East Anglia TWO. Building on our 2017 engagement, we will communicate in detail what is proposed and what the anticipated environmental impacts are through the publication and consultation of a draft Environmental Statement. East Anglia ONE North will follow.

Public Information Days and briefings will be held throughout the process.

### Contact us

If you have a query regarding East Anglia ONE, please contact Ed Rees or Nikki Berry. For queries relating to the other East Anglia projects, please contact Joanna Young at [jyoung@scottishpower.com](mailto:jyoung@scottishpower.com)

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**SCOTTISHPOWER  
RENEWABLES**

If you would like to find out more about our work in the East Anglia area, please visit: [spreastanglia.com](http://spreastanglia.com)  
ScottishPower Renewables, Room 101,  
OrbisEnergy, Wilde Street, Lowestoft, Suffolk, NR32 1XH

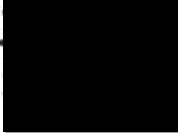


## **Annex 3**

**Letter from SPR to Mr & Mrs Fincham  
21 May 2018**



Mr. and Ms. Fincham



ScottishPower Renewables  
 East Anglia TWO  
 RTLY-RLGH-GKSE  
 FREEPOST  
 25 Priestgate  
 Peterborough  
 PE1 1JL

21 May 2018

**Re: East Anglia ONE North and TWO projects: Concerns and objections**

Dear Mr and Ms Fincham,

1. We wish to record our serious concerns at the proposal to site a Substation at Sites 6-7 and of these the proposal for site 7 seems the most illogical and disruptive of local amenities. Our concerns are set out below together with some questions that we would like urgently answered.
2. Generally, we are very concerned at the lack of any real details. The documents on the SPR website are exceedingly vague and this makes realistic comments very difficult.

Thank you for your letter dated 3<sup>rd</sup> April 2018, stating your concerns regarding the East Anglia TWO and East Anglia ONE North projects. ScottishPower Renewables greatly appreciates the time you have taken to share your thoughts and recommendations.

We have noted your concerns regarding the level of information provided to date and the lack of notification to residents in Friston. We will add your mailing address and email address to our database for issuing any project updates and correspondence, including inviting you to our upcoming Public Information Days in the summer. From your correspondence, it is apparent that there are a number of key areas of concern that have been addressed in the paragraphs below.

**Update on progress on East Anglia TWO and East Anglia ONE North projects**

To date, ScottishPower Renewables has consulted extensively with the Local Planning Authorities, statutory consultees and members of the public, and has undertaken specialist studies to further understand the environmental sensitivities of the local area.

The outcomes of the consultation and specialist studies have subsequently informed ScottishPower Renewables' onshore site selection process. ScottishPower Renewables has selected a preferred substation zone based on a range of factors, using the advice of our industry leading legal advisors who draw on National Planning Guidance, and our industry leading technical advisors, in addition to our own significant project experience. This advice is then considered in the context of the comments and consultation feedback of both statutory and non-statutory consultees, the public and potentially affected parties.

Following the conclusion of this consultation process, ScottishPower Renewables has prepared a document outlining the approach to site selection. The document includes the work ScottishPower Renewables' expert advisors have undertaken to inform site selection and also states how decisions are made and, ultimately, the preferred substation zone that has been selected for the location of the two substations (one each for East Anglia TWO and ONE North) and one National Grid Energy Transmission Substation.

ScottishPower Renewables (UK) Limited, 320 St Vincent Street, Glasgow, G2 5AD

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Please visit the link below to view the Summary and Approach to Site Selection document:

[https://www.scottishpowerrenewables.com/userfiles/file/summary\\_and\\_approach\\_to\\_site\\_selection.pdf?v=3](https://www.scottishpowerrenewables.com/userfiles/file/summary_and_approach_to_site_selection.pdf?v=3)

### **Consultation**

3. However, SPR has not taken any steps to ensure that the properties most directly affected were notified of these proposals. The inhabitants of Friston (which is immediately adjacent to sites 6 and 7) found out about the proposal only by chance. The Parish Council leafleted the inhabitants informing the residents of the proposal. This was on 1st April. Before then virtually no one was aware of the plan. A concerned resident passed on the leaflet to us yesterday, 2nd April. Had this not occurred we would have been unaware of the proposal, even though we are located within a hundred metres of Site 7. This is an appalling way in which to treat those most likely to be affected by the proposal. We can only assume that this is reflective of SPR's general strategy towards consultation of the local affected community.
4. **Please respond by providing the full details of the steps which SPR has taken to ensure that all affected persons are notified properly and in advance.**
5. **Please also provide an explanation why we were not notified and an assurance that all future information will be sent directly to us at the address below and to our email address.**

ScottishPower Renewables has consulted with individuals and communities living within the vicinity of the land affected by the Development Consent Order (DCO) application, or who have taken an interest in East Anglia ONE North and/or East Anglia TWO. The geographic areas of engagement have been influenced by three factors:

1. The onshore consultation zone for offshore impacts – determined by the defining Zone of Theoretical Visibility (ZTV). Refer to Figures 1 and 2 below - please note that Friston is located outside the Zone of Theoretical Visibility for East Anglia ONE North.

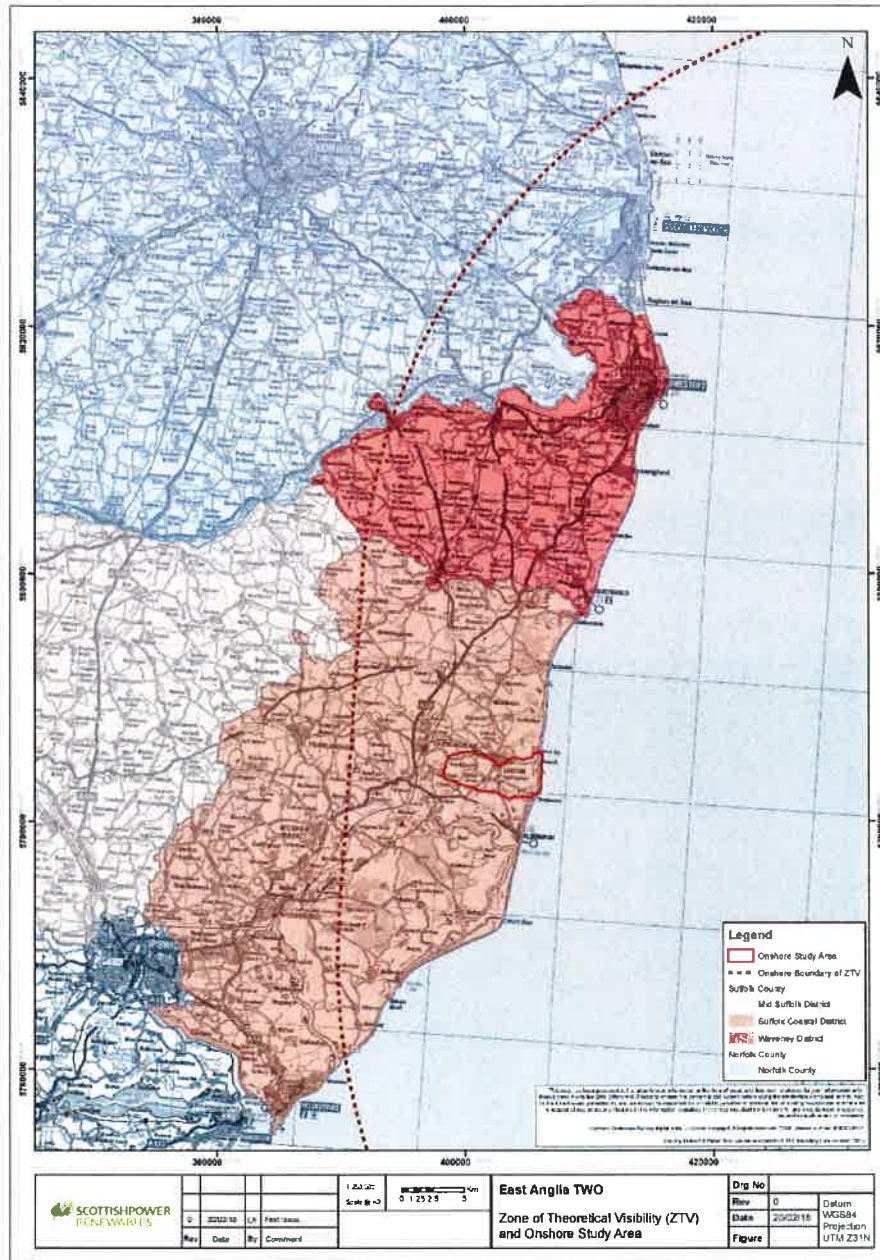


Figure 1 Onshore Consultation Zone for Offshore Impacts of East Anglia TWO

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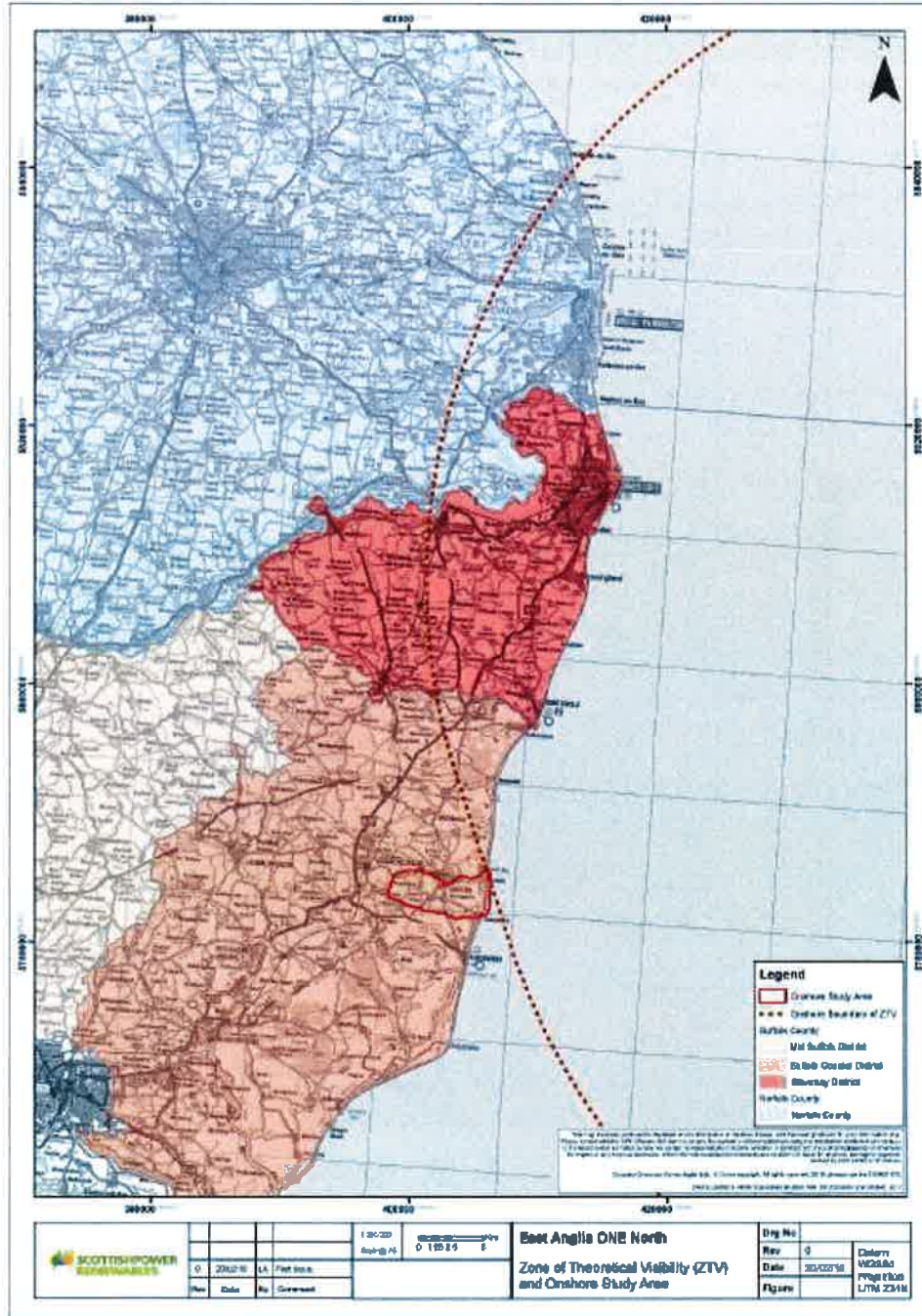


Figure 2 Onshore Consultation Zone for Offshore Impacts of East Anglia ONE North

2. The onshore study area (Figure 3) – the area within which onshore infrastructure for East Anglia ONE North and/or East Anglia TWO would be placed.

