



 The Planning Inspectorate

East Anglia ONE North East Anglia TWO

A Report of procedural submissions from parties attending the
Preliminary Meeting





Contents

Marianne Fellowes on behalf of Aldeburgh Town Council.....	1
Charles Courage	4
The Applicant	5
Mrs Patricia Dorcey	7
Naomi Goold on behalf of East Suffolk Council	7
Graham Gunby on behalf of Suffolk County Council.....	9
Paul Chandler on behalf of Save Our Sandlings	9
Richard Turney on behalf of Substation Action Save East Suffolk (SASES).....	9
Sarah Courage	11



Marianne Fellowes on behalf of Aldeburgh Town Council

Interested in: Both Applications

Agenda Items 2 & 3

These comments relate to both applications, and to Item 2 and Item 3:

The process is not 'very similar' to face to face as total number of lines/links is limited. How will the Planning Inspector understand the breadth and volume of feeling or concern if people are not participating freely.

Sections of local community will be disadvantaged or even put off from applying to speak - whereas the applicant has advantage of unlimited IT resources/levels of confidence.. ATC Councillors have not been able to meet/gather to prepare and collect views of constituent's and we have been diverted to Covid-19 projects and support needs so the prep has also not been 'very similar'.

PINs has said that its important to 'raise matters at earliest relevant point' but the three stage process may mean some matters are not raised until the written stage 2. with individuals not aware of others' points or able to be inspired by others' comments. Planning guidance is that 'citizens should have the information required to participate meaningfully in the process'. Even this process of trying to identify what we want to raise is difficult in this isolated format.

Both the Prelim Hearings and the Examination Hearings should be postponed until they can be held in person, the Gov has indicated that Conferences can be held after 1st October - so why favour the applicant by pushing ahead virtually in this way. The imminent Review of the way the offshore transition network is designed and delivered should mean this process is halted, especially because if approved it will lead to a large number of future energy projects also being located 5km from the substation site - so it is important that this is post review.

Why is the applicant able to reply to any representation made - should the Planning Inspectorate not 'hear' the perceived or actual concerns and the applicant be asked to submit its responses for consideration in writing - it will be very daunting/unfair to know the applicant will respond immediately and potentially defensively.

Agenda Item 4

These comments relate to both applications:

Should two applicants (EA!N Ltd and EA2 Ltd) be allowed to apply via one DCO? The presumption is that one would not be approved without the other - there is no mention of separate decisions and the impact on the need, design/capacity of a substation and onshore infrastructure if one application is not approved?

Why is the National Grid not regarded as the applicant as it is their offering of a connection to the grid which is driving these applications (especially at 6. and 16) in this location. This should be a principle assessment in its own right.



Construction (4) needs to also include significant traffic impact on wider area both worker and materials coming from North, South and West.

Land Use (10) should value land for not just recreation but general health and wellbeing (quiet lanes, open spaces, wildlife habitats, AONB etc) as well as inspiration for artists and musicians - a sense of place.

Cumulative impact (2, 11, 15 and 17) should list all those that we have been told will follow if the substation in this location is approved, not just those already in the PINS process. So this means: Nautilus National Grid Ventures, Eurolink NGV, SCD1 and SCD2 links from Sizewell south, Greater Gabbard Windfarm extension and Galloper Windfarm extension - all due into the same area between 2021 and 2035 as well as Sizewell C. This over industrialization should not begin with one isolated DCO.

Human health (14) should also include mental health and well-being, and the impact on the tourism industry.

(18) should not just be landscape and visual, there is a huge impact on tourism of traffic issues, perceived and actual disruption, fly parking, irreparable loss of wildlife.

Agenda Item 6

These comments apply to both applications:

The whole timetable should be adjusted/delayed to take into account the Review of the design and delivery of offshore wind farms, and its findings. The principle is that offshore developments should not cause considerable, irreparable damage to coastal communities and the environment. The Review is needed to ensure this principle.

Agenda Item 7

These comments apply to both applications:

The whole timetable should be adjusted/delayed to take into account the Review of the design and delivery of offshore wind farms, and its findings. The principle is that offshore developments should not cause considerable, irreparable damage to coastal communities and the environment. The Review is needed to ensure this principle.

It is impossible to know if the deadlines are appropriate when we do not know the extent or volume of the information as written procedural requests are being done as part of this response. This should not be determined at the time of the Prelim Hearing but as the process evolves. There is a wealth of information from previous NSIP DCO applications when Hearings were held in public, but not for Hearings held virtually. It is not possible to know how timelines will progress, or if technical problems will cause delays.

