

From: [REDACTED]
To: [East Anglia ONE North](#); [East Anglia Two](#)
Subject: Written submission to Virtual Hearing for EAIN and EA2, deadline 29 September.
Date: 29 September 2020 15:01:20
Attachments: [PINS EAIN Ea2 Written submissions Tessa W.pdf](#)

My Ref: EAIN. IP: 20024031 / AFP 132
EA2. IP: 20024032 / AFP 0134.

Dear team,

Please find attached in PDF form my written submissions and request to speak in relation to the virtual Procedural hearing of 16 September in connection with SPR's East Anglia One North and East Anglia 2 projected wind farms.

Please do let me know if there are any queries or problems with downloading, in which case I will re-send as an email or a Word document.

With thanks,

Kind Regards,

Tessa Wojtczak.
[REDACTED]

Sent from my iPad

All these comments apply to both EA1N and EA2.

Agenda Items 2/3

Virtual meetings.

1. Despite the current circumstances dictated by COVID 19, the decision to push through with these proceedings virtually in order to observe original timelines should be reconsidered, as it will be detrimental to those unable to access or manage virtual engagement. Many affected are struggling with circumstances additionally complicated by the pandemic, making it difficult for them to follow procedures now developing rapidly.
Rynd Smith mentioned that if changes or delays are to be made to the timetabling, one consequence would be that the Applicant would be obliged to give notice for 21 days. I understood the implication to be that that would disadvantage the Applicant. On 11th March 2020 the Inspectorate had to request the Applicant to comply with the procedural requirement to advertise a meeting to be held at Snape later that month, which they had failed to do. If it became necessary for reasons of frontloading transparency or making sure that both Applicant and Respondents have a fair hearing, that such notice may need to be given, it shouldn't be regarded as a disqualifying factor, and I feel that timetabling should not be adhered to in order to avoid that contingency. Rynd Smith did say that it wouldn't be fair to run the risk of cancelling meetings, but the fairness must work both ways.

Technical Exclusion.

The Inspectorate recognised the challenges posed by virtual engagement, but many affected are confused by the process, or do not have access to, or the ability to manage, internet engagement; living in an area of internet instability compounds the problem. The Lead congratulated two of the IPs taking part in the process on their internet connection; both have leading roles in this process and those two successful connections do not represent the weight of people who may self-exclude. Many affected in this area are elderly and will not be as confident as they would be speaking at a physical location with the presence and support of others like-minded. Those people are more isolated now due to COVID, and won't have a family member or friend to assist them in the process. Even speakers for the Applicant appeared to struggle on occasions with the technology, occasionally creating a break in the flow of proceedings, at a time when one hoped that they would be able to focus on the points made. I agree with Marianne Fellowes representing Aldeburgh Council, that no one should be disadvantaged by the nature of these proceedings. Rynd Smith did recognise that it was only possible to have limited numbers represented at virtual hearings, and that there was less flexibility as unarranged submissions could not be heard, as they would be at a physical meeting.

The Applicant responded by saying that they had consulted, or may be consulting, Snape Maltings as to the possibility setting up a facility there, though they didn't know how compatible that might be with PINS technology, in which case Snape would be conducting a risk assessment. Risk assessments in entertainment venues are highly intensive and take a great deal of time to complete, even for their own projects, let alone when required to investigate something of this scale and complexity in the virtual arena. Snape Maltings have been working hard to open up their own programme and have more limited resources than usual. Their focus at this time will be their artistic presence. Additionally, with Social Distancing taken into account, this is not a large enough venue. It's unlikely that they are in a position to facilitate this request. The Applicant's attempt at mitigation here appears inadequate, effectively passing on logistical problems to another enterprise without exploring more imaginative or suitable options, ie sports halls or other venues. Could they be requested to do so?

Awaiting the BEIS review.