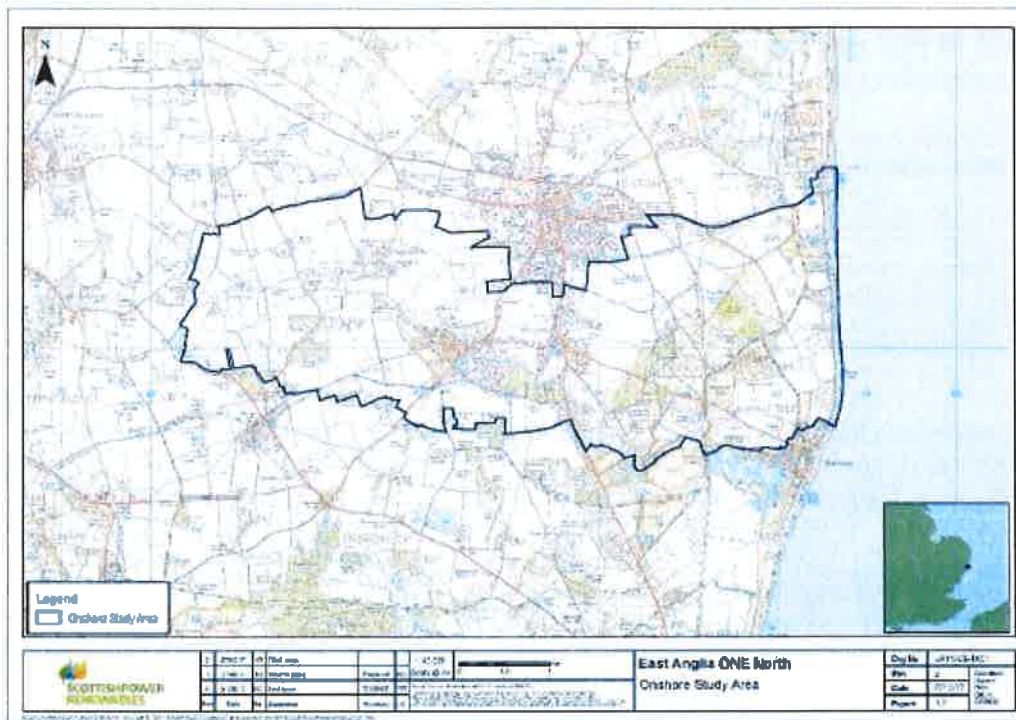


Figure 3 Onshore Study Area

3. The offshore consultation zone (Figure 4) – the area within which offshore infrastructure would be placed.

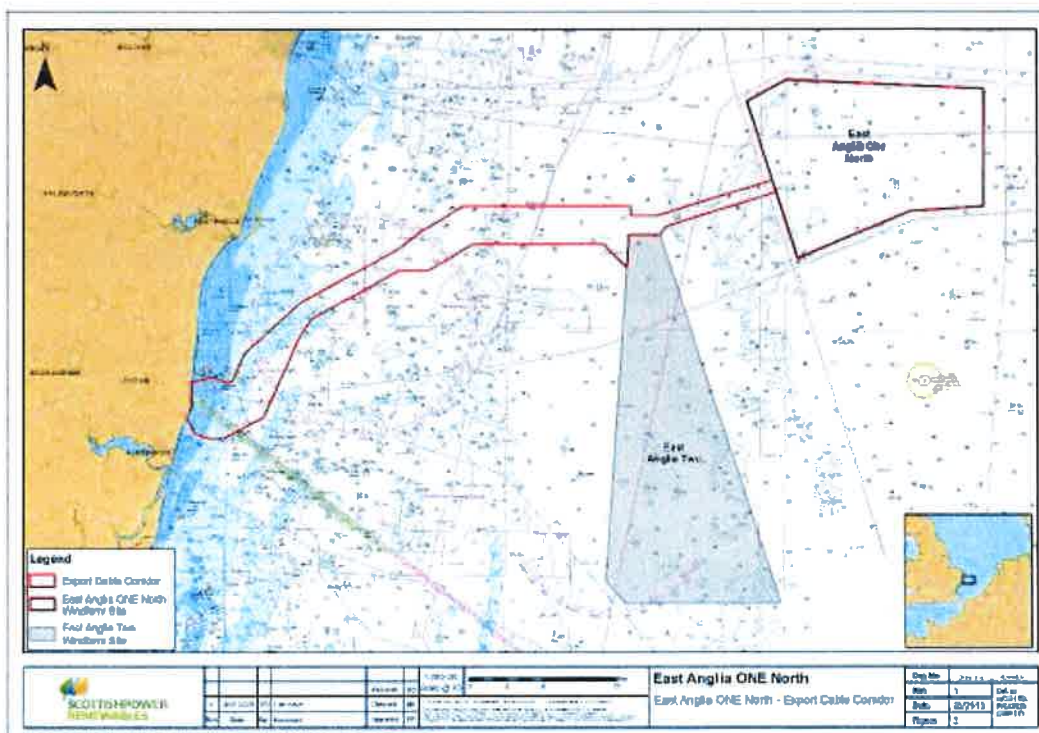


Figure 4 Offshore Consultation Zone

3(v1)

Consultation has included Parish and Town Councils, areas committees, community groups, organisations representing the local business communities and tourist boards. ScottishPower Renewables has sought input from the Local Planning Authority to identify these.

As well as community consultation, ScottishPower Renewables has discussed the East Anglia ONE North and East Anglia TWO projects with a range of statutory and non-statutory consultees, including:

- Local authorities
- Owners, tenants, and occupiers of the land affected by the DCO application
- Commercial stakeholders (including landowners and the fishing industry via ScottishPower Renewables' Commercial Fisheries Working Group)
- Environmental bodies

You will appreciate that the onshore study area allows for many potential substation locations. ScottishPower Renewables narrowed down the potential locations into the seven zones that were displayed at the March Public Information Days and announced their decision on site selection in mid-May 2018.

The consultation process has been split into five stages:

#### ***Phase 1. Consultation***

The aim of this consultation was:

- To introduce East Anglia ONE North and East Anglia TWO to new stakeholders;
- To consult on potential constraints to the locations for onshore infrastructure;
- To explain the Environmental Impact Assessment Scoping process; and
- To introduce the projects to those potentially impacted by the visual impacts of the offshore windfarm.

This was completed using the following tools:

Telephone calls, briefings, meetings, and sharing a leaflet with a wide range of statutory and non-statutory stakeholders: County, Borough, District, Town, Parish Council, Visit East Anglia and New Anglia Local Enterprise partnership.

Public Information Days were held on 30<sup>th</sup> and 31<sup>st</sup> October and 1<sup>st</sup> and 2<sup>nd</sup> November 2017. These were advertised in a number of ways. Quarter page adverts were placed in the East Anglian Daily Times for two weeks and in the Lowestoft Journal for two weeks.

Posters advertising the Public Information Days were sent to the following town and parish councils:

Southwold Town Council  
Lowestoft Town Council  
Walberswick Parish Council  
Aldeburgh Town Council  
Orford Town Council  
Aldringham cum Thorpe Parish Council  
Leiston Town Council  
Knodishall Parish Council  
Kessingland Parish Council

Additionally, a number of local businesses located in the Zone of Theoretical Visibility displayed posters advertising the Public Information Days in the lead up to the event.

We met with Friston Parish Council in early March to discuss East Anglia ONE North and East Anglia TWO in detail with them. This was part of our informal consultation phase.

### **Phase 2. Consultation**

Phase 2 marked the start of our statutory consultation. Public Information Days were held on 17th and 18th March and 24th and 25th March 2018.

The March 2018 Public Information Days were designed to specifically provide further information on the Onshore Study Area within which ScottishPower Renewables intends to site the projects' onshore electrical infrastructure, the refinement of the study area and also to seek opinions on the viewpoints selected to assess the visual impact of the offshore wind turbines.

The March 2018 Public Information Days were advertised in the East Anglia Daily Times and the Lowestoft Journal. ScottishPower Renewables provided flyers to Aldringham-cum-Thorpe Parish Council and Knodishall Parish Council for them to promote the events. Posters were also displayed across the Zone of Theoretical Visibility and the onshore study area (*Figure 3*).

An email was sent to Friston Parish Council on 5<sup>th</sup> February 2018 requesting a meeting with the Parish Council before the March 2018 Public Information Days. Friston Parish Council were not contacted directly as part of Phase 1 (informal consultation) due to the onshore study area not having been identified and defined at this stage.

ScottishPower Renewables has been collated and analysed all feedback received from the Phase 2 Public Information Days. During Phase 2 of the consultation we also have received correspondence from Friston Parish Council which has been noted and recorded.

### **Phase 3. Consultation**

The third phase of the Public Information Days will be undertaken in summer 2018. These Public Information Days will specifically be designed to show the refined development area for onshore infrastructure and provide an update on the proposed development plans. Parish council briefings will be ongoing during this stage.

The summer 2018 Public information Days will be advertised in the same papers as above and a letter drop will be undertaken within the affected geographical areas.

### **Phase 4. Consultation**

Phase 4 Public Information Days will be used to provide an update on both the progress and plans for East Anglia ONE North and East Anglia TWO. This will coincide with section 42 of the Planning Act 2008 (consultation with statutory consultees such as local authorities).

### **Phase 5. Consultation**

The fifth stage will be when ScottishPower Renewables will consult on the proposed DCO application pursuant to section 43 of the Planning Act 2008.

In addition to the Public Information Days outlined above, through all phases of the consultation ScottishPower Renewables will provide updates on their website, via social media channels, as well as on our entire portfolio of East Anglia projects via the publishing of our biannual newsletter, the East Angle.

For further details on ScottishPower Renewables' consultation with local communities on the proposed offshore windfarm project, as required under the Planning Act 2008, please refer to our website [https://www.scottishpowerrenewables.com/userfiles/file/EA1N\\_SoCC.pdf](https://www.scottishpowerrenewables.com/userfiles/file/EA1N_SoCC.pdf).



3(viii)

6. **Because of SPR's failure to notify us we reserve all of our rights to supplement our views and comments. This includes the right to seek adequate answers using Freedom of Information Act powers**
7. The observations that we make now below are therefore not in any way based upon an ability to have studied the documents we have now seen in any detail.
8. First, the obvious location is at the Sizewell plant itself or in its immediate vicinity, which would eradicate the harm otherwise to be caused to inland areas and their amenity. Given that this is the obvious location for the power plant there is no explanation as to why the Sizewell plant has been excluded. The consultation documents are deafening in their silence on this point.
9. But if the site is to be inland it should be as close to the coast (and to the Sizewell plant) as possible to minimise inland disruption. Sites 6 and 7 are furthest away from the coast and from the Sizewell plant. The sites which would be least disruptive on this score would be Sites 2 and 3. Given the 50m wide trough or channel that is being planned the damage to landscape, hedgerows and wildlife etc would be incalculable. Sites 6 and 7 are very close to large wooded areas where there is a large amount of native wildlife including owls. The further inland that the sites are located the greater the harm to wildlife and amenity.
10. **Please provide full information setting out whether the Sizewell site has been considered and if so why it is not now identified as a possibility. Explain why the land surrounding the Sizewell plant is not being included in the search area.**

#### **Sizewell locations**

ScottishPower Renewables has noted your comment that the onshore substations should be situated as close as practicable to the coast and existing National Grid pylons. Allow me to give some further information regarding the decision not to site the substations near Sizewell.