Agenda Item 8

These comments apply to both applications:



Accompanied site inspections should be held before the Prelim Hearings, as these will inform the process. They should also be undertaken at all times of the growing/wildlife season and at the peak of tourism - so not wait until the scheduled time. Prelim Hearings should be postponed until accompanied site inspections have been conducted.

ATC would ask that a specific issue hearing is conducted on the role of National Grid and the misguided principle of the siting of connections away from urban areas of high demand, the lack of investment in new more appropriate connection points, the total lack of transparency (they did not consult with ATC or the public).

ATC would ask that a specific issue hearing is conducted on the principle of reducing onshore infrastructure through maximization of strategic planning, future proofing and off shore infrastructure.

Additional time should be set aside for OFH because of the limited access due to the virtual setting, and all avenues should be explored to enable the maximum number of members of the public to be involved. Will the applicant and statutory agencies be also asked to 'share' or limit their involvement to free up lines and connections for others?

Agenda Item 9

These comments apply to both applications:

Examination of existing projects which were either not future proofed or were changed by the applicant at the time to reduce costs and the potential for these to be extended rather than new DCO applications. For example existing links from EU or from other offshore windfarms which could be expanded.

Lack of Government strategy and why competing applicants cannot be required to work together in shared infrastructure. If is it in the national interest then a national solution is needed.

How local communities will be compensated should this application be approved so that the harm does not outweigh the benefit gained. If this cannot be achieved, how can the application be examined?

Is there anything else

It would be helpful if a Town or Parish Council could have a flexible approach to which Councillor spoke to which item rather than just one person potentially, and that a member of our office team could also attend/have a link to assist.

There does not seem to be a true understanding of the impact of Covid-19 on Town and Parish councils and individual members of the public. We all responded to your consultation saying not to go ahead with virtual hearings and it feels as if there was nothing that we could have said that would have changed your mind.

Maslow Hierarchy of Needs clearly proves that when individuals or an organisation is dealing with basic elements (food, water, shelter) they cannot progress onto 'higher' actualisation of public



service, representing others, taking part in consultations etc. and planning for the future if worried about day to day. life or death matters.

The format of this form is not conducive to capturing your responses to share with those you are representing. You also have to do the whole document before it is clear what comments to include where. A full copy of the document would have been helpful if it was available to consider prior to starting to complete, as well as a completed copy at the end.... for example how will I know remember what I have completed to then ask about at the Preliminary Hearings?? There is a complete disconnection between PINS and the community and local government that this was not considered and enabled. You are going to capture my responses to be shared later so why not include an option to save by the person completing.

Did PINs do any consultation with potential users before creating and making live the previous document we had to fill out on-line (consultation regarding whether Hearings should be virtual) or this one? And if not, why not?

Has PINs asked a stakeholder to be involved in the planning of these virtual events (prior to going out to consultation) and if not, why not? Even the language you use can be difficult for non-planners.

Who was involved in the selection of the panel? The membership of the panel is dominated by Planning experts, there appears to be (in their CV) no representation from those who understand socio-economic impact or impact on physical and mental health/well-being these applications and their decisions cause....or this may be within their experience and it would have been nice to have had this reassurance.

Charles Courage

Interested in: Both Applications

Agenda Items 2 & 3

I have questions regarding the whole process that I would like the planning inspectorate to answer.

You have taken form filling to the ultimate degree so much so that those wishing to object will eventually be ground down and will, therefore, be unwilling to object.

Agenda Item 4

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Agenda Item 5

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Agenda Item 6

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Agenda Item 7

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Agenda Item 9

I have questions regarding the whole process that I would like the planning inspectorate to answer.

You have taken form filling to the ultimate degree so much so that those wishing to object will eventually be ground down and will, therefore, be unwilling to object.

Is there anything else

[Redacted text block]

The Applicant

Interested in: Both Applications

Agenda Items 2 & 3

As a representative of the Applicant, we would like to reserve the right to respond on any procedural matters that might be raised during these Agenda items.

Agenda Item 4

As a representative of the Applicant, we would like to reserve the right to respond on or clarify any topic that might be raised during this Agenda Item 4.

Agenda Item 5

As a representative of the Applicant, we would also like to reserve the right to respond on or clarify any topic that might be raised during this Agenda Item 5.



Agenda Item 6

As a representative of the Applicant, we would also like to reserve the right to respond on or clarify any topic that might be raised during this Agenda Item 6.

