



4 March 2021

By Email

Planning Inspectorate

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Dear Sir/Madam

SCOTTISH POWER – EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO

REFS – 20024254 & 20024255

Please find attached submissions in respect of the Applicants' and National Grid's Deadline 6 CAH2 submissions.

Yours faithfully

Michael Mahony

**EAST ANGLIA ONE NORTH OFFSHORE WINDFARM
EAST ANGLIA TWO OFFSHORE WINDFARM**



**DEADLINE 7 – SUBMISSIONS BY
MICHAEL MAHONY [REDACTED] IN RESPECT OF THE APPLICANTS
AND NATIONAL GRIDS DEADLINE 6 SUBMISSIONS FOLLOWING CAH2**

INTRODUCTION

1. In this submission I have raised a number of specific points of detail. I have not sought to repeat the content of the submissions I made at Deadline 6. I maintain the position set out in such submissions.

APPLICANTS’ RESPONSE TO CAH2 ACTION POINTS

2. ID 5 – whilst some degree of clarification has been provided which is helpful, there still remain a number of areas whether position is either unclear or unsatisfactory.

Plot 116

3. Whilst the clarification that there is no requirement to remove hedgerows along the eastern boundary of plot 116 is welcomed the necessity to access the triangular area to the south-west of plot 116 remains disputed.
4. Furthermore there is a reference to the “*removal along the southern boundary for access/visibility*” between plot 116 and 119. I was assured that there will be no need to access plot 116 from the Saxmundham Road and I do not believe this has been identified as an access point for the onshore works and it does not feature in the related travel plans, in part no doubt as it would involve construction traffic travelling along the B1121 either from Friston or Sternfield. It must be confirmed that no access will be required to plot 116 or plot 115 from the Saxmundham Road. All access should be from the substations construction site.
5. Plots 116 and 119 are not adjacent, they are either side of the Saxmundham Road with plot 117A in between. My understanding is that the requirement is to erect scaffolding beneath the pylons lines to protect the Saxmundham Road whilst the pylon works are being conducted in the north east of plot 116. Such scaffolding by obvious necessity will need to be several metres or more above the Saxmundham Road and therefore there should be no need to remove or otherwise interfere with the hedgerow.

Plots 117 and 126

6. It is welcomed that this is for maintenance purposes only but it should be expressly stated that maintenance will not involve removal of the hedgerow. Further it should be clarified that plot 117 includes plot 117A.

Plots 127 and 128

7. The references here should be to plots 128 and 129.

SUMMARY OF NATIONAL GRIDS ORAL CASE

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004179-NGET%20CA2%20Post%20Hearing%20Submission%20Document%2024.02.21\(210054823.1\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-004179-NGET%20CA2%20Post%20Hearing%20Submission%20Document%2024.02.21(210054823.1).pdf)

Plot 116

8. Whilst the nature of the works is understood NGET has still not justified the size/width of plot 116.
9. The intersection of (i) boundary of the agricultural land and the residential land and (ii) the Saxmundham Road is more than 50 metres from the northern ZX 022 line which is the closest line to this intersection. Given the distances/widths set out on page 3 of the NGET summary encroaching on any part of the residential land (referred to as the triangle) is not justified. It is stated that the OHL (overhead line) requires a “60m corridor with (30 m from the route centre line)”. Therefore it would appear that the north western boundary of plot 116 should be some 20m or more away from this intersection. Plot 116 is 310 m wide at its widest point. There is no justification for seeking temporary possession of such a large tracts of land based on the figures provided by NGET.
10. NGET states that “*the extent of land subject to work 43 and temporary possession powers is also wider than the OHL limits of deviation to allow for flexibility over access routes to NGET apparatus*”. This imprecise statement does not provide an adequate basis for demanding temporary possession of such a wide swathe of land or encroaching on residential property.
11. Generally it is highly unsatisfactory at this late stage of the examination process, and despite raising issues over the extent of land required over an extended period, NGET are still unable to provide specific details.

Plot 115

12. The reference to the temporary storage is noted. It is assumed that this storage will only be required for the purposes of the works to be conducted on my land and not for the purposes of works elsewhere. An undertaking to that effect would be required.

Plots 114/128/129

13. The Applicants have not addressed these points. In particular it noted that no statement is made concerning plot 114. Without prejudice to the fact that there is no justification for the compulsory acquisition of plot 114 in any event, there can no longer be any such justification as the operational access road can be moved further to the east given the reduction in size of the Scottish Power substations.

Why are DCO powers required when there are existing easements?

14. Temporary possession powers and easements are being conflated. Once the works are complete there does not seem to be any justification for the scope of the rights being sought being any wider than the terms of the existing easement. The only amendments required to the existing easement is in relation to the geographical location of the replaced ZX021 tower and the line which will run to the north east of it.
15. The fact that something is the “very standard ” does not mean that that approach is correct in all circumstances. It is the starting point for assessing what is justified not the end point.