The Sizewell brownfield sites and the agricultural land near Sizewell have been considered as substation locations. They have been assessed as not viable for a number of reasons.

Part of the Sizewell land is owned by EDF, who have been consulted during the development of our onshore study area. EDF have serious concerns about any attempt to locate further substations within this area. These concerns are not only based on the lack of available land which is not already used or identified for mitigation, but also based on risks to the operational safety of the nuclear interest resulting from further works within the EDF landholding.

Another part of the Sizewell land is owned by the Nuclear Decommissioning Authority and leased to Magnox Limited, who are tasked with the decommissioning of the Sizewell A site. There are complex nuclear decommissioning works ongoing at the site that make it unsuitable for substation construction, operation or maintenance activities. It is also unlikely that the Magnox site is in itself large enough to accommodate the substations without the use of EDF's land.

11. **Please provide full details of where and how the 50m wider trough would be located for each of the seven sites identified. Please provide any maps that SPR possesses which show the prosed routes.**

#### **Cable route**

At this stage the cable route has not yet been determined and thus I will not be able to inform you on the specific details that you have requested at this stage. However, the Indicative Onshore Development Area to be consulted on during Phase 3 consultation can be viewed on the ScottishPower Renewables

website via this link:

[https://www.scottishpowerrenewables.com/userfiles/file/EA1N\\_EA2\\_IndicativeCableRouteSearc\\_Area.pdf](https://www.scottishpowerrenewables.com/userfiles/file/EA1N_EA2_IndicativeCableRouteSearc_Area.pdf)

ScottishPower Renewables will aim to select a route which causes the least disturbance to local residents and the natural environment. ScottishPower Renewables is committed to undergrounding the cables, with the benefit of avoiding landscape and visual impacts associated with overhead lines, and returning the cable route, where possible, to the condition and use prior to construction. This means backfilling any excavations and re-planting, agreed in consultation with landowners. Typical land uses in the development area include arable farming and grazing as well as recreation. The cable route can pass underneath roads and rivers with no permanent impact. Restrictions to land use along the cable route once installed include construction of housing or other such developments and woodland planting.

Further information on the Indicative Onshore Development Area, within which a cable route would be routed, will be available at the Public Information Days scheduled in summer 2018.

Furthermore, ScottishPower Renewables is committed to exploring synergies between the proposed East Anglia TWO and East Anglia ONE North projects in the same manner as for East Anglia ONE and East Anglia THREE by proposing where possible, and subject to regulatory certainty, to install ducting for the East Anglia ONE North windfarm onshore electrical cables during the East Anglia TWO windfarm construction. This would reduce the construction impacts for the proposed East Anglia ONE North project.

12. Second, in the SPR materials it is suggested that the local planning authority has already indicated a policy preference for the sites to be located inland and further away from the Coast. Our inquiries (which due to the failure to notify have had to be brief) and our contacts with the local authority have not identified any such preference ever having been given. Indeed, the contacts that we have been able to make in the very small amount of time available indicate that the policy of the Council is the opposite.

13. **Please therefore provide immediately full details of the policy indications said to be provided to SPR by the local authority and provide all documents which SPR relied upon in making this statement. Please provide the name and contact details of the individuals who are said to have provided this indication.**

The ScottishPower Renewables materials do not suggest that the local planning authority have indicated a policy preference for the sites to be located inland and further away from the coast. The local planning authority asked ScottishPower Renewables to investigate sites to the west of the Aldeburgh Road, but did not indicate a preference for ScottishPower Renewables to locate there. We cannot comment on any preference the local planning authority might have.

ScottishPower Renewables has stated that national planning policy (NPS-EN1) supports locations to the west as these do not have an impact on the Suffolk Coast & Heaths AONB and planning policy is clear in that projects should avoid siting in the AONB and not have impacts on the AONB.

ScottishPower Renewables has produced a Substation Location Options Review (Landscape and Visual) which focused on the potential capacity for siting the substations near the coast. This found that during site selection ScottishPower Renewables has a duty to have regard to the AONB designation, its nationally protected landscape status and if possible, avoid or minimise significant effects on its 'special qualities'. The project would need to demonstrate 'exceptional circumstances' and 'public interest' if the substations are to be sited within the AONB.

ScottishPower Renewables cannot comment on the local planning authority's position on this.

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14. Third for SPR to develop Sites 6 and 7 would necessitate a huge amount of disruption to Friston and the surrounding area. The road running through Friston (the B1121) is a main road connecting Aldeburgh and Saxmundham. It is single carriageway and the increase in traffic would have a huge and negative impact upon Friston village. To access the proposed site from the B1121 would then require accessing Grove road which has residential properties on both sides and is very narrow. The disruption to those on Grove Road would be vast and indeed it is hard to envisage how heavy machinery could gain access to the site via Grove Road at all, but certainly not safely.
15. **Please provide all details of how SPR would propose to obtain access to the proposed site and what powers SPR would seek to use in order to achieve its objective. Please confirm whether SPR intends to use any compulsory purchase powers and if so which ones. Please provide copies of all working papers which SPR relies upon indicating that Sites 6 and/or 7 are remotely viable. We assume that SPR must already have considered how it would deal with the impact on the properties in the immediate vicinity, please provide to us all of the SPR internal papers on this.**

### **Transportation**

ScottishPower Renewables has noted your comments and concerns regarding traffic and transport disruption. Please let me assure you that ScottishPower Renewables is currently exploring all transport-related options, which are not restricted to just the haul road or upgrade of the existing road network.

Part of the transport and access impact assessment will be to consider the local road network and its capacity, ensuring that the East Anglia projects do not have a significant cumulative impact when considered alongside the proposed development of Sizewell C. Please be reassured that ScottishPower Renewables will fully consider all transport and access potential impacts.

### **Compulsory purchase**

ScottishPower Renewables' preference is to secure rights to land required for its projects by reaching voluntary agreements with landowners and occupiers. With this in mind, parties with an interest in land potentially affected by the projects will be consulted with throughout. For temporary access for surveys and site investigations, ScottishPower Renewables will ask landowners for permission to take temporary access by agreement. Once the areas required for the construction, operation and maintenance of projects have been identified, negotiations will be entered into to secure the necessary land and rights over land.

In parallel, as part of the Development Consent Order applications and as permitted by the Planning Act 2008, it will be ScottishPower Renewables' intention to request compulsory powers to acquire land or rights over land as required but it will continue to seek voluntary agreements wherever reasonably possible. This is an approach taken by ScottishPower Renewables on other offshore windfarm projects and one that has been successful in securing the necessary land rights whilst minimising the need to use compulsory powers.

### **Site selection**

ScottishPower Renewables has undertaken various work streams to inform site selection which have been focused on the areas below:

- Site selection relating to the Suffolk Coast & Heaths Area of Outstanding Beauty;
- The specific landscape and visual impacts of the proposed substation infrastructure;
- Construction impacts relating specifically to access to the substation zones;

- The crossing of the Aldeburgh Road to facilitate a cable route to the west of Leiston and other pinch points along the cable route, in particular effects on setting; and
- The inclusion of land owned by EDF at Sizewell within the Onshore Study Area.
- 

ScottishPower Renewables must take a balanced view towards site selection, using the advice of ScottishPower Renewables' industry-leading legal advisors and technical advisors, in addition to ScottishPower Renewables' own significant project experience. Site selection is therefore carried out on the basis of a range of factors, including legal requirements, planning policy, technical engineering constraints, technical assessment (such as landscape and visual impacts and ecology) and with the benefit of knowledge gained on ScottishPower Renewables' previous projects.

16. Fourth, the proposed site (7) exacerbates an existing flood risk. The land running down to the site is a slope with water running downwards towards the proposed site. In winter the area is frequently flooded. The plan however involves the concreting over of a very large surface area at the bottom of the run-off slope. It is bound to increase significantly the risk of flooding. Indeed, that area is regularly flooded notwithstanding the already extensive improvements to drainage which have been introduced in recent years by the local farmers.

**17. Please provide details of all assessments that SPR would carry out to gauge flood risk.**

#### **Flood Risk**

Hydrology and flooding was considered as part of the desk-based assessment used to inform identification of available land for substation location and potential site selection. The Environment Agency's flood risk zones were used to identify proximity to fluvial flood risk to ensure that potential substation locations avoided these constraints.

A Flood Risk Assessment will be conducted as part of the environmental impact assessment which will inform mitigation as appropriate. This Flood Risk Assessment will use information provided by the local planning authority and the Environment Agency to ensure it considers the modelling study you refer to and the capacity of the existing flood alleviation scheme. If any significant impacts are identified through the development of the project, then mitigation will be agreed with the appropriate authorities and put in place to reduce these potential impacts.

As you are aware, the footprint of the substations is likely to be covered in hard-standing, which we know will have an impact on the water absorption and retention rates of the land. It is highly likely that a Sustainable Drainage System (SuDS) will be proposed as part of the substation(s) footprint. However, all mitigation will be proposed according to the environmental impact assessment and Flood Risk Assessment and agreed with the local planning authority and the Environment Agency.

Hopefully this response goes some way to reassuring you that ScottishPower Renewables acknowledges there will be potential impacts (not specifically to just water resources and flood risk) but are committed to mitigating those potential impacts as much as is possible.

18. Fifth, the documents published by SPR are confusing and unclear.

**19. Precisely how many substations are proposed and over what period of time? In relation to the two substations being mooted is it proposed that both will be sited on the same site?**

**20. In addition to those being proposed what other substations is SPR aware (including in relation to power entering Sizewell via interconnectors).**

#### **Substations**

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Three substations are proposed. The three substations would include one ScottishPower Renewables East Anglia ONE North substation, one ScottishPower Renewables East Anglia TWO substation and one National Grid substation. Co-location of all three substations in one zone is the preferred solution (as this reduces the proliferation of construction impacts and increases the ability to screen a single location), but a decision on whether to co-locate or not has not yet been made.

ScottishPower Renewables' current pipeline of projects comprises:

- East Anglia ONE, which is currently in construction
- East Anglia THREE which secured planning in August 2017 (both East Anglia ONE and East Anglia THREE, whilst off the coast of Suffolk, have no direct impact on Friston as their electricity cables will make landfall near Bawdsey much further south in Suffolk)

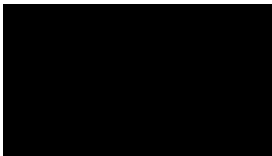
East Anglia TWO and East Anglia ONE North which are in the development phase. We have no further plans for windfarms in the Friston area.

We cannot provide information on the plans of other operators; however, we are aware of National Grid having offered connection agreements to two European interconnector projects in the area. It is an important part of the planning process that we consider cumulative impact and once further details are known of these projects we will undertake cumulative assessment in accordance with Planning Inspectorate advice and procedures – please see the Planning Inspectorate advice note:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf>

During the development phase of East Anglia TWO and East Anglia ONE North I have been appointed as stakeholder manager and will manage public feedback. I can be contacted via email ([jyoung@scottishpower.com](mailto:jyoung@scottishpower.com)) or phone (01502 509236/07738 063259). Should you have any further questions please do not hesitate to contact me. Additionally, I will be happy to meet you locally to discuss any matters and/or attend parish council meetings.

