

From: Rory Stracey <RStracey@towers.com>

Sent: 21 November 2019 11:27

To: 'robert.jenrick@communities.gov.uk' <robert.jenrick@communities.gov.uk>;

'psrobertjenrick@communities.gov.uk' <psrobertjenrick@communities.gov.uk>

Cc: 'EastAngliaTwo@planninginspectorate.gov.uk'; 'george.freeman.mp@parliament.uk';

'EastAngliaOneNorth@planninginspectorate.gov.uk'; 'therese.coffey.mp@parliament.uk';

'norman.lamb.mp@parliament.uk'; 'beiscorrespondence@beis.gov.uk';

'Secretary.state@beis.gov.uk'; 'mhclgcorrespondence@communities.gov.uk'

<mhclgcorrespondence@communities.gov.uk>; 'psesthermcvey@communities.gov.uk'

<psesthermcvey@communities.gov.uk>

Subject: FW: URGENT - East Anglia One North Offshore Windfarm (EA1) and East Anglia Two North Offshore Windfarm (EA2) – Application for Development Consent Order [TH-THL.FID118736201]

Importance: High

Dear Secretary of State

We have today written to the Secretary of State for Business, Energy and Industrial Strategy following her decision to conduct a review into the strategy for the use of an off-shore ringmain as part of the above projects. However, we now understand from the Planning Inspectorate that the decision on whether to accept the DCO applications is one that is to be taken by the Secretary of State for Housing, Communities and Local Government (we note that SoS for BEIS will still take the ultimate decision on whether to approve the development consent orders following examination in public in due course should matters progress to that stage).

We therefore attach a letter (in similar terms to the one sent to the SoS for BEIS earlier today) for your urgent attention which relates to your pending decision on whether to accept the above mentioned applications for two development consent orders. We also enclose a copy of the letter from George Freeman MP as referred to in our letter.

We would be grateful if you could ensure that the Secretary of State takes our letter into account in reaching his decision, noting that the deadline for your decision is tomorrow (Friday 22 November 2019).

Regards

Rory Stracey
Partner

Towers & Hamblins LLP
The Senate
Southernhay Gardens
Exeter
EX1 1UG
DX 8343 Exeter

d +44 (0)1392 612235

t +44 (0)1392 612600

f +44 (0)1392 612601

www.towers.com

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The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and
Local Government
2 Marsham Street
Westminster
London
SW1P 4DF

your ref
our ref RQS.35237.1
direct dial +44 (0)1392 612235
email rstracey@trowers.com
date 21 November 2019

Dear Secretary of State

East Anglia One North Offshore Windfarm (EA1) and East Anglia Two North Offshore Windfarm (EA2) – Application for Development Consent Order

We act for Suffolk Energy Action Coalition (SEAC), a community group formed to represent the views and interests of local people living in and around Friston, Suffolk.

Our clients have been active participants in the pre-application statutory consultations that have preceded the submission of applications for development consent orders for EA1 and EA2. The Secretary of State will be aware of these applications which have recently been submitted by Scottish Power Renewables (SPR) through its subsidiaries East Anglia ONE North Limited and East Anglia TWO Limited. The two applications combined could result in up to 230 off-shore turbines located off the coasts of Norfolk and Suffolk with associated on-shore infrastructure.

Our clients support the Government's agenda to promote renewable energy sources, but SEAC has deep concerns about the sustainability of the current EA1 and EA2 proposals in light of the proposals to locate the major associated infrastructure on-shore, which would cause major and irreversible environmental and economic harm to the areas within Norfolk and Suffolk that would be affected by the proposals. It is SEAC's position that this harm can be almost entirely avoided through the incorporation of off-shore ring mains (ORM) which would bring off-shore energy onto the national grid whilst minimising the need for the extensive on-shore cabling and intrusive substation infrastructure that would severely impact sensitive countryside settings.

