

2 September 2020

By Email Only

The Planning Inspectorate
National infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

EastAngliaOneNorth@planninginspectorate.gov.uk
EastAngliaTwo@planninginspectorate.gov.uk

Registration Identification No. (EA1N) - 20024106

Registration Identification No. (EA2) - 20024110

Dear Examining Authorities

Written submissions etc following Preliminary Meetings on Wednesday 16 September 2020

We thank the Examining Authorities for their time and consideration at the Preliminary Meeting.

We wish to make the following submissions responding to matters raised orally in this Meeting.

1. We support comments made by Councillor Marianne Fellows in respect of digital exclusion and the impact of the Covid 19 pandemic upon local residents. We understand she will be making further submissions on that issue.
2. On the matter of the BEIS Review the Applicants in their comments at the Preliminary Meeting conflated the two workstreams set out in the Terms of Reference of the Review. They focused on the long-term workstream which is designed to implement a new enduring regime rather than the medium-term workstream. We will not go into detail here as we expect that the underlying issues will be addressed in more detail later in the examinations, but would refer the Examining Authorities to the terms of reference for the medium-term workstream. This indicates the medium-term workstream is not about a long term enduring regime but issues to “facilitate coordination in the short to medium term”, to “explore early opportunities for coordination... considering regulatory flexibility to allow developers to test innovative approaches”. Furthermore these projects clearly fall within the timing set out in the terms of reference for the medium term workstream. Accordingly we welcome the Examining Authorities’ confirmation that matters relating to the Review will be “fully ventilated to the extent feasible” during the examinations. The issue is undoubtedly one which will be important and relevant to the Secretary of State’s consideration of these applications.
3. The Applicants also commented on the National Grid infrastructure and why the NSIP for this infrastructure had been included in the applications. Again we will not go into detail on this subject here as we expect that the issues will be addressed in more detail later in the examinations. For the moment we simply observe that the National Grid NSIP will not only enable the connection of EA1N and EA2 but also NGV’s Nautilus and Eurolink interconnector projects and almost certainly the Greater Gabbard and Galloper windfarm extension projects and National Grid’s SCD1 and SCD2 interconnector projects. The relationship between these projects and the current proposals should therefore be considered in these applications.

4. We welcome the Examining Authorities' confirmation that there will be issue specific hearings in relation to onshore matters (including, without limitation site selection, alternatives, the interrelationship with other projects, cumulative impacts, landscape, heritage, flooding, noise and the draft DCOs) and that SASES representatives will be invited to attend and speak at those hearings. Please note however that SASES may not be professionally represented in respect of all such matters. In terms of expert evidence this is currently limited to the topics of landscape, heritage, flooding and noise.
5. In respect of statements of common ground we have been in correspondence with Scottish Power on this subject as stated in the Preliminary Meeting. It expressed a wish to see our expert reports and written representations in draft form. We have stated that we would prefer first to submit our written representations including expert reports in final form at Deadline 1 and then use those as a basis for discussing areas of agreement. Further as noted above we have only instructed experts in the areas of landscape, heritage, flood risk and noise and accordingly we would prefer to engage in agreeing SoCGs with Scottish Power on those topics alone.
6. We would also wish to confirm that although Friston Parish Council support us (and adopted our relevant representations which were also supported by a significant number of residents) we do not currently formally represent them.
7. A number of submissions have been made relating to the proposed dates of deadlines and issue specific hearings. As we stated at the Preliminary Meeting any such changes may impact the availability of other parties and their representatives. Therefore we simply request that if any changes are made they will be fair to all parties. In particular moving issue specific hearings to the week of 7 December 2020 may cause issues with availability of some of our professional team.
8. Scottish Power made comments about site inspections taking place on a virtual basis. Obviously we cannot predict what restrictions may come into force to control the Covid 19 pandemic, but we would submit that by definition a virtual site inspection is not a site inspection. It is implicit that a physical inspection is required as that is the purpose of a site inspection. As we will be making clear in our written representations the images and photomontages which form part of the applications do not adequately reflect the landscape and other environmental impacts. These can only be properly appreciated by a physical inspection of the site and the surrounding area. We will be making requests for site inspections by Deadline 1.
9. We request the right to be heard orally at the Preliminary Meeting Part 2 on Tuesday, 6 October 2020, but our actual attendance and representation will be dependent upon the content of written submissions made by other parties.

Yours sincerely

Michael Mahony