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Mr M Mahony
Substation Action Save East Suffolk
(SASES)

Issued via email

Date: 27 February 2019

Dear Mr Mahony,

Thank you for your letter dated 30 January 2019 regarding ScottishPower Renewables' (SPR) proposals for East Anglia ONE North (EA1N) and TWO (EA2) offshore wind farms and other Nationally Significant Infrastructure Projects (NSIPs) proposed in East Suffolk. I apologise for the delay in our response.

I am the Infrastructure Planning Lead dealing with the EA1N and EA2 proposals, Kay Sully is the Case Manager and Liam Fedden is the Case Officer assigned to these projects. Stakeholders can expect to receive correspondence from either member of our team.

As you will no doubt be aware, both SPR and EDF Energy are currently undertaking statutory pre-application consultation on their proposals, in accordance with the Planning Act 2008. We therefore advise you to respond to these consultations, as developers have a duty to have regard to comments received in response to their statutory consultation.

I have addressed your questions in order, below.

1. Does the Planning Inspectorate regard the current outcome in relation to the Bawdsey to Bramford cable route, as satisfactory?

We have discussed your query with SPR and they have drawn our attention to the Connections and Infrastructure Options Note (CION) produced by National Grid, dated June 2018 which explains the reasons for the choice of cable route, the document can be found on this link on SPRs website:

https://www.scottishpowerrenewables.com/userfiles/file/National_Grid_COIN_Process_Connection_Assessment_Note.pdf

At the pre-application stage, if you have any comments on any aspects of the proposals you should raise these directly with SPR. Once the applications are submitted, and if they are accepted for examination, an Examining Authority (ExA) will be appointed to examine the application. It will be for the ExA to decide if they wish to ask the Developer specific questions on this matter.

2. What advice is PINS giving or planning to give to, EdF, SPR, National Grid Ventures, the consortium proposing to expand the Greater Gabbard windfarm and the consortium proposing to expand the Galloper windfarm in respect of the potential cumulative impact of all these major projects given the proposals to build them over the next 10 years?

The Planning Inspectorate provides section 51 advice in accordance with the Planning Act 2008 and is required to publish this advice. Any advice we give will be published on our website. There is no set deadline for when advice must be published, however we aim to publish advice as soon as practicable. Please also refer to the answer to question 5 below.

3. Does the Planning Inspectorate think it reasonable that residents, their Parish and District Councils and their County Council, as well as a host of other local stakeholders, will have to respond to multiple consultation phases for multiple major projects over the next few years and beyond? The relevant developers appear to have no consideration as to the burden placed on residents and their health and wellbeing.

We understand that responding to consultations is a time-consuming process. We do advise developers to be mindful of consultation fatigue and to be aware of other consultations taking place in the area at a similar time.

You may be aware that Developers are required to produce a Statement of Community Consultation (SoCC) for their proposals, setting out how they intend to consult persons living in the vicinity of the proposed project. Developers are required to send a draft SoCC to the relevant local authorities for their comment, prior to undertaking this consultation. Local Authorities have the benefit of local knowledge and will have an awareness of any other consultations taking place at similar times and can advise developers on such matters.

The Planning Act 2008 ensures that those persons potentially affected by NSIPs have many opportunities to have their say on a proposal, including at the pre-application stage where developers are considering potential options and seeking comments. Whilst we acknowledge that this process takes time and energy, we fully support the opportunities for engagement in the process which the Planning Act 2008 offers.

4. We note that PINS were concerned that the applications for EA1N and EA2 would overlap (see note of meeting on 20 June 2018). What is PINS view on the fact that the applications for some or all of the above projects will overlap?

The comments raised by the Inspectorate in the meeting on 20 June 2018 were mainly regarding the practical implications of conducting examinations in parallel on similar offshore wind proposals with overlapping onshore elements, proposed by the same developer. The Inspectorate will do all it can to draft examination timetables which are considerate of other nearby projects with similar stakeholders, whilst ensuring it also meets the statutory deadline to complete examinations within a six month period.