We have had sight of a letter dated 28 October 2019 from the Rt Hon George Freeman MP, writing on behalf of himself and the Rt Hon Therese Coffey MP and the Rt Hon Norman Lamb MP, and we enclose a copy of that letter for ease of reference. All three right honourable members represent constituents that would be directly and adversely affected by the harmful on-shore infrastructure that is currently being proposed by SPR. We note from the letter that the Secretary of State for Business, Energy and Industrial Strategy and other ministers recently met with the right honourable members to discuss the potential on-shore impacts of EA1 and EA2, and the need to formulate a strategy for the connection of off-shore wind farm infrastructure in the Southern North Sea to the National Grid. The letter records that in light of representations from the said right honourable members the Secretary of State for Business, Energy and Industrial Strategy has decided to set up a review to explore the potential for an off-shore ring main instead

LONDON BIRMINGHAM EXETER MANCHESTER ABU DHABI BAHRAIN DUBAI MALAYSIA OMAN

Trowers & Hamlin LLP DX 774 Lon/City
3 Bunhill Row t +44 (0)20 7423 8000
London f +44 (0)20 7423 8001
EC1Y 8YZ

www.trowers.com

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of the current proposals for multiple on-shore cable corridors and substations across Norfolk and Suffolk. We also note that the decision to carry out a review of the strategy will occur after the forthcoming general election if and when the Government reassembles.

We have no doubt that the letter of 28 October 2019 accurately records the decision by the Secretary of State for Business, Energy and Industrial Strategy on this matter. In light of this decision, we have asked the Secretary of State for Business, Energy and Industrial Strategy to confirm for the record that she does indeed intend to conduct such a review. In particular we have asked for confirmation of the timeframe for conducting the review, the procedure to be followed (including details of any consultation exercise that is proposed), and the terms of reference for the review.

Our clients consider the decision to be welcome news given that SPR's approach to EA1 and EA2 has been to entirely discount any notion of an ORM to serve these proposals. However, you will be aware that following submission of the applications for development consent orders in respect of EA1 and EA2 on 25 October 2019, a decision on whether to accept the applications must be made by Friday 22 November 2019 as set out in Section 55 of the Planning Act 2008. You will also be aware that Section 55(3) of the Planning Act 2008 sets out the circumstances in which the Secretary of State *may* accept an application. If the mandatory matters set out in Section 55(3) are not satisfied, the Secretary of State has no power to accept the application. However, Section 55(3) does not prohibit the Secretary of State from taking other material considerations into account in reaching a decision on whether to accept an application. In short where the mandatory requirements for a valid application are met, the Secretary of State for Housing, Communities and Local Government then has discretion when deciding whether to accept an application for a development consent order or not.

We consider the decision by the Secretary of State for Business, Energy and Industrial Strategy to conduct a review into the strategy for bringing off-shore power into the National Grid to be highly material to your decision as Secretary of State for Housing, Communities and Local Government on whether or not to accept the applications that are now before you. Clearly the examination in public that would follow acceptance cannot proceed in a meaningful way until the proposed review has been carried out and any strategy in this area has been adopted by the Secretary of State for Business, Energy and Industrial Strategy. Similarly any review to be carried out by the Secretary of State for Business, Energy and Industrial Strategy would be rendered pointless if the applications for development consent orders are considered without any regard to the forthcoming review. In light of this we kindly request that you exercise discretion and decline to accept the applications pending the outcome of the forthcoming review by the Secretary of State for Business, Energy and Industrial Strategy. Such a decision would enable the Secretary of State for Business, Energy and Industrial Strategy time to carry out the thorough review that is required in this case, and it would avoid the unnecessary wasted expense for all parties that would arise if the development consent order process were allowed to progress at a time when



one of the core strategic issues (the potential for an off-shore ringmain) is being considered by the Government.

It is vital that the Secretary of State for Housing, Communities and Local Government and the Secretary of State for Business, Energy and Industrial Strategy adopt a consistent and joined up approach to this issue.

We look forward to hearing from you.

Yours faithfully

A large black rectangular box redacting the signature and name of the sender.