Kind regards,



Joanna Young  
Stakeholder Manager

## **Annex 4**

**Extract from Minutes of Friston Parish  
Council of presentation by SPR on  
5<sup>th</sup> March 2018**



## 1. Summary of the presentation made by Scottish Power Renewables

The purpose of the presentation was to inform Council of the plans to develop two new offshore windfarms and to connect them, in the vicinity of Sizewell, to the national grid. There will be on-shore development and the company wished to make Council aware of the implications.

In order to attach them, three new substations would be required – one for each of the windfarms and one for the National Grid. It is preferable to install them together. They include buildings of 15 metres high and 18-metre-high gantries. The footprints will be substantial at 2 no. 3.61 hectares and 1 no. 4.55 hectare.

The company has already spoken to a number of councils including Knoddishall and Leiston and is working closely with the planning departments of SCC and SCDC as well as holding public information days.

The stations will be unmanned but maintained and will not be up-lit. They will be coloured in a grey/green and landscaped and screened. All the cabling from the coast will be underground.

The construction will take place in 2024 – 2025.

The areas being investigated to site these new substations have been extended, based on the planning departments recommendation, to come further west from the coast and will possibly be closer to Friston. Sizewell A is not suitable as it isn't big enough.

To install the cabling is disruptive however, once installed there is no problem with general agriculture and usage although houses cannot be built on top of them.

There will be a red-line definition Summer 2018.

There are public information days 17<sup>th</sup>/18<sup>th</sup> and 24<sup>th</sup>/25<sup>th</sup> March. Information to be published on website and notice boards.

## **Annex 5**

**Leaflet distributed by Friston Parish  
Council on 29 March 2018**



**DON'T THROW THIS IN THE BIN! - PLEASE READ IT AND ACT**

**Major Infrastructure Project to come to fields near Friston?**

Scottish Power Renewables (SPR) will need to build a group of three electricity substations to connect their proposed two new offshore windfarms to the National Grid pylons.

SPR came to present to the Parish Council at their meeting on 5<sup>th</sup> March. No preference for a site location was mentioned at that stage, but it seemed likely to be in the Sizewell/Leiston area, and your Parish Council stated a preference for Zone 3 (see on the map overleaf).

However, at Public Information Days last weekend, the impression was given to several members of the public attending, that SPR are **leaning towards Zone 7** as their preferred site. This includes the area of land to the north of the village, on the way to High House Farm.

The substations will be huge, covering a total area of around 30 acres (16 football pitches, or a housing estate of 200 houses). The external gantries and housing buildings will be 15-18 metres (5-6 storeys) high. All transformers make a humming noise – so will these, as they will handle almost 2 GW of power.

They will need to be linked to the coast between Sizewell and Thorpeness by underground cables, which will cut a swathe 50 metres wide across the countryside.

Construction of the whole project is scheduled to start in 2024, and last for two years.

There is no local benefit to this project, but there will be disruption, noise, visual impact, local business impact, and possible flooding issues. If **Zone 7** is chosen, the haul route for construction traffic would be through Sternfield, and a new road to the site would be cut across fields between Manor Farm and Friston House. If necessary, a new bridge would be built across the Fromus in Sternfield.

More details of the project can be found online: Google “East Anglia Two”, and choose [www.scottishpowerrenewables.com/pages/east\\_anglia\\_two.aspx](http://www.scottishpowerrenewables.com/pages/east_anglia_two.aspx). It is worth looking at *SPR Information Boards March 2018, Onshore Study Area and Substation Zones* and *Statement of Community Consultation*.

It is worth having your say to SPR about the prospect of **Zone 7** being chosen, and quickly. Email contact is [eastangliatwo@scottishpower.com](mailto:eastangliatwo@scottishpower.com), or write to Scottish Power Renewables East Anglia Two, RTLY-RLGH-GKSE, FREEPOST, 25 Priestgate, Peterborough, PE1 1JL.

*This document has been compiled and distributed in haste, with the authorisation of the Chairman of Friston Parish Council.*

## **Annex 6**

**Email and enclosure from Mr & Mrs  
Fincham to Therese Coffey MP  
13 April 2018**

**From:** Louise Fincham [REDACTED]  
**Date:** 13 April 2018 at 16:56:36 BST  
**To:** [REDACTED]  
**Subject:** Scottish Power Renewables - East Anglia Two

Dear Ms Coffey

We are sorry to find ourselves adding to your mail bag but we are very concerned about these proposals.

Although our property would be directly impacted by the building of a large substation near Friston, we have not been notified of this project by or on behalf of Scottish Power. We only found out through a conversation with a neighbour on 2 April just over 24 hours before expiry of the deadline set by Scottish Power for submissions and comments. We immediately sent an email asking various questions and making observations. It is disappointing that we have not received any acknowledgement, still less a substantive reply from Scottish Power.

From what we understand, a decision will be made by Scottish Power in June on the location of the substation. It appears we are talking about an area the size of 16 football fields and a height of some 15m.

The electricity cables will come onshore at Sizewell which, of course, has two power stations with two more known as Sizewell C in prospect, although recent reports suggest that there may be a rethink by EDF. Be that as it may, it is perfectly obvious that the East Anglia Two substation should be placed on the brownfield space in and around Sizewell so as to minimise the impact on the environment. We have heard it said that the problem is that much of that land is owned by EDF. EDF can be subjected to a compulsory purchase order as much as any other body or person. Commercial rivalry between EDF and Scottish Power should not be allowed to ride roughshod environmental considerations.

Scottish Power say that a trough of some 50 metres wide has to be driven from the coast to the site at the substation in order to facilitate the laying of the cables. That will take its toll on the environment and on wildlife. Destruction of green fields, woodland and hedgerows would be minimised if not eliminated by using space around or as near as possible to Sizewell.

I am attaching for your information the questions and observations we have sent to Scottish Power. I will send you a copy of any response.

Meanwhile we would appreciate your comments on this proposal and we express the hope that you will do what you can to ensure there is no unnecessary environmental damage.

Yours sincerely

Anthony and Louise Fincham

[REDACTED]

"East Anglia ONE North and TWO projects: Concerns and objections

Introduction

1. We wish to record our serious concerns at the proposal to site a Substation at Sites 6-7 and of these the proposal for site 7 seems the most illogical and disruptive of local amenities. Our concerns are set out below together with some questions that we would like urgently answered.
2. Generally, we are very concerned at the lack of any real details. The documents on the SPR website are exceedingly vague and this makes realistic comments very difficult.

Lack of notice

3. However, SPR has not taken any steps to ensure that the properties most directly affected were notified of these proposals. The inhabitants of Friston (which is immediately adjacent to sites 6 and 7) found out about the proposal only by chance. The Parish Council leafleted the inhabitants informing the residents of the proposal. This was on 1<sup>st</sup> April. Before then virtually no one was aware of the plan. A concerned resident passed on the leaflet to us yesterday, 2<sup>nd</sup> April. Had this not occurred we would have been unaware of the proposal, even though we are located within a hundred metres of Site 7. This is an appalling way in which to treat those most likely to be affected by the proposal. We can only assume that this is reflective of SPR's general strategy towards consultation of the local affected community.
4. **Please respond by providing the full details of the steps which SPR has taken to ensure that all affected persons are notified properly and in advance.**
5. **Please also provide an explanation why we were not notified and an assurance that all future information will be sent directly to us at the address below and to our email address.**
6. **Because of SPR's failure to notify us we reserve all of our rights to supplement our views and comments. This includes the right to seek adequate answers using Freedom of Information Act powers**

Concerns

7. The observations that we make now below are therefore not in any way based upon an ability to have studied the documents we have now seen in any detail.
8. First, the obvious location is at the Sizewell plant itself or in its immediate vicinity, which would eradicate the harm otherwise to be caused to inland areas and their amenity. Given that this is the obvious location for the power plant there is no explanation as to why the Sizewell plant has been excluded. The consultation documents are deafening in their silence on this point.

6 (iii)

9. But if the site is to be inland it should be as close to the coast (and to the Sizewell plant) as possible to minimise inland disruption. Sites 6 and 7 are furthest away from the coast and from the Sizewell plant. The sites which would be least disruptive on this score would be Sites 2 and 3. Given the 50m wide trough or channel that is being planned the damage to landscape, hedgerows and wildlife etc would be incalculable. Sites 6 and 7 are very close to large wooded areas where there is a large amount of native wildlife including owls. The further inland that the sites are located the greater the harm to wildlife and amenity.
- 10. Please provide full information setting out whether the Sizewell site has been considered and if so why it is not now identified as a possibility. Explain why the land surrounding the Sizewell plant is not being included in the search area.**
- 11. Please provide full details of where and how the 50m wider trough would be located for each of the seven sites identified. Please provide any maps that SPR possesses which show the prosed routes.**
12. Second, in the SPR materials it is suggested that the local planning authority has already indicated a policy preference for the sites to be located inland and further away from the Coast. Our inquires (which due to the failure to notify have had to be brief) and our contacts with the local authority have not identified any such preference ever having been given. Indeed, the contacts that we have been able to make in the very small amount of time available indicate that the policy of the Council is the opposite.
- 13. Please therefore provide immediately full details of the policy indications said to be provided to SPR by the local authority and provide all documents which SPR relied upon in making this statement. Please provide the name and contact details of the individuals who are said to have provided this indication.**
14. Third for SPR to develop Sites 6 and 7 would necessitate a huge amount of disruption to Friston and the surrounding area. The road running through Friston (the B1121) is a main road connecting Aldeburgh and Saxmundham. It is single carriageway and the increase in traffic would have a huge and negative impact upon Friston village. To access the proposed site from the B1121 would then require accessing Grove road which has residential properties on both sides and is very narrow. The disruption to those on Grove Road would be vast and indeed it is hard to envisage how heavy machinery could gain access to the site via Grove Road at all, but certainly not safely.
- 15. Please provide all details of how SPR would propose to obtain access to the proposed site and what powers SPR would seek to use in order to achieve its objective. Please confirm whether SPR intends to use any compulsory purchase powers and if so which ones. Please provide copies of all working papers which SPR relies upon indicating that Sites 6 and/or 7 are remotely viable. We assume that SPR must already have considered how it would deal with the impact on the properties in the immediate vicinity, please provide to us all of the SPR internal papers on this.**
16. Fourth, the proposed site (7) exacerbates an existing flood risk. The land running down to the site is a slope with water running downwards towards the proposed site. In winter the area is frequently flooded. The plan however involves the concreting over of a very large

surface area at the bottom of the run-off slope. It is bound to increase significantly the risk of flooding. Indeed, that area is regularly flooded notwithstanding the already extensive improvements to drainage which have been introduced in recent years by the local farmers.

- 17. Please provide details of all assessments that SPR would carry out to gauge flood risk.**
- 18. Fifth, the documents published by SPR are confusing and unclear.**
- 19. Precisely how many substations are proposed and over what period of time? In relation to the two substations being mooted is it proposed that both will be sited on the same site?**
- 20. In addition to those being proposed what other substations is SPR aware (including in relation to power entering Sizewell via interconnectors).**

## **Annex 7**

**Email from Friston Parish Clerk  
to Mary Shipman  
29 March 2018**

**Subject:** FW: Scottish Power Sub-station

**Date:** Friday, 30 March 2018 at 13:13:57 British Summer Time

**From:** Mary Shipman

**To:** ian cook

**CC:** [REDACTED]

Ian

Here is the email I received yesterday. I have copied it to Tony in case he has not received it.

