

**From:** [REDACTED]  
**To:** [East Anglia ONE North](#); [East Anglia Two](#)  
**Cc:** [REDACTED]  
**Subject:** Invitation from the Secretary of State ( BEIS) to comment on East Anglia One North, East Anglia Two as set out in letter of 20 December 2021.  
**Date:** 31 January 2022 19:55:50

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**Personal Reference: EA1N: IP. 20024031. AFP . 132.  
EA2: IP. 20024032. AFP. 0134.**

**( These remarks should be considered in respect of both East Anglia One North and East Anglia Two.)**

**From:**  
**Tessa Wojtczak.**

**To:**  
**The Secretary of State ( Business, Energy and Industrial Strategy) , the Rt Hon Mr Kwasi Kwarteng MP.**

**Subject:**  
**Invitation from the Secretary of State to comment on Scottish Power Renewables' East Anglia One North and East Anglia Two proposed windfarms.**

1. On 20 December 2021 the Secretary of State issued a consultation letter inviting further information from the Applicants, Scottish Power Renewables, in respect of their proposed East Anglia One North ( EA1N) and East Anglia Two ( EA2) windfarms, as well as further comments from Interested Parties.

2. According to thst letter, adequate information and/ or updates have yet to be been supplied by the Promotors on the topics of Offshore Ornithology, including matters pertaining to Great Crested Newts and Badgers ( species protected by law), other aspects pertaining to their Outline Landscape and Ecological Management Strategy, and very significantly, Flood Risk.

3. On 2nd November 2021 the Secretary of State had made an earlier request for supplementary information on the important matter of Flood Risk, as well as other matters. It would appear that the Promotors' responses to that earlier request have failed to satisfy the Secretary of State's requests, and that elements of their legally prepared documents addressing Environmental, Habitat and Offshore matters are not standing scrutiny. .

4. These requests for additional/ supplementary information are made despite the fact that the Promotors had already been provided with an extra 3 months within

the Examination period to clarify and substantiate their case before the Planning Inspectorate, affording them an unusually extended 9 month period to present a case referred to from the beginning as “robust “ and ” compelling”.

5. Such omissions are particularly disturbing in respect of flooding at Friston, the proposed Substation site, and the unaddressed question of Cumulative Impact and the impact on Flood Risk of the multiple projects that are planned to follow, now that we understand the Government’s intention appears to transform this region into the largest complex of industrial scale energy in the UK.

**Cumulative Impact:**  
**Flood Risk.**

6. Recently plans for the Sea Link Interconnector were announced. This brings to **five** the number of confirmed energy projects planned to connect to the Grid in t’he Leiston area: “

Sea Link Interconnector  
East Anglia One North Offshore Wind Farm  
East Anglia Two Offshore Wind Farm  
Nautilus Interconnector  
Eurolink Interconnector.

7. Likely to follow are:

SCD2 Interconnector  
North Falls Offshore Wind Farm  
Five Estuaries Windfarm

8. Additionally , Sizewell C, despite not yet being consented, appears to be the beneficiary of Governmental Financial Planning in advance.

9. In addition to the vast ( over 100 acres) scale of the proposed Substation site at Friston, it is clear from National Grid Ventures’ Consultation of September 2021 that five new Substation sites are being proposed as options for future projects.

10. Consequently additional communities, Theberton, Kelsale, Snape, Sternfield, Saxmundham, Sternfield and Leiston are becoming aware of how their communities, and in many cases livelihoods, are at risk, and are considering strategies to make the force of their feeling heard that will have weight with the present government.

11. The scope of this scale of industrialisation is overwhelming, and appears to have been recognised to some degree in the Planning and proposed strategies discussed today, 31 January, in the online OTNR Webinar.

12. However, to date there is **no comprehensive Cumulative Impact Assessment** addressing the scale of these energy projects within the Examination. Such an assessment should be honest, robust, accurate and comprehensive in order to fulfil its true legal function; and yet SPR have not moved on this point **despite repeated requests from the Examining Authority to do so**. repeatedly claiming that insufficient information existed within the public domain. This is not in good faith; it does not address the Promotors' responsibilities to the legal requirements of the Examination or to the stakeholders and communities with whom it claims to conduct proper consultation ( another legal requirement. )

13. I and others have referred to the additional risk posed to local Hydrogeology and Groundwater by these intrusive works, significantly the extensive aquifer that underlies this region and provides potable water supplies to many households, addressed at some length in my last reply to the Secretary of State's request for further information.

14. In that submission I made reference to Wardens Trust for groups with protected characteristics sited on land directly adjacent to the proposed Landfall site and Cable Corridor route for EA1N; and EA2 ( and also potentially National Grid Nautilus) and Wardens reliance on that aquifer.

15. I would ask again if ScottishPower Renewables have provided an adequate **Equalities Impact Assessment** within the Examination, again a legal requirement, in which evidence and involvement from relevant protected groups has been sought, and the results of their findings addressed. I am not aware that any such document exists. If not, the scope of their engagement does not fulfil their responsibilities, and I would ask that this is considered in the context of their Public Sector Equality Duty requirements.

16. The Secretary of State may recognise that if there are significant issues still unresolved as to Flood Risk, and risk to local Hydrogeology and groundwater systems within these Examinations, the potential consequences when all subsequent projects seek to establish themselves on the same terrain are unimaginable. The Applicants seem not to consider this a matter for them; and yet the issue still stands.