5. Does PINS regard it as appropriate for DCO applications for all these projects be made (with all the work, consultation and expense that involves) so it will only be at the point of examination that the issue of cumulative effects will be determined?

The assessment of significant cumulative effects for a proposed development is undertaken as part of the Environmental Impact Assessment process. This includes

(amongst other things) the preparation and compilation of the Developer's Environmental Statement (ES), which is undertaken at the pre-application stage. In preparing their ES the Developer is required to collaborate and take account of the views of the consultation bodies. During the pre-application process the Planning Act 2008 requires the Developer to publicise and consult on the preliminary environmental information. Both SPR and EDF Energy are currently undertaking pre-application consultation on the preliminary environmental information related to their proposals.

The examination will also consider all significant effects associated with a proposed development including cumulative effects.

6. Is the Planning Inspectorate aware that the Crown Estate has launched Round 4 in respect of more windfarm projects off the East Anglia Coast which will lead to yet more major development proposals? The latest announcement on this topic was issued by the Crown Estate on 16 November 2018.

Yes the Inspectorate is aware that the Crown Estate has recently shared its updated proposals for Round 4 offshore wind leasing.

7. Does the Planning Inspectorate think it has any role, either formal or informal, in providing any input/advice in relation to the onshore impact of all these proposals either to the Crown Estate or the National Grid?

We do not have a formal role in this respect, other than providing advice in line with section 51 of the Planning Act 2008 where this is sought. We do engage with the Crown Estate and other relevant bodies, and update them on lessons learned through the process, based on information in the public domain.

8. Is the Planning Inspectorate satisfied that National Grid is free to allocate onshore connection locations for offshore power cables without any consultation through the planning process? It is the inappropriate allocation of these connections which is at the root of most of the current objections to/problems with the current projects. At no time have SPR indicated that they are consulting on National Grid's proposals and National Grid have apparently failed to carry out any stakeholder engagement of their own.

Pre-application consultation is undertaken by all NSIP developers on their proposals, prior to submitting their applications. If you have comments to make on any aspect of a proposal, we advise you to make these in writing to the developers during their consultation stages.

National Policy Statements (NPSs) provide the primary basis for NSIP decisions. The NPSs most relevant to offshore wind farm proposals are:

- EN-1 Overarching National Policy Statement for Energy,
- EN-3 Renewable Energy Infrastructure, and
- EN-5 Electricity Networks Infrastructure.

Amongst other matters, these NPSs include considerations related to grid connections for offshore wind proposals.

In regard to National Grid's process, National Grid Electricity Transmission (NGET) is required to make offers to parties seeking connection to the national electricity transmission system (NETS). The Connection and Use of System Code (CUSC) sets out the standard commercial terms between NGET and users of the NETS. Users enter into a connection agreement in the form set out in the CUSC which, amongst other things, sets out any works required to deliver the connection.

On a related matter the quality of consultation conducted by SPR in relation to EA1N and EA2 has been poor and the local community is extremely dissatisfied with the manner and content of SPR's consultation. This is a view shared by the local authorities. By way of example, in SPR's summary of the Phase 3.5 consultation it made no reference to the objections of the local authorities or those of the local MP! We have pointed out to SPR the deficiencies in the latest phase of consultation, Phase 3.5, and a copy of that letter was sent to the PINS email address for this project and is attached for reference. Again, your comments would be appreciated.

We note your comments about SPR's consultation and that you have informed SPR directly of your comments. Your comments will remain on our file. Once the applications are submitted, a decision will be made as to whether they can be accepted for examination. During this period, local authorities are asked for their views on whether they consider the pre-application consultation was adequate. You may therefore wish to also send your comments to the relevant local authorities. Comments from the local authorities are considered when deciding whether or not an application can be accepted for examination.

I hope you find the above information to be helpful.

Yours sincerely

Kathryn Dunne

Kathryn Dunne
Infrastructure Planning Lead

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