Agenda Item 7

We would like to discuss the Applicant's procedural request in relation to this item that has been submitted to the Planning Inspectorate in writing for Procedural Deadline A. As a representative of the Applicant, we would also like to reserve the right to respond on or clarify any matter that might be raised during this Agenda Item 7.

Agenda Item 8

As a representative of the Applicant, we would like to reserve the right to respond on or clarify any matter that might be raised during this Agenda Item 8.

Agenda Item 9

As a representative of the Applicant, we would like to reserve the right to respond on or clarify any matter that might be raised during this Agenda Item 9.

Supporting documents to be submitted? I will be submitting one or more supporting documents (.pdf files) by email



Mrs Patricia Dorcey

Interested in: Both Applications

Agenda Item 9

I would like to make another procedural submission or request.

Naomi Gould on behalf of East Suffolk Council

Interested in: Both Applications

Agenda Items 2 & 3

Agenda Item 3 - Examination Process - Both applications

It is understood that the Examining Authority is trying to provide flexibility within examination timetable but it would be useful to understand how far in advance of the various weeks reserved for Issue Specific Hearings Interested Parties will be advised of the dates and times of the hearings and topics to be discussed. It is understood that agendas will be available five working days in advanced, but it is assumed that information on the dates, times and topics would be available in advance of this? The provision of this information as early as possible is requested so that the Council can ensure we have appropriate representation including the relevant technical officers available and they have sufficient time to prepare for the event. This is particularly important given the submission of the Sizewell C Development Consent Order, in addition to this, technical officers are also involved in multiple other projects including providing pre-application advice on other National Significant Infrastructure Projects.

Agenda Item 4

Agenda Item 4 - Initial Assessment of Principal Issues - Both applications

As the effects of construction and operational noise on human receptors is a concern for the local authority and local community, please can clarification be provided as to where this issue will be covered within the list of principal issues?

Please could clarification also be provided as to where the effects on public rights of way will be covered?

Agenda Item 6

Agenda Item 6 - Timetable provisions - Both applications

No specific comments at this stage but the Council would like the opportunity to respond to any changes to the timetable proposed.

Agenda Item 7

Agenda Item 7 - Deadlines - Both applications



The Sizewell C DCO application has been submitted and accepted by the Planning Inspectorate; the period provided to register as an Interested Party will close on 30 September 2020. It is of vital importance that the interaction and any potential overlap between the two examinations is taken into consideration during the timetabling by both Examining Authorities given the significant implications this will have on the Council's resources.

At deadline 1 it is set out that Interested Parties must provide notification of the wish to speak at any further Issue Specific Hearing. Will the Examining Authority provide information prior to this date regarding dates and times for the hearings and topic matters to be discussed to enable an informed view to be taken on future attendance? Receipt of this information as early as possible will assist the local authority in managing their resources.

It is likely that the local authority will be legally represented in relation to certain topic areas including:

- Landscape and visual effects
- Onshore historic environment
- Operational and construction noise
- Air quality
- Traffic and Transport
- Flood Risk
- Public Rights of Way
- Cumulative impacts including existing connection offers
- Draft Development Consent Order

We have difficulties regarding availability during the week commencing 30 November 2020 and hoped that there would be scope to move these hearings to the following week (commencing 7 December 2020)? We have specific difficulty resourcing representation for any hearings which would be related to the above topic matters set out above.

Deadline 4 is on 7 January with the weeks commencing 11 January and 18 January 2021 reserved for hearings (ISHs, CAHs or OFHs). There is limited time available following the Christmas break to respond to information published at deadline 3 and prepare for potential hearings during the second week in January. When is it likely to be known whether these hearings will be needed, what they will be utilised for and any more specific information regarding times, dates and topics? Due to the difficulty the local authority will have due to the limited preparation time available for technical officers and we have also been made aware that the Council's legal representation will not be available, we are concerned the deadline remains as set and Issue Specific Hearings occur during the period identified the local authority may not be able to have appropriate resources available to fully participate in the events. Would it be possible to move Deadline 4 back to provide some additional time after Christmas and move any onshore Issue Specific Hearings related the topic previously outlined back to February?



Notwithstanding the above comments, dependent on whether the entire week prior to deadline 5 is utilised for hearings this, the deadline of Wednesday 27 January 2021 would not provide very long for summaries of oral cases provided during the hearings to be documented. Could this deadline be closer to the end of that week? Please note if the dates of the Issue Specific Hearings change this comment will no longer be relevant.