Enc.1

Cc. The Rt Hon George Freeman MP, the Rt Hon Therese Coffey MP, the Rt Hon Norman Lamb MP, Planning Inspectorate, Secretary of State for Business, Energy and Industrial Strategy



HOUSE OF COMMONS
LONDON SW1A 0AA

The Rt Hon Andrea Leadsom MP
Secretary of State for Business, Energy and Industrial Strategy
1 Victoria St
Westminster
London
SW1H 0ET

Monday 28th October 2019

Dear Andrea,

Offshore Wind Energy off the Norfolk and Suffolk coast: rethinking a more sustainable strategy for onshore connection.

I am writing on behalf of myself, Therese Coffey MP, Suffolk Coastal, and Norman Lamb MP, North Norfolk, to thank you and your Ministers for taking the time to discuss the serious strategic policy challenges raised by the lack of an overall strategy for the connection of offshore wind infrastructure in the Southern North Sea to the National Grid in the East of England.

As discussed, over the last year it has become clear to many of us in Norfolk and Suffolk – MPs, Councils, the LEP, tourism agencies, farmers, wildlife and countryside lovers and various related agencies, and many thousands of residents – that we face a wave of potentially serious environmentally and economically disruptive onshore grid connectivity infrastructure from the otherwise welcome offshore wind farms coming to the Southern North Sea, which could be avoided through the use of an offshore ring main (ORM).

I am delighted that you have decided, in light of our representations, and the environmental commitments in the Government's flagship Environment Bill just announced in the recent Queen's Speech, to set up a proper Review of the potential for an Offshore Ring Main instead of the current proposal for multiple onshore cable corridors and substations across the Norfolk and Suffolk coasts.

This is wonderful news which will be greeted with genuine joy by all the many thousands of people who have looked on in increasing horror at the proposal for hundreds of kilometres of high voltage cabling in trenches across the Norfolk and Suffolk coasts to multiple onshore substations the size of Wembley Stadium.

Background.

As explained, in the last few years I have supported both the offshore wind generation revolution and, in my own constituency, subject to appropriate siting, screening and local

community benefit, two major sub-stations. I am 100% committed to, and supportive of, offshore wind generation as both a strategic renewable energy priority and an opportunity for the Eastern Region.

As you know, the East coast (and particularly the coast of Norfolk and Suffolk) is rapidly becoming the UK's offshore energy powerhouse, with a further three of the world's largest offshore wind farms in the pipeline off the Norfolk coast, and another three more expected off the coast of Suffolk.

In fact, the Southern North Sea is set to become the world's most concentrated cluster of offshore wind power in the world, with TEN major wind farms anticipated.

Whilst this is excellent news for the UK's energy economy, decarbonisation, reduced reliance on foreign oil and gas, and for those parts of East Anglia which benefit from involvement in the construction work, it also has serious environmental impacts on the marine, coastal and onshore habitats through which the connected infrastructure will be built, which needs to be seriously considered in choosing the right connection strategy.

Connection to the Grid.

The issue is how best to connect this strategic offshore energy to the national grid?

If just the current two proposed wind farms off the coast of Norfolk alone are given the greenlight, at least 115 kilometres of countryside will be dug up to make way for the necessary cable corridors, and two new electrical substations will be built – each the size of Wembley Stadium. Over the 11-year time period that it is estimated will be required to construct the necessary infrastructure for these three wind farms, a 3,300% increase in the number of HGV journeys will also occur, with much of this traffic being on some of the worst-affected roads in the county.

With wind farms off the Suffolk coasts now also in the pipeline, we are about to repeat this damage to some of the most environmentally precious wetland and coastal landscapes in Norfolk and Suffolk (where coastal tourism is a major part of our economies), as well as massively impact many communities along the routes of the proposed cabling.

Overall Environmental impact assessment

Whilst the environmental case for renewable energy per se is of course overwhelming, I was delighted to hear you make a point of emphasising that it does not mean that any and all renewable schemes should be “waved through” without proper regard to their overall environment impact.