Mary

-----Original Message-----

From: Friston Parish Clerk <fristonpcclerk@btopenworld.com>

To: Friston Parish Clerk <fristonpcclerk@btopenworld.com>

Sent: Thu, Mar 29, 2018 3:34 pm

Subject: Scottish Power Sub-station

Recently at a meeting, Scottish Power renewables presented to council that they were looking for a large site on which to build 3 sub stations in the areas around Leiston. There were a number of sites being considered.

Following attendance at a consultation meeting, Cllr. D Brooks discovered that a site nearest to Friston appeared to be preferred. Similarly letters about this had been sent out in Knoddishall but nothing in Friston. The Chairman is contacting the land agents – Savilles and the Scottish Power representatives to find out more. However, in the meantime, the attached has been prepared.

Please feel free to distribute as you wish.

Karen Forster

Clerk to Friston Parish Council

[REDACTED]



## **Annex 8**

**Email from Ian & Mary Shipman to SPR  
2 April 2018**

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**Subject:** Proposals for new windfarm, cables and substations

**Date:** Monday, 2 April 2018 at 13:17:39 British Summer Time

**From:** Mary Shipman

**To:** eastangliatwo@scottishpower.com

**CC:** eastanglialand@scottishpower.com



Dear Sirs

We have only in the last few days been made aware of these proposals which would negatively affect our home in Friston and also our enjoyment of the local environment. We came to Friston 25 years ago drawn by the beauty of the landscape and the way of life in the area.

In particular we object to the erection of the substations in Zone 7 of the proposed plan for the following reasons:-

- The area designated as Zone 7 is in an elevated position relative to the surrounding settlements and would be highly visible over a wide area.
- There are a number of Grade II Listed Buildings within this area and their setting would be blighted by the permanent installation of a substation.
- There are a large number of footpaths and bridleways in this area which are regularly used by residents and visitors. Any temporary or permanent closure of these rights of way would be very detrimental to the amenity of the area.
- Zone 7 is the farthest area from landfall under consideration and the resultant additional disturbance and increased cost cannot be justified.
- Friston and in particular Grove Road/Church Path is already at risk of flooding from run off from the higher fields to the north. This would be exacerbated by the construction of the substation and during works to lay cables.
- There are many underground watercourses in the area and a large number of wells, many of which are in private gardens, including our own. There is a threat of pollution to this water supply.
- The area is rich in wildlife and the works would lead to the fragmentation of habitats and potential loss of species.
- There are a number of active archaeological groups in the area and there is potential for damage to, as yet, undiscovered remains.
- There is a risk to health to the local population from dust and noise in the construction phase as well as the impact on health from electric and magnetic fields around the substations and power cables.
- The coast of Suffolk is a very popular tourist destination and many local businesses rely on this for their survival. The construction phase and the permanent siting of the substations is extremely likely to deter visitors and effect the economy of the region.
- The 50M wide swathe of land required for the laying of cables would involve the removal of a considerable amount of vegetation, which would scar the landscape for a considerable length of time.
- Any proposed screening of the substation would take decades to reach a maturity sufficient to screen the 18M height.
- The area is accessed by many minor roads, often single track, which are totally unsuitable for construction traffic. The proposals for further development at Sizewell C already threaten to overwhelm the local road network and it is totally unacceptable to consider another major development in the same area.

In addition to the above we are also concerned about the siting of the new wind turbines which will be closer to the shore than those already existing. These will be visible from the shore and present an unwelcome sight at night. There are many keen recreational sailors in the area as well as those attracted here for sailing holidays. Again this could affect tourism and the economy in the area.

## **Annex 9**

### **SPR's Feedback Form Phase 2 Consultation**

East Anglia TWO Offshore Windfarm  
East Anglia ONE North Offshore Windfarm

# Public Information Day - Feedback Form

Thank you for attending today's Public Information Day. We hope you found it useful to find out how our projects are progressing and we answered your questions. We welcome your feedback and will be holding more events in June to update you further.

**1. How did you hear about today's information day?**

- Flyer through door
- Press release in local newspaper
- Advert in newspaper
- Parish Council
- Website
- Word of mouth
- Poster
- Social media
- Other (Please specify) .....

**2. Did you attend our previous Public Information Days in October/November 2017?**

- Yes
- No

**3. Did you find today's event helpful in informing you about our proposals?**

- Yes
  - No
- What did you find particularly helpful? ..... If no why? .....
- .....
- .....

**4. Were our presentation boards clear and understandable?**

- Yes
  - No
- If no. why not? What would help improve them? .....
- .....

**5. Do you feel that all of the relevant viewpoints of the offshore wind turbines were presented in today's visualisations?**

- Yes
  - No
- If no. why? .....
- .....

**6. We are currently searching within our agreed study area to find a suitable location for our projects' substations (see Board 5 and our interactive map). An assessment of the landscape impacts specifically in relation to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) was undertaken. All sites to the West of Aldeburgh Road (B1122) would avoid significant effects on the special qualities of the AONB. In your view, should potentially adverse visual impacts on the AONB be avoided by placing our substations west of the Aldeburgh Road (B1122)?**

- Yes
  - No
- If no. why? .....
- .....

**7. In your view, in order to cross Aldeburgh Road (B1122), would it be acceptable to have a direct impact on residential property?**

- Yes
  - No
- If no. why? .....
- .....



8. What mitigation would you like to see to minimise the impact of our onshore substations?

.....  
.....  
.....  
.....

9. Do you have any comments on the contents of our Statements of Community Consultation for EA TWO and EA ONE North? (Please note that formal consultation is currently underway and concludes on 31st April 2018)

.....  
.....  
.....  
.....

10. Please use the space below to provide any other additional comments about today's Public Information Day or about our proposals for East Anglia TWO or East Anglia ONE North.

.....  
.....  
.....  
.....  
.....  
.....  
.....

**PLEASE CONTINUE ON A BLANK PIECE OF PAPER IF NECESSARY.  
PLEASE PLACE YOUR COMPLETED FORM IN THE BOXES PROVIDED. ALTERNATIVELY, YOU CAN RETURN IT TO  
SCOTTISHPOWER RENEWABLES USING THE FREEPOST ADDRESS BELOW.**

Name: .....  
Address: .....  
.....  
Tel: .....  
Email: .....  
Organisation (if appropriate): .....

To learn more about our proposals, or to contact us please use one of the following:

Website

[www.scottishpowerrenewables.com/pages/east\\_anglia\\_projects](http://www.scottishpowerrenewables.com/pages/east_anglia_projects)

Email

East Anglia TWO:  
[eastangliatwo@scottishpower.com](mailto:eastangliatwo@scottishpower.com)  
East Anglia ONE North:  
[eastangliaonenorth@scottishpower.com](mailto:eastangliaonenorth@scottishpower.com)

Write to us

ScottishPower Renewables EA2 and EA1N  
RTLY-RLGH-GKSE  
FREEPOST  
25 Priestgate  
Peterborough  
PE1 1JL

The data you provide here is being collected and securely stored by Athene Communications on behalf of ScottishPower Renewables. Your personal information will be used solely for the purposes of communicating with you about the East Anglia TWO and East Anglia ONE North projects.

Your responses to this feedback form will be collated to ensure your identity is protected. The collated results will be reviewed by the project team and wherever possible your feedback will help to shape the plans.



## **Annex 10**

**Royal HaskoningDHV's analysis of the  
Feedback received at Phase 2  
regarding site location**

Feedback received via free text on the feedback forms that related to substation location was as follows:

Table 4 Feedback on site zones

Location	Comment
<b>Lowestoft</b>	No comments were made about the location of the substations in Lowestoft. One person did mention how the location of the substations wouldn't affect them living in Lowestoft.
<b>Leiston</b>	Five out of the 12 additional comments made at the Leiston event suggested the substations should be in zones 1, 2, 3 or 4, closer to the coast. Reasons for this choice included using existing infrastructure surrounding these zones and reducing the overall impact of the substations and a similar existing power station on the wider area.
	Two of the additional 12 comments from Leiston feedback suggested the substations should be further inland, in zone 7. The reasons for locating the substations in zone 7 were to reduce damage to the coastline, environment and AONB.
<b>Thorpeness</b>	In total, five comments were made in response to question eight about the location of the substations following the Thorpeness event.
	Four of these comments would prefer the substations to be in zones 1, 2 or 3, along the coast. The comments suggest that locating the substations in one of these zones will reduce the overall impact on the area. This is because the substations will be closer to a similar, existing power station.
	One comment suggested that existing infrastructure can be used if the substations were in zones 1, 2 or 3.
	One of the comments suggested that the substations should be located inland, using zones 5, 6 or 7, to reduce the impact on the AONB and 'crumbling coastline'.
<b>Aldeburgh</b>	Feedback from the Aldeburgh Public Information Day revealed several comments relating to the location of the substations.
	One comment from question eight would prefer the substations to be 'away from the coast and AONB'. One comment would prefer the substations to be located near Sizewell, on the coast.
	One person suggested the substations should be in zone 7
	Three comments were made in the additional comments section, all in favour of the substations being in zones 1 or 2. These zones are preferable because of the existing infrastructure in the area and reduced visual impact on the landscape. No comments were made about the preferred location of the substations in feedback from the Orford event.
<b>Orford</b>	No comments were made about the preferred location of the substations in feedback from the Orford event.
<b>Postal</b>	45 out of 47 feedback forms received via post made comments about the location of the substations
	29 people stated a preference for the substations to be located on the coast. Three people stated a preference for the substation to be located further inland. 13 people did not specify a preferred zone
	In question five, five comments were made about the location of the substation. All were in favour of the substations being near the coast where they will have less effect on residential properties
	In question six, 24 comments were made about the location of the substations. 21 of these comments suggested the substations be placed near the coast. Three comments were in favour of the substations being located further inland. One comment specified that the villages

Location	Comment
	near zones 5 and 6 would not cope with the effects of the substations. Two comments said that substations should be inland, away from the AONB
	In question seven, 42 comments were made about the location of the substations. 27 of these comments did not state a preferred zone for the location of the substations but emphasised the need to reduce the impact of the substations on residents and the environment. 11 comments suggested the substations should be located on the coast
	In question eight, 22 people preferred the substations to be near the coast, close to an existing industrial area. Zones 2 and 3 were mentioned as preferred zones seven times. Two people were in favour of the substations being in zones 5, 6 or 7
	Finally, in the additional comments section, 14 comments were made in favour of the substations being located on the coast. Zones 1, 2 and 3 were preferred by seven people because of the proximity to another substation and because existing infrastructure can be used. An additional seven people mentioned using a zone close to the existing substation near the coast. One comment suggested the impact on the village of Knodishall will be reduced if the site is located near the coast. Two comments suggested that if zones 1, 2 or 3 couldn't be used then zone 7 would be the most suitable

It is not known which of the events people who returned postal feedback attended. In general, postal feedback was longer in length and more detailed. Overall, respondents had more to say about the location of the substations than in the feedback collected at the events, even if they did not specify a preferred zone.

## 2.2 Other Feedback

In general feedback from all the events was positive and constructive

Specific areas of concern were:

- Noise pollution and its long-term effects on health and the environment
- Visual impact of the substations
- Local tourism
- Farming
- Vulnerable residents including elderly and children
- Health of residents within proximity of the substation
- Environment, habitats and wildlife
- House prices.



## **Annex 11**

### **SPR's "Notification of Statement of Community Consultation" March 2018**

# East Anglia TWO and East Anglia ONE North Offshore Windfarms

## Notification of Statement of Community Consultation

ScottishPower Renewables (SPR) is developing two offshore windfarm projects known as East Anglia TWO and East Anglia ONE North.

East Anglia TWO covers approximately 255km<sup>2</sup> and will be around 30km from the East Anglia coast at its closest point.

East Anglia ONE North covers approximately 208km<sup>2</sup> and sits 36km from the East Anglia coast at its closest point.

SPR has published two Statements of Community Consultation (SoCC) in accordance with Section 47 of the Planning Act 2008, one for each offshore windfarm project.