Is there anything else

The Sizewell C DCO application has been submitted and accepted by the Planning Inspectorate; the period provided to register as an Interested Party will close on 30 September 2020. It is of vital importance that the interaction and any potential overlap between the two examinations is taken into consideration during the timetabling by both Examining Authorities given the significant implications this will have on the Council's resources.

Graham Gunby on behalf of Suffolk County Council

Interest in: Both Applications

Is there anything else:

At the time of writing it is the intention that both Suffolk County Council and East Suffolk Council will be jointly represented by Isabella Tafur of FTB chambers. Her email address is:



Please assume that she will want to speak.

Paul Chandler on behalf of Save Our Sandlings

Interested in: Both Applications

Agenda Item 8

I request the Accompanied Site Inspections dates are brought forward to late summer or earlier so as to avoid winter visits. A winter visit will not offer a fair review of the range and diversity of bird and wildlife, not the extent of summer footpath traffic.

Is there anything else

Please consider some form of socially distanced live meeting. Many local residents are unfamiliar or do not have sufficient IT skills to take part in the examination process. In an ideal world the applications would be put on hold indefinitely until Covid-19 restrictions are eased sufficiently to allow personal attendance of all parties

Richard Turney on behalf of Substation Action Save East Suffolk (SASES)

Interested in: Both Applications

Agenda Items 2 & 3

EA1N & EA2



SASES wish to comment on and ask for the Examining Authorities' views on the impact on the examinations timetables of:

- the Offshore Transmission Network Review announced by BEIS on 15 July 2020; and
- the implications of the appropriate assessment in respect of the Hornsea Three DCO.

Agenda Item 4

EA1N & EA2

The references below are to the issues as numbered in the Examining Authorities' Initial Assessments of Principal Issues.

Issue 2 - a further sub-issue should be included to address (a) IROPI and (b) the need for and adequacy of any compensatory measures, particularly in light of the Secretary of State's "minded to" decision on Hornsea Three.

Issue 6 - the third sub issue should be expanded to include the implications of the BEIS Offshore Transmission Network Review as referred to in section 11 above.

Issue 7 - cumulative effects should be considered in the context of the adequacy of the Environmental Statement.

Issue 15 - the interface with other offshore energy projects should be specifically identified under this issue, namely NGV's Nautilus and Eurolink interconnector projects, the Greater Gabbard windfarm extension, the Galloper windfarm extension, National Grid's SCD1 and SCD2 interconnector projects.

Agenda Item 5

EA1N & EA2

SASES would wish to emphasise the need specifically to address the implications of the Hornsea Three appropriate assessment and the "minded to" decision.

Agenda Item 8

EA1N & EA2

SASES wish to make observations upon the following.

1. The need for ASIs in the Friston area and Aldringham.
2. With the exception of the new member of the Examining Authorities, the Examining Authorities have not conducted a site inspection during the summer months when the landscape looks very different compared to the middle of winter. Accordingly it is suggested that a site inspection should be conducted in the late summer/autumn.



3. On Issue Specific Hearings there is a clear and compelling need for hearings in respect of matters relating to onshore impacts to ensure the adequate examination of the relevant issues and so that interested parties have a fair chance to put their case.

4. It is necessary to hold issue specific hearings in respect of the impacts of the proposed developments particularly in the Friston area (as well as along the cable route) and proposed mitigation measures in respect of those impacts.

5. Separately, hearings should be held in relation to the grid connection location and substation site in respect of:

- site selection
- alternatives
- interrelationships with other projects
- cumulative impacts,

and for these hearings, National Grid and the developers of other projects should be invited to participate.

6. The need for hearings to be held in relation to the draft Development Consent Order, as identified by the Examining Authorities on page B9 of the Rule 6 letter dated 16 July 2020.

Sarah Courage

Interested in: Both Applications

Agenda Items 2 & 3

I have many questions and do not find this system helpful.

Agenda Item 4

I need a proper open meeting not a virtual system.

Agenda Item 5

It is disgraceful of the the Planning Inspectorate to be conducting this major issue in such an opaque fashion.

Agenda Item 6

I request that we revert to a proper meeting outside in a marquee to discuss this massive application.

Agenda Item 7

As above for both applications.

Agenda Item 8



As above.

Agenda Item 9

As above.