**Cumulative Impact: Tourism and Local Economy.**

17. In common with so many, **Simon Grey, Executive Director of Policy and External Affairs at the East of England Energy Group (EEEGR)** “*loves walking and hiking around our coasts, villages and beauty spots.*”

18. Indeed.

19. The natural beauty of our coastline, the fragile cliffs at Thorpeness which are a huge attractant, the ancient medieval villages such as Friston, the wide skies, the extraordinarily rich wildlife, the bird reserve at Minsmere, our sites of Special Scientific Interest and Special Protected Areas , the stunning and protected Suffolk Coast and Heaths Area of Outstanding Natural Beauty ( recently ranked among the best beauty spots in the UK.... this is what brings into our region close to £40 million per annum, as one of the most successful nature based tourism centres in the nation ( according to research commissioned by the Suffolk Coast Destination Management Organisation).

20. Local communities work in this industry, which, along with the very strong presence of the internationally famous Snape Maltings, theatres and art studios, provides a thriving and indigenous economy.

21. On November 4th 2021, ██████████ expressed his frustration at “ campaigners “ slowing down the process of welcoming the next wave of windfarms in the pipeline off the coast, arguing that it is *the lesser of two evils* to proceed at pace. Instead, we should view ourselves, according to ██████████, MP for Waveney, as a *global exemplar, the engine room of the UK for many decades to come.*

22. We are under no illusion; this, if allowed to push through at speed as urged by ██████████, will last for decades, and we know that this region will be changed for ever. The current local economy will not survive, because the particular quality and character of landscape that brings people here will no longer exist. The works proposed are not, as so often stated by SPR, temporary, as they provide a gateway for National Grid to perpetuate the process indefinitely.

23. SPR have of course argued, as the industry generally does, that the development will bring work and economic benefit to local communities.

24. And we have noted this very important fact:

*“ While some benefits of a major infrastructure projects are local, most of spread regionally or even nationally; by contrast the adverse impact of a project almost always concentrated locally.....”*

25. This is from a document by Duncan Field, entitled **Overcoming Obstacles to Planning major infrastructure projects.** ( 11th June, 2020.) ( Journal of Urban Regeneration and Renewal, Vol 14, Henry Stewart Publications). He is paraphrasing the **Institute for Government “ What’s wrong with infrastructure decision making (2017), para 5 page 3,** which puts it very clearly:

*“ Economic infrastructure has diffuse benefits and concentrated costs.”*

26. Here, the concentrated costs are our local and integrated tourist destination economy based on an exceptional and delicate quality of landscape and biodiversity, as well as our quality of life, loss of dark skies, networks of pathways, open sea views, and traffic and transport congestion. And I’d like to emphasise that this is not a small scale isolated awareness and protest at the damage caused by bringing this infrastructure Onshore at such an inappropriate place.

27. Such is the scale of this movement on our region that groups are uniting across the entire region, including parts of Norfolk and Suffolk. We are seeing the wider picture, as developers and perhaps governmental drives are not.

28. At the time of writing, Duncan Field was ( and may still be) a partner at the specialist planning law firm Town Legal LLP, UK, advising on major infrastructure projects around the UK, including Offshore wind farms.

29. As such, Mr Fields’ expertise provides an interesting insight into the relationship between accountability and strategies for success within the Planning process.

**“ Bureaucratic Bindweed... overcoming the obstacles in achieving Consent .”**

30. In the Abstract of his contribution, Mr. Field notes that

*The obstacles which a promoter of a project must overcome are inherent in any consenting system which is rooted in **democratic participation and political accountability.***( my emphasis).

31. ██████ goes on to quote the then Secretary of State for Transport, the Rt Hon Grant Shapps, as he makes reference to “ *bureaucratic bindweed* “ slowing down the development of infrastructure within the UK.

32. ██████ wonders if the Secretary of State “*had the Planning system in mind when he was referring to bureaucratic bindweed?*”

33. From this perspective, the protected nature of an Area of Outstanding Natural Beauty or the result of a judicial review may perhaps be seen as “ bindweed. “

34. [REDACTED] goes on to state:

*I would venture to suggest that the key obstacles that remain in Planning for major infrastructure projects are inherent in any consenting system which is rooted in the principles of democratic participation and political accountability. This paper explores those obstacles and what in practice may be done to overcome them.”*

35. In respect of democratic participation, whether regarded as an obstacle or not, Interested Parties will need to have confidence that **all** relevant data provided, whether by the Applicants, Interested Parties or other Stakeholders, is being built into decision- making, and that the legal framework of the Assessments submitted by The Applicants is adequate and The Applicants have achieved compliance with legal requirements and adherence to best practice in respect of:

Environmental Impact ( Flood Risk)

Cumulative Impact Assessment

Equalities Impact Assessment.

Economic and Tourist Assessment.

Engagement with Stakeholders and Public Consultation.

36. To the extent that the Examination has permitted me to engage within this process, I do not believe that such compliance has been achieved.

37. ( I would also note that the contentious issue of the Applicants use of Non Disclosure Agreements within the Examination has been addressed neuter by the Planning Inspectorate nor the Applicants. )

### **Conclusion.**

38. In terms of political accountability, I urge the Secretary of State to recognise that the adverse impact of these proposed developments would outweigh benefits to a catastrophic degree in his role as decision maker within the current Government.

39. I join with Suffolk Energy Action Solutions, Save Our Sandlings and Substation Action Save East Suffolk and Therese Coffey in calling for a Split decision whereby Consent may be given for the Offshore structure but full consideration is given to to better locations for the infrastructure necessary on a brownfield or industrialised site.

***“ Britain’s iconic landscapes are part of the fabric of our national identity - sustaining our Communities, driving local economies and inspiring people across the ages.***

***That’s why, with the natural works under threat, it’s more important than ever that we act now to enhance our natural environment and protect our precious wildlife and biodiversity.”***

**[REDACTED]**

31 January 2022.