I'm afraid this is how the proposed onshore connectivity of offshore wind power appears to be being handled in East Anglia. Because the developers know that it is deemed “strategic” national infrastructure in which the normal planning rules don't apply, I and others fear that a



lot of plans and proposals are being made which are NOT properly assessing the overall environmental impact.

While the Government is making fantastic and rightly welcomed strides in its moves to protect our environment (most recently in the Environment Bill 2019-20 and the legally binding commitment to the net zero target for the country's contribution to global warming by 2050), we believe that, in the eagerness to support the development of the offshore wind sector there is a real risk of inadvertently causing more damage to the vital habitats, ecosystems and fragile environments of these internationally recognised wetland coastlines.

The more that people investigate the actual process by which we have ended up in this current situation, the clearer it is that there has been no proper strategic consideration of the strategic options for bringing this scale of offshore wind infrastructure onshore. (Indeed, at no point in the past seven years has National Grid ever held a proper strategic discussion in Norfolk or Suffolk setting out the options and choices, at which the elected representatives, either at council or parliamentary level, or the general public could contribute).

It is for these reasons that I and the signatories to this letter support the exploration of an alternative way in which this offshore energy can be brought onshore.

We are delighted by the news that if/when the Government returns to office you will launch a Review into the environmental impact of the proposed connectivity plan, including specifically the replacement of the current cable & substation plan with an offshore ring main.

The Offshore Ring Main

The viability of an Offshore Ring Main (ORM) is one such alternative that a number of us believe would take away the need for multiple substations and cable corridors – protecting our countryside and avoiding the huge disruption that accompanies such construction.

This could require just two large onshore substations (with ideal locations, like Bacton in Norfolk, already being put forward) and seriously reduce the length of cabling not only onshore, but offshore also. This really does seem to be a “win-win” option.

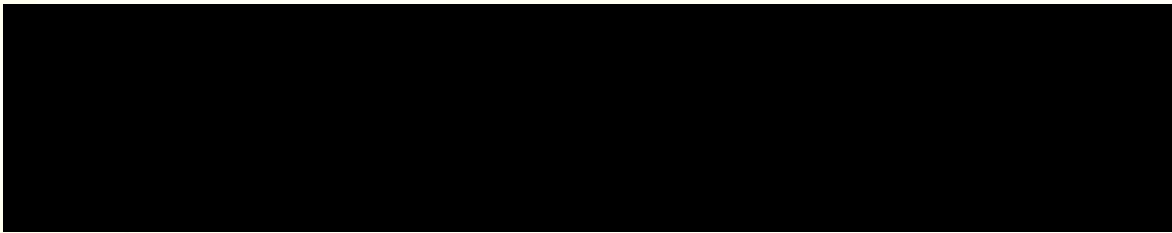
We are aware that, in a 2015 report, National Grid and offshore energy companies considered the viability of an integrated offshore design – stating that “the project team does not believe it would be economic and efficient.” It would be interesting to see the reasoning, evidence, and numbers behind this position given the rapidly growing importance of the sector in our country. And whether that analysis stands up now to the Government's laudable commitments framed in the Environment Bill.

The Review

These are obviously all issues to be considered in the Review that you have committed to if and when the Government reassembles after the Election, and we look toward to working with you on it.

Thank you again sincerely for having taken so much time and trouble to listen to the arguments that we have set out, and to commit to a proper Review of the Options for bringing the offshore electricity onshore.

Your decision to look again at this on strategic environmental grounds is hugely welcome and will give huge hope to many who have felt that nobody in power was able to really listen and act. You have. Thank you.



George Freeman MP

Member of Parliament for Mid Norfolk

Rt. Hon Dr Therese Coffey MP

Member of Parliament for Suffolk Coastal

CC.

Rt. Hon Sir Norman Lamb MP

Chairman of LEP

ORM Campaign

Rt Hon Theresa Villiers

Rt Hon Kwasi Kwarteng MP

Nadhim Zahawi MP