It is intended to submit an application for consent to the Planning Inspectorate for East Anglia TWO in 2019. The application for East Anglia ONE North is then intended to follow in 2020.

Each SoCC sets out how SPR intends to consult with local communities within the vicinity of the projects.

The company welcomes your views on the projects, and invites you to review these documents, and respond by midnight on **3rd April 2018.**

SPR has dedicated email addresses:  
[eastangliaonenorth@scottishpower.com](mailto:eastangliaonenorth@scottishpower.com)  
[eastangliatwo@scottishpower.com](mailto:eastangliatwo@scottishpower.com)

You can reach SPR at:  
ScottishPower Renewables East Anglia TWO  
RTLY-RLGH-GKSE  
FREEPOST  
25 Priestgate  
Peterborough PE1 1JL

All consultation responses received by the projects will be recorded and details may be included within the consultation report, to be submitted alongside the application for consent. SPR will not share individuals' data, only the area they are from.

To launch the consultation, SPR is holding six drop-in information events, where members of the project team, together with specialist consultants, will be available to answer questions on East Anglia Two and East Anglia ONE North. These are taking place as shown below. No appointment is necessary.

Each SoCC is available on the project websites, as follows:

**East Anglia TWO Offshore Windfarm**  
[https://www.scottishpowerrenewables.com/pages/east\\_anglia\\_two.aspx](https://www.scottishpowerrenewables.com/pages/east_anglia_two.aspx)

**East Anglia ONE North Offshore Windfarm**  
[https://www.scottishpowerrenewables.com/pages/east\\_anglia\\_one\\_north.aspx](https://www.scottishpowerrenewables.com/pages/east_anglia_one_north.aspx)

The documents will also be available to view at the following locations from 6th March 2018 - 3rd April 2018

- Aldeburgh Library
- Aldringham-cum-Thorpe Parish Council
- Aldeburgh Town Council
- Felixstowe Library
- Felixstowe Town Council
- **Friston Parish Council**
- Great Yarmouth Borough Council
- Great Yarmouth Central Library
- Kessingland Library
- Leiston-cum-Sizewell Town Council
- Lowestoft Library
- Martins Saxmundham
- Orford Town Council
- Saxmundham Library
- Southwold Library
- Southwold Post Office
- Southwold Town Council
- Suffolk Coastal District Council Services at Woodbridge Library
- The Village Store Kessingland

Venue	Date	Time
<b>Lowestoft</b> - Victoria Hotel, Kirkley Cliff Rd, Lowestoft NR33 0BZ	17 March 2018	10am – 1pm
<b>Southwold</b> - Stella Peskett Hall, Might's Rd, Southwold, IP18 6BE	17 March 2018	3pm – 6pm
<b>Leiston</b> - Leiston United Church, 45a High Street, Leiston, IP16 4EL	18 March 2018	10am – 1pm
<b>Thorpeness</b> - Thorpeness Country Club, The Benthills, IP16 4NU	24 March 2018	10am – 1pm
<b>Aldeburgh</b> - The Jubilee Hall, Crabbe Street, Aldeburgh, IP15 5BN	24 March 2018	3pm – 6pm
<b>Orford</b> - Town Hall, Market Hill, Orford, Woodbridge IP12 2NZ	25 March 2018	10am – 1pm



## **Annex 12**

**Extract of Minutes of Friston Parish  
Council of presentation by SPR on  
16 April 2018  
Slide on Site Selection of same date**

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## Presentation from Scottish Power Renewables (SPR)

Following the presentation on 5<sup>th</sup> March, there were a number of information days where statements were made that inferred that site 7, which strongly affects Friston Parish residents, is the preferred site. Scottish Power Renewables were asked to come back and clarify this as no mention had been made of any preference in the original presentation.

*Note: The representatives have promised to supply the presentation and therefore this summary will not cover that detail. It was initially a repeat of the presentation made on 5<sup>th</sup> March but with additional slides at the end. The summary of that original presentation is covered on the minutes 5<sup>th</sup> March.*

Below is a list of points made and questions/responses made.

A member of the public asked why Scottish Power had not sent members of their own company to make the presentation and answer the questions. The representatives were Philip Watkins of Eastern Edge (<http://www.eastern-edge.com/>) who are Consultants to Investors in the energy sector and Phil Williamson who works for the environmental consultancy RHDHV. <https://www.royalhaskoningdhv.com> (note – the communications are being managed by Kelly at Athene Communications Ltd.)

They confirmed that two new wind farms (East Anglia 1 North and East Anglia 2) are being considered now and that the onshore work would be scheduled to begin in 2024. They need to build 2 substations (for the windfarms) and 1 national grid substation. The project started in 2010. Last autumn they began talking to the District and County Councils and had some public information days at the end of November. They were at the time looking at sites nearer the coast. The amount of land is in the region of 15 hectares. The building would be up to 15m high and gantries of maximum 21 metres high.

Both windfarms have been approved by the secretary of state. They believe the whole project will be examined in court.

Originally the plan for sites extended from the coast to the Aldeburgh road. The Local planning association (LPA) suggested that they looked further west.

They are not able to use the land owned by EDF or negotiate buying it.

There is not enough room at Sizewell A and questions were asked as to who owns Magnox.

The site will have a buffer zone 250 mt from developed areas.

Following the subsequent assessment, western areas were preferred due to the identified eastern sites being partly or all within an Area of Natural Beauty (AONB). Unless due to exceptional circumstances, no development can take place on AONB land. SPR to confirm when AONB got its status. If there is another option available, that must be the one used.

In response to a question of how Sizewell has been built and a new one constructed the answer was that it needed the in and outflow of the sea. This was refuted by the questioner as the sea could be pumped to an inland site and therefore another option was available.

At the March information day, their purpose was to collect information as to why Western sites would or would not be preferred to Eastern sites. It was communicated at that point that the western sites are preferred.

They are discussing the woodland that might be affected with Natural England.



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# FRISTON PARISH COUNCIL

They reiterated that no final decision has been made. However, after having considered all the points and assessing them under a RAG (red, amber, green) process they have prioritised 3 sites. 1 in the East and 2 in the west, however, as the 1 in the east is impacting on the AONB, the 2 in the west are preferred.

They will be communicating to the LPA in the next 2 weeks and an announcement will be made by Scottish power in mid-may.

The RAG exercise did not include any economics and costs.

A member of the public asked if they could push back on EDF for not freeing up the land. If Sizewell C does not go ahead, it will be too late to resite the preferred location for the new substations.

A member of the public stated that land to the west has a higher agricultural value – has that been factored in. Yes was the reply.

A member of the public asked if the substations could be sited offshore. No, was the reply as the technology does not exist to allow that.

The noise level had been raised in the flyer put out by the council. Phil Watkins (PW) stated that it will be in the region of 35DCB, based on the current substations for EA1. A member of the public asked what the frequency would be as that would affect the audibility and also the noise measurement criteria. Not known.

A member of the public pointed out that as there is no background noise in the rural area, this would impact on people. PW stated that an impact assessment would be carried out on the preferred site and the impact would be mitigated if necessary.

A member of the public asked why the LPA gave more priority to the AONB rather than the people and asked why that could not be challenged

PW stated that the disruption to people would be for a short time and not until 2024. A member of the public stated that the disruption had already started. People were anxious about the possibility of this development and it would affect the ability to move house.

Philip Watkins (PWa) stated that all letters received should have a reply in 2 weeks.

PW confirmed that no weighting was used in the RAG assessment.

A member of the public asked if there was any risk to health with the substations. PW stated that studies show no impact on health.

A member of the public asked about construction access. PW stated this could not be confirmed as they had not made the decision about the location of the site. He was asked if this was part of the RAG evaluation and stated no. They will create local temporary haulways to HV's off local roads.

A member of the public stated that it will be devastating and that zone 2 or 3 is closest to the services road.

PW confirmed that the AONB was designated in 1975 and was a parliamentary decision. There was much comment on how unattractive it was and how people's lives would not be affected if the



substations were sited there. A member of the public stated that it was ridiculous to “install 15 football pitches of humming machines” in a rural area.

PW stated that they have to follow planning regulations as well as parliamentary regulations.

PWa stated that people in the tourist business were keen that it was not sited in an AONB area.

County Councillor Reid spoke. A joint letter from SCC and SCDC had been sent to SPR. He would send a copy to the clerk to be shared with parishioners. SCC and SCDC do not support any of the proposed sites as there is insufficient information.

There is a balance to be struck between new developments in the AONB and open countryside and the stance of the SCC/SCDC is to support sites on the East as they have less impact.

Of great concern is that, in addition to the proposals from SPR, SCC & SCDC are aware that there will be 2 intercontinental connectors to connect to Belgium and Netherlands. These dwarf the proposed substations and are likely to be located in the same site. SCC/SCDC state that therefore this needs to be considered as a whole and not piecemeal..

The audience gave a round of applause as approval of the letter.

PW confirmed the following timetable.

- May – A decision will be announced
- June – the cable route will be determined
- November – Impact assessment and Environmental information report will be compiled
- Qtr 2 2019 - formal planning application made.

All comments received will go into the application.

A member of the public asked about the voltage of the power.

A member of the public stated that she had downloaded the 209 pages of scoping submission which was almost unreadable. She was not confident based upon the amount of times that SPR has had to revisit its decisions and recommendations. There was only a small section dedicated to the effect on human being as opposed to pages on the effect on the birds, animals and plants. There needed to be much simpler, clearer documentation available.

A member of the public & the Council Chairman thanked the representatives for coming. A member of the public stated that this causing a lot of stress.

## East Anglia TWO & East Anglia ONE North – input to site selection

- **JULY 2017:** NG update on CION process & move to Sizewell location  
briefing with Suffolk CC and Suffolk Coastal & Waveney DC
- **SEPTEMBER 2017:** onshore study area workshop with SCC and SCDC
- **OCTOBER 2017:** onshore study area update following LPA feedback &  
substation zone locations  
Public Information Days in various locations
- **DECEMBER 2017:** results of RAG assessment, workshop on preferred zones &  
eastern zones site visit
- **FEBRUARY 2018:** update on site selection works, workshop and all zones site  
visit

## **Annex 13**

**Extract from Appendix 4.1 of SPR's  
Phase 4 Consultation documents**



# Appendix C Descriptive text to support landscape RAG assessment for SPR substations

## **Annex 14**

**RAG Assessment of National Grid  
substation, dated September 2017, and  
first published in Phase 4 Consultation  
February 2019**

National Grid Substation Options (by relevant Zone)	NG4 (Fig4.2)	NG2 (Fig4.3)	NG1 (Fig 4.6)	NG7 (Fig4.4)	NG6 (Fig4.5)	NG5 (Fig 4.7)	NG8 (Fig4.8)
Highway access (construction and operational)	Access via Aldringham	Access via Sizewell Gap Road	Access via Aldringham				Access via Sizewell Gap Road
Proximity to high voltage electrical transmission infrastructure (overhead lines)			Requirement for sealing end compound + >1km cable			Requirement for sealing end compound + >500m cable	
<b>Community</b>							
Presence of residential properties		Properties within 250m		Properties within 250m	Properties within 250m	Properties within 250m	
PRoW / National trails (NT)	Public footpath <100m	Public bridleway <100m	Public footpath <100m	Crosses public footpath	Crosses public footpath		
Agricultural Land Classification	ALC Zone 2 or 3		ALC Zone 2 or 3	ALC Zone 2 or 3	ALC Zone 2 or 3	ALC Zone 2 or 3	ALC Zone 2 or 3
Sensitive land uses (schools and hospitals)							
<b>Property</b>							
Number of landowners				2 or more landowners		2 or more landowners	
<b>Planning</b>							
Current planning applications or knowledge of other developments							Proposed Sizewell C reptile mitigation land
<b>SCORE</b>	<b>1 red</b> <b>9 amber</b> <b>12 green</b>	<b>4 red</b> <b>7 amber</b> <b>11 green</b>	<b>4 red</b> <b>7 amber</b> <b>11 green</b>	<b>1 red</b> <b>9 amber</b> <b>12 green</b>	<b>3 red</b> <b>6 amber</b> <b>13 green</b>	<b>1 red</b> <b>9 amber</b> <b>12 green</b>	<b>1 red</b> <b>8 amber</b> <b>13 green</b>

Table 4.1: RAG assessment table of development considerations for the seven potential NG AIS substation locations

\*Note: Consultation with Suffolk Wildlife Trust identified that Grove Wood woodland should be identified as a Local Wildlife Site. This would result in an additional Amber score for NG7 as this site would be within 500m. This would result in a zone score of 1 red, 10 amber and 11 green for Zone 7. This is not reflected in the table as this consultation response was received post-publication. This update does not alter the conclusions of this document or the site selection process.