Supporting documents to be submitted? I will be submitting one or more supporting documents (.pdf files) by email



Annex A

Submissions received by Procedural Deadline A via email

1. Isaac Nunn on behalf of Suffolk County Council

Note:

- i. No additional submission was received by Sarah Courage by Procedural Deadline A.
- ii. The Applicants submission dated 13 August 2020 has been published to the National Infrastructure project page under Response to the Rule 6 Letter [AS-061]

1. Isaac Nunn on behalf of Suffolk County Council

From: [Isaac Nunn](#)
To: [East Anglia ONE North](#); [East Anglia Two](#)
Cc: [Naomi Goold](#); [Graham Gunby](#); [EAOW Project Mailbox](#); [James Cutting](#)
Subject: Preliminary Meeting Involvement: Supplementary Response
Date: 13 August 2020 16:54:58

REP. REF. 20023106 IN RESPECT OF EA1N PINS REF. EN010077

REP. REF. 20023105 IN RESPECT OF EA2 PINS REF. EN010078

Dear Sir/Madam,

Suffolk County Council has already submitted an online form answering about our intended involvement in the Preliminary Meeting. Please be advised that, following further deliberation, we wish to provide supplementary answers with regard to particular agenda items. These answers are aligned with responses submitted by our colleagues at East Suffolk Council.

Agenda Item 3 – Examination process

- Providing a flexible Examination programme
- The need to raise all matters at the earliest relevant point in Examination
- The relationship between this Examination and the Examination for East Anglia ONE North

It is understood that the Examining Authority is trying to provide flexibility within examination timetable but it would be useful to understand how far in advance of the various weeks reserved for Issue Specific Hearings Interested Parties will be advised of the dates and times of the hearings and topics to be discussed. It is understood that agendas will be available five working days in advanced, but it is assumed that information on the dates, times and topics would be available in advance of this? The provision of this information as early as possible is requested so that the Council can ensure we have appropriate representation including the relevant technical officers available and they have sufficient time to prepare for the event. This is particularly important given the submission of the Sizewell C Development Consent Order, in addition to this, technical officers are also involved in multiple other projects including providing pre-application advice on other National Significant Infrastructure Projects.

Agenda Item 4 – Initial Assessment of Principal Issues

- Aviation
- Biodiversity, Ecology and Natural Environment
- CA, TP and other Land or Rights Considerations
- Construction
- Draft DCO
- Electricity Connections, Infrastructure and Other Uses
- ES General
- Flood Risk, Water Quality and Resources
- Historic Environment
- Land Use
- Landscape and Visual Impact
- Marine and Coastal Physical Processes
- Marine Effects
- Nuisance and other Public Health Effects
- Other Projects and Proposals
- Project Description and Site Selection
- Seascape, Landscape and Visual Amenity
- Socio-Economic Effects
- Transportation and Traffic

As the effects of construction and operational noise on human receptors is a concern for the local authorities and local community, please can clarification be provided as to where this issue will be covered within the list of principal issues?

Please could clarification also be provided as to where the effects on public rights of way will be covered?

Agenda Item 6 – Timetable provisions for any:

- Non-material change to the application
- Material change to the application
- Processes for additional land or rights

No specific comments at this stage but the Council would like the opportunity to respond to any changes to the timetable proposed.

Agenda Item 7 – Deadlines for submission of:

- Written Representations
- Local Impact Reports
- Responses to the ExA's Written Questions
- Statements of Common Ground
- Notifications relating to hearings

The Sizewell C DCO application has been submitted and accepted by the Planning Inspectorate; the period provided to register as an Interested Party will close on 30 September 2020. It is of vital importance that the interaction and any potential overlap between the two examinations is taken into consideration during the timetabling by both Examining Authorities given the significant implications this will have on the Council's resources.

At deadline 1 it is set out that Interested Parties must provide notification of the wish to speak at any further Issue Specific Hearing. Will the Examining Authority provide information prior to this date regarding dates and times for the hearings and topic matters to be discussed to enable an informed view to be taken on future attendance? Receipt of this information as early as possible will assist the local authority in managing their resources.

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- *Air quality*
- *Traffic and Transport*
- *Flood Risk*
- *Public Rights of Way*
- *Cumulative impacts including existing connection offers*
- *Draft Development Consent Order*

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Notwithstanding the above comments, dependent on whether the entire week prior to deadline 5 is utilised for hearings this, the deadline of Wednesday 27 January 2021 would not provide very long for summaries of oral cases provided during the hearings to be documented. Could this deadline be closer to the end of that week? Please note if the dates of the Issue Specific Hearings change this comment will no longer be relevant.

If you have any questions about this representation please do not hesitate to get in touch.

Kind regards,

Isaac Nunn

Senior Planning Officer (Energy)
Growth, Highways & Infrastructure
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Tel: 01473 265248



 [Planning, waste and environment](#)

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