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National Grid Substation Options (by relevant Zone)	NG4 (Fig4.2)	NG2 (Fig4.3)	NG1 (Fig 4.6)	NG7 (Fig4.4)	NG6 (Fig4.5)	NG5 (Fig 4.7)	NG8 (Fig4.8)
<b>Archaeology</b>							
Proximity to National Designations – SMs, Grade 1 Listed Buildings)		<500m to Heritage Coast		<500m to Listed Buildings	<500m but screened by woodland	<500m but screened by woodland	
Proximity to Regional Designations – Local Historic Environment Records, grade II Listed Buildings	<500m to HER monument	<500m to HER monument	<500m to HER monument	<500m to HER monument	<500m to HER monument	<500m to HER monument	<500m of HER monument
<b>Ecology</b>							
Proximity to National Designations – SSSI / SPA	>500m to SSSI / SPA	>500m to SSSI / SPA	>500m to SSSI / SPA				<500m to SPA / SSSI
Proximity to Local Designations – Local Nature Reserves (LNR) / Suffolk County Wildlife Site							<500m to Sizewell Belts Nature Reserve
Proximity to mature woodland / Environmental Stewardship scheme	<500m to mature woodland	<500m to mature woodland	<500m to mature woodland	Cable route requires removal of mature woodland	Cable route requires removal of mature woodland	Cable route requires removal of mature woodland	<500m to mature woodland
<b>Landscape – see Appendix D for explanation of RAG scoring</b>							
Potential to affect the special qualities of the AONB							
Proximity to Special Landscape Areas (SLA)							
Landscape character and sensitivity to development							
Opportunity to utilise existing features for screening							
Visual sensitivity to development							
<b>Hydrology / hydrogeology</b>							
Proximity to licenced abstraction points							
Presence of potentially contaminated land							
Source Protection Zone					Within SPZ2	Within SPZ2	
Proximity to fluvial flood risk					<500m to FZ3	<500m to FZ3	<500m to FZ3
<b>Engineering</b>							

## **Annex 15**

**Formal letter of complaint from SASES  
to PINS**

**1 August 2018**

15(1)



Head of Infrastructure Planning  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  
email: [NIEnquiries@pins.gsi.gov.uk](mailto:NIEnquiries@pins.gsi.gov.uk)

[Redacted]

email: [Redacted]

Your Ref: EN010077 & EN010078

1 August 2018

Dear Sir/Madam      Re: **Scottish Power Renewables EA1N and EA2 Projects**

I am writing on behalf of a Working Party of Friston Parish Council, which has the support of the neighbouring rural Parish Councils of Knodishall, Aldringham-cum-Thorpe, Benhall and Sternfield. The working group has the public name **Substation Action – Save East Suffolk (SASES)** and has the objective of opposing the unnecessary and avoidable industrialisation of rural Suffolk countryside and communities by power companies such as Scottish Power Renewables (SPR), National Grid Ventures (NGV) and National Grid Electricity Transmission (NGET). For the avoidance of doubt SASES fully supports the generation of electricity from renewable sources so long as this is implemented in a way that properly respects the needs of communities and the countryside, as well as the specific needs of natural habitats.

This letter is a Formal Complaint to PINS relating to the so-called Consultation managed by SPR for their East Anglia 1 North and East Anglia 2 wind farms. We assert that this Consultation has failed to meet the requirements of the relevant Planning Acts, Planning Advice Notes, and PINS guidance, and that as a result the conclusions reached by SPR, in particular with regards to Site Selection for its On-Shore substations, are invalid.

We believe that the only acceptable remedy to this failure would be to halt this stage of the project and for the Consultation process for the On-Shore works to be rerun from an early stage with the existing process failures rectified. Failure to address this complaint will give rise to lengthy and time consuming objections at the Hearing stages of the DCO application which is not in anyone's interest.

**Background**

1. The EA1N and EA2 projects are for the creation of electric power for the UK grid using massive off-shore wind farms. EA1N has a target capacity of 800MW whilst EA2 has a target output of 900MW. Taken together with the SPR EA1 and EA3 wind farms (already

consented) the total power output will be 3.6GW, which is the total that NGET approved SPR to deliver to the grid a number of years ago.

2. It should be noted that it was originally planned that all this power would be delivered to NGET from three 1.2GW wind farms via an underground cable route from landfall at Bawdsey to the existing major substation site at Bramford, and this cable route is currently under construction. However, due to a series of SPR project decisions, which we continue to assert were unacceptably flawed, little more than half of this power can now be delivered to Bramford, and SPR has therefore been directed by NGET to search for a new substation site near to a fresh landfall at Sizewell/Leiston, together with a new cable route.

3. The EA1N and EA2 projects therefore comprise three main elements:

- Off-shore wind farm structures and buried cables. These will be sufficiently far out to sea to be barely visible from the coast and will have impact only on specialist communities such as fishermen.
- Two On-shore SPR substations required to convert the wind farm electricity to a voltage and quality suitable for connection to the National Grid, together with an NGET substation providing connectivity to the grid itself and also overload protection. These substations are preferably, but not necessarily, located at the same site. The proposed substations are extremely large (total circa 30 acres footprint) and comprise ugly electrical equipment and metal structures only partially housed in buildings up to 18m high, which cannot reasonably be made unobtrusive in any rural setting. They are also known to produce high levels of audible noise which is very hard to mitigate and likely to affect nearby communities. 'About as loud as the dawn chorus' was how the noise level was described recently at a PID. In the countryside, with little or no background noise that's very loud and wakes many people up!
- A cable route 50m wide from landfall to the SPR substation location to be excavated and then backfilled together with (potentially) a further cable route from the SPR substation location to the NGET substation location. This cable route will be extremely disruptive during construction but should be capable of being restored to a good standard, except that tree planting cannot be allowed and permanent cable access chambers will be required every 1km.

It will be readily apparent from the above that the key project decision to be made is that of On-shore Site Selection for the SPR and NGET substations. SASES asserts that consultation on this topic has been totally disorganised and non-compliant with any reasonable consultation process.

### Consultation Process

4. Prior to October 2017 SPR published a Flow Chart of their Public and Technical Consultations for the EA1N and EA2 projects. This is appended below as Figure 1. A plan was also made available on the Public Information Boards at the PIDs in **October 2017** showing the Onshore Study Area for the required on-shore substations and the cable route. This is appended below as Figure 2.

Examination of the flow chart shows that consultation for the On-shore constraints (including the critical issue of substation location and cable route) was scheduled for **October, November and December 2017**, with an update on progress to be provided in March 2018 following landowner engagement during January and February 2018.

Clearly the consultations in late 2017 were the appropriate and correct time for all affected communities to be allowed to understand the project implications and express their views on the most suitable sites for the substation.

It is appropriate to note that this point that an SPR Director and accompanying Stakeholder Manager told SASES (meeting of 18 July 2018) that their approach to public consultation for EA1N and EA2 was based on the process they applied to their earlier EA1 project. But in the EA1 case **no site selection was required** as NGET had directed SPR to deliver power to the existing Bramford substation site at which more than adequate additional land was available for SPR's equipment. SPR's failure to appreciate that EA1N and EA2 had serious site selection challenges may be at the root of the failure of the current consultation.

5. Despite SPR claiming to start consultation on substation site selection in October 2017 it is a matter of record that Friston Parish Council, despite having land within the Onshore Study Area and being a significant rural community adjacent to the area, was not informed of the SPR projects until **5 February 2018**, and then only by a single email with no follow up by surface mail or other means to ensure receipt. In addition it is a matter of personal experience by local BT Internet users with BT internet email accounts that even now a proportion of important official emails from SPR are treated as 'Spam' and not notified to recipients and can thus be effectively lost, or at best only received late. The act of sending an email cannot be treated as proof of receipt. In the case of a Nationally Significant Project on which so much future expenditure is planned this is simply unacceptable.

6. In February 2018 SPR offered to brief Friston Parish Council and a time slot was provided for this as part of at the next Parish Council meeting on **5 March 2018** (the Parish Council meets on a six-week schedule and public notice is required of any extraordinary meetings), which was one day before the SoCC public consultation started on 6 March 2018. The Parish Clerk has advised that 'At the presentation it was repeatedly stated that the preferred area was by the coast and that absolutely no decision had been made' and further that no copy of the SoCC for consultation was mentioned or provided at that meeting and in any case there is no facility in Friston for the public to have access to such a document, despite the claims made in SPR's public SoCC advert (appended as Figure 3), which in any case failed to bring residents attention to the potentially very serious on-shore implications of SPR's projects as distinct from the off-shore aspects which are referred to.

It was only later in March, when a single Friston Parish Councillor attended a PID meeting at Thorpeness and was briefed on the progress made with site location, including viewing the new Potential Substation Zones Map (appended as Figure 4) that Friston residents were given any awareness of the projects, by which time we believe that site selection had been effectively been finalised and was no longer subject to meaningful consultation.

7. In consequence of the **gross failures by SPR** inherent in paragraphs 5 and 6 above the residents of Friston, (and other nearby Parishes) were completely unaware of the Consultation undertaken in late 2017 which was, of course, precisely the consultation they needed to be involved with for site selection. By the time that they were made aware it



appears to have been too late to have any meaningful impact, as confirmed by SPR consultants at recent Parish Meetings. **How can this be regarded as a compliant Consultation Process? We believe it cannot.**

### Site Selection Process

8. Further process failures have been found with the Site Selection Process and associated consultations. As examples:

- Meaningful consultation has to be based on the provision of clear information offering choices upon which feedback can be provided. At no time has SPR provided such choices or asked for site selection feedback on the seven zones in other than in the broadest terms and using such leading phrases as to be render any responses totally unreliable. Such feedback has only now been sought and too late in the process for it to have any meaningful impact.
- As an example of a Feedback Question using leading wording consider Question 6 from the March 2018 PID Feedback Form:  
*"We are currently searching within our agreed study area to find a suitable location for our projects' substations (see Board 5 and our interactive map). An assessment of the landscape impacts specifically in relation to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) was undertaken. All sites to the West of Aldeburgh Road (B1122) would avoid significant effects on the special qualities of the AONB. In your view, should potentially adverse visual impacts on the AONB be avoided by placing our substations west of the Aldeburgh Road (B1122)? (Answer) Yes or No (plus free text if required).*  
 A totally unbalanced question with blatantly obvious overemphasis on the visual impact on the AONB. And Question 6 was the only Feedback Form question referring to preferred choice of substation location!
- Informal enquiry suggests that the level of understanding of electrical power generation and transmission equipment amongst the general public is insufficient for most residents to properly understand what the project entailed and even now those with some expert knowledge are having to dig hard into dense documentation to expose the realities of what is proposed. SPR should have undertaken far more extensive resident introduction and education before expecting serious consultation feedback. Failure to do this fatally flaws such responses as have been received and which SPR are trying to rely on.
- No photo montages of other landscape visualisations of each of the seven sites were provided during the site selection process to allow a realistic evaluation of the substation impact on each of the seven zones. Were residents expected to use their imagination in assessing impact? This is totally unprofessional on such a large project, and even on a small one, by modern standards.
- The Red Amber Green (RAG) Assessment methodology as presented to the communities is itself a flawed method for decision making. For each of the seven potential Substation sites one of those colours was assigned to each of 23 totally unrelated characteristics (such as Proximity to AONB, Highway Access, Proximity to overhead transmission lines, Visual Sensitivity) and finally a total score of Reds,

Ambers and Greens taken as an objective assessment of that site's relative merit, but without first assigning an objective relative weighting to each characteristic.

- The RAG assessment upon which SPR places so much reliance was shown to Parish Meetings for Aldringham-cum-Thorpe, Knodishall and Friston in such poor resolution as to be incapable of interpretation and no background or explanation was given of the criteria applied and why the Friston site has been selected, other than the totals of Red, Amber and Green measures. No meaningful debate was allowed.
- SPR have refused on more than one occasion to provide critical background information to their RAG assessment of the seven sites, which they had stated to be fundamental to their site selection process. Even such information as has reluctantly been revealed after intense pressure is ambiguous and unclear with questions unanswered. E.g. is the RAG rating for landscape visual impact for the Friston site before or after mitigation, and if after, with what level of mitigation? This question couldn't be answered at a recent meeting with an SPR Director accompanied by the project Stakeholder Manager.
- It is clear from desk-based examination of the RAG chart (itself obtained only after pressure) that a site selection outcome is extremely sensitive to even minor changes in the evaluation of elements and to suggest that the RAG chart can be relied on as the key selector is not justified, but no additional information on site suitability criteria has ever been provided.
- Residents throughout the Indicative Search Area believe that there are much more suitable sites available than that at Friston, and in particular those at or near to the Sizewell power station site and in any case near the coast. This position is supported by the leaders of both Suffolk County Council, Suffolk Coastal District Council, as well as our local MP, Dr Therese Coffey.

It is appreciated that some of these sites are close to, or in, the AONB, but these sites cannot be judged as beautiful, and certainly not Outstandingly Beautiful, and the view of the Suffolk Preservation Society is that the damage to the landscape quality of the Friston site would greatly outweigh that to a site close to Sizewell, albeit in the AONB.

Residents are therefore highly critical of SPR's refusal to even consider selection of a site within the AONB. SPR claim that there are not the requisite 'exceptional circumstances' in place but the willingness of the planning authorities to allow the construction of other substations, and potentially a huge new power station at Sizewell, makes a mockery of such an assertion.

## Conclusions

There are numerous other issues that can be raised regarding the so-called Consultation, including Cumulative Impact of the proposed NGV substations that SPR claim to be undertaking and further details can be provided on request, but we believe that the above provides more than sufficient justification for the current Consultation process to be halted.

Consultation should only be restarted after agreement with residents to open sharing of information and meaningful consideration of their concerns, including the preference to site the necessary substations nearer to the coast.

15(vi)

We have previously been advised that PINS may be able to offer 'Outreach' services to provide local professional assistance to projects which are in serious difficulty, such as this one, and we would be open to consideration of proposals from you for this.

Please note that this letter has been written without the benefit of professional advice and we reserve the right to make further challenges to the consultation process.

We look forward to your early response.

Yours faithfully

Chris Wheeler

On behalf of Substation Action/Save East Suffolk

**Distribution:**

Iberdrola – Samantha Barber (non-executive director responsible for Corporate Responsibility)

Scottish Power/Iberdrola Renewables – Jonathan Cole, Managing Director

Scottish Power Renewables- David Walker, On-Shore Development Director

Dr Therese Coffey MP

The Rt. Hon. John Gummer PC, the Lord Deben

Suffolk County Council – Cllr. Andrew Reid

Suffolk County Council – Cllr. Russ Rainger

Suffolk County Council – John Pitchford (Principal Planning Officer)

Suffolk Coastal District Council – Cllr. Maureen Jones

Suffolk Coastal District Council – Lisa Chandler (Senior Planning Officer)

Parish Clerks of: Friston, Knodishall, Benhall, Sternfield and Aldringham-cum-Thorpe

Town Clerks of: Leiston and Aldeburgh

## **Annex 16**

**Email from SPR to Mary Shipman  
regarding the RAG Assessment for the  
NG Substation  
8 November 2018**



**Subject:** RE: Phase 3.5 Consultation -EA1N & EA2  
**Date:** Thursday, 8 November 2018 at 17:20:53 Greenwich Mean Time  
**From:** East Anglia ONE North  
**To:** Mary Shipman

Dear Ms Shipman

Apologies for the confusion.

The RAG Assessment Methodology it refers to is the correct document. This is an error with not re-labelling in the cross over of documentation.

The LVIA will be available at Phase 4 Consultation.

There has been a RAG Assessment carried out for the National Grid substation, however this is not our document to publish currently. However it will be available at Phase 4 Consultation.

I hope this answers your questions.

**Best Wishes**

East Anglia TWO and ONE North Stakeholder Management Team  
[eastangliatwo@scottishpower.com](mailto:eastangliatwo@scottishpower.com)  
[eastangliaonenorth@scottishpower.com](mailto:eastangliaonenorth@scottishpower.com)



**P** Before printing this message, make sure it's necessary.  
 The environment is in our hand

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**From:** Mary Shipman [mailto: [REDACTED]]  
**Sent:** 05 November 2018 11:19  
**To:** East Anglia Two  
**Cc:** Snell, Katie  
**Subject:** Re: Phase 3.5 Consultation -EA1N & EA2

Dear Sir or Madam

I have received your email dated 2 November below. Unfortunately you have not answered my questions fully and correctly. I repeat these again:-

- I asked for Revision B explaining the RAG Assessment in the landscape section. You have simply provided Revision A again, which is already on your website. Please would you provide Revision B. I can also see from your Site Selection information of May 2018 that SPR have also undertaken a high level landscape and visual impact assessment (LVIA) and could you also please provide a copy of this.
- I asked for confirmation that the RAG assessment only refers to EA1N and EA2 (I.e. not including the NG substation). The information in SPR's RAG Assessment Methodology states the following:-

Comparison between similar sites (optimal locations), assessed separately 2 x ScottishPower

## **Annex 17**

**Extract from National Grid's  
"Briefing Pack for the Nautilus  
Interconnector"  
July 2019**

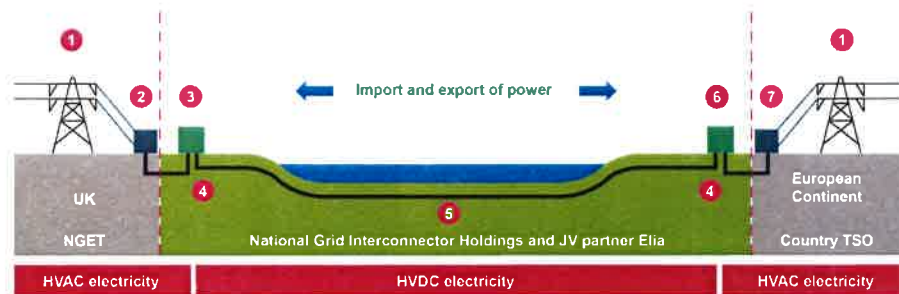
# Nautilus Interconnector

National Grid Interconnector Holdings is proposing to develop Nautilus, a second Interconnector between Belgium and Great Britain, to provide a 1.4 GW HVDC electricity link between the two countries.

Electricity provided by Nautilus will be transported under the North Sea via underground subsea cables which will be buried onshore at a point known as 'landfall' before connecting into an onshore converter station and the national grid. Potential high level cable route options and various landfalls along the East Suffolk Coast are currently being assessed for Nautilus.

In order to connect Nautilus to the national grid, discussions have been ongoing with National Grid Electricity Transmission (NGET) and the System Operator. From this, NGET have provided a Connection Agreement to use a new 400 kilovolts (kV) substation provisionally referred to as "Leiston 400kV substation". This is the same substation that Scottish Power Renewables (SPR) offshore windfarms East Anglia 1N and 2 are proposed to be linked to. NGIH, SPR and NGET are currently working on the premise that all projects will be connecting to the same substation – "Leiston 400kV substation".

Nautilus is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision is planned for 2024. Following this, construction will commence, and the project could be operational by 2028.



HVAC = High Voltage Alternating Current    HVDC = High Voltage Direct Current    TSO = Transmission System Operator

- 1. Existing network
- 2. NGET onshore substation
- 3. National Grid Interconnectors onshore converter station
- 4. Underground HVAC/HVDC cables
- 5. Subsea HVDC cables
- 6. Elia onshore converter station
- 7. Belgian transmission network substation

## Design

The design for the converter station has not yet been developed. A typical operational footprint for a converter station covers an area of five hectares (12 acres) with a maximum height of 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

The business is constantly challenging its supply chain to bring down the size of converters. The final design of the converter station will be developed through a thorough consultation process with stakeholders and the local community, as well as through collaboration with the supply chain.

## Key benefits



Enough power for  
1.4 million homes



1.4 gigawatts (GW)  
of secure, sustainable energy for  
British consumers



More Interconnectors help  
the transition to a  
zero carbon future

## **Annex 18**

**SPR's Action List following its meeting  
with SASES/Friston Parish Council on  
12 July 2019**



Actions / Description	Responsible
<p><b>ACTION:</b> Michael Mahoney asked that the visualisations include a 1, 5, 10, 15 year points.            SPR - This is not standard practise and so will not be included. The scope of the Landscape and Visual Impact Assessment has already been agreed.</p>	<p>SPR</p>
<p><b>ACTION:</b> Michael Mahony asked if details of how the planting would be maintained could be made available now.            SPR - The same requirement as is in the EA ONE and EA THREE DCOs re: maintaining planting, will go into these DCOs.</p>	<p>SPR</p>
<p><b>ACTION:</b> Michael Mahony pointed out that he owned one of the fields on the map. He was advised that this was a matter for him and the land team.</p>	<p>MM/SPR</p>
<p><b>ACTION:</b> Mary Shipman asked if SASES could have a meeting with SPR to walk around the village to look at flood areas.            SPR: This is likely to take place at the discharge of condition stage</p>	<p>SPR</p>
<p><b>ACTION:</b> Mary Shipman advised that we contact flood risk expert Matt Williamson            SPR – Thank you for providing this detail.</p>	<p>SPR</p>
<p><b>ACTION:</b> Chris Wheeler asked if the decibel level during construction would be reduced? SPR to check noise levels.            SPR – Noted.</p>	<p>SPR</p>
<p><b>ACTION:</b> SASES asked for noise contours. AH said would check to see if these could be included.            SPR - We can include these.</p>	<p>SPR</p>
<p><b>ACTION:</b> Chris Wheeler said that listed buildings had not been included in the assessment. Asked SPR to take that away.            SPR – Listed buildings have been included for the final application.</p>	<p>SPR</p>
<p><b>ACTION:</b> Chris Wheeler asked for a tonal penalty that complied with BS1412 be included.            SPR – This is not required. Information will be provided in the Environmental Statement.</p>	<p>SPR</p>
<p><b>ACTION:</b> Bill Halford asked if SPR could provide noise contours along the cable route and the mitigation as well.            SPR – No, this is not a requirement.</p>	<p>SPR</p>
<p><b>ACTION:</b> Andrew Reid asked for a comparison with the working width/cable corridor for EA1.            SPR - EA ONE – 75m order limits – 55m swathe            EA TWO and ONE North - 70m order limits – 32m swathe</p>	<p>SPR</p>