Why proceed with the original timetable in virtual meetings when the BEIS Offshore Transmission Review is under way? It is clear that these projects, EA1N and EA2, are not simply harbingers of forthcoming projects in this area but intimately connected with plans for Nautilus and Eurolink (National Grid Ventures projecting

those along the same AONB Landfall and cable corridor) and SCD1 and SCD 2. [REDACTED]

[REDACTED] That is why we believe that the process should be halted until BEIS can address this significant concatenation of developments; indeed, this Hearing should be subject to the results of that review. The Offshore Transmission Network Review acknowledges “considerable environmental and local impacts, particularly from associated onshore infrastructure required to connect to the National transmission network”. I urge the Inspectorate to recognise that these are the issues that this forthcoming review is designed to address, and not to jump the gun by proceeding with an undue emphasis on sticking to timetabling.

There is strong feeling locally that this emphasis on haste strongly favours the Applicant and disadvantages other parties. At points in the proceedings the speaker for SPR referred to the “legitimate expectations of SPR” and how delay to consent would “jeopardise” them. Surely the Hearings are designed to address all positions fairly? I support one of the participants in asking what is the driver to these hearings being forced through? Will the Inspectors consider at least a pause until the BEIS report is made available? Although unwarranted delay is not justifiable, I’d like to emphasise one concern I have.

At a later stage, referring to timetabling and possible changes made in mitigation by SPR, I understood the Lead Inspector Rynd Smith to remark that the representations made by local people and Interested Parties implied that we desire a fully concluded decision “as soon as that can reasonably be achieved”. In response to the Aldeburgh Councillor, Mr Smith said that early Open Floor Hearings would enable IPs and respondents to “get things off their chests as soon as possible”. If that is the perception, I stress, with respect, that it is not the case at all. We want to see a rigorous, fully considered decision, fully concluded or not, that reflects every aspect of this challenging and complicated situation. There is absolutely NOT an urgent need for a decision sooner rather than later, but one that we can support, confident that not only the Inspectorate, but also the Applicant, has fully and rigorously listened and fairly responded. There is a sense of apprehension, if not alarm, that the procedure may be pushed through in advance of this BEIS Review, with the perception, once again, that it favours the Applicant and does not allow us to gather our resources, or the Inspectors to investigate fully, at a time of great pressure. Many respondents are engaging at a detailed and professional level with the technically and procedurally detailed responses from SPR, and are not simply awaiting an opportunity to unburden themselves.

Agenda Item 4.

Concurrent Hearings EA1N and EA2. These remarks apply to both EA1N and EA2.

The Lead Examiner Rynd Smith remarked early on in the proceedings that the hearings for both projects would be held concurrently, unless the Inspectorate were “given good reason” to consider them as separate projects. I do not believe that the Examining Body should be obliged to push through a virtual hearing of two such significant projects, especially concurrently, shortly before the BEIS review. That circumstance alone, of 2 DCOs being conducted together, is unprecedented, and will increase complexity. The National Planning Inspectorate must not allow these two separate and highly significant Applications to be conjoined. Not only is this unprecedented; I understand that the P.I. itself has concerns as to how efficiently these applications can be managed in tandem. Admission was made at the Hearing that the Inspectorate was, like us, challenged by virtual hearings. What is the justification for managing two applications under these circumstances? It is likely that the two Projects will not run concurrently but consecutively, the second encountering entirely different circumstances through the doubly extended period of construction and industrialisation of the area. Additionally, these projects bear a great weight of significance in relation to major future projects that will in all probability capitalise on the infrastructure that SPR create (NGV projects Nautilus and Eurolink at the proposed Landfall and hub.) The decision to conduct these DCO processes together highlights the National failure in strategic planning and overview of the numerous major projects proposed for this area. The consequences for this small area merit more considered and contextualised evaluation. The pressure created for local interested parties, especially at a time of personal and national upheaval, favours the Applicant.

AGENDA Item 5. Both .EA1N/ EA2.

National Grid. Please consider the role and accountability of National Grid, so significant in this process, from Land selection to future projects at the same proposed Landfall and substation locations. The National Grid has a duty to present its own DCO Application. It is probable that the National Grid will use the proposed substation at Friston for Nautilus and Eurolink. Why has its application been integrated in SPRs EA1N and EA2 proposals? It has been exceptionally difficult for local working parties to get any response from National Grid up to this point. Please aid the transparency and fairness of this procedure by requiring National Grid to present its own DCO application.

Annex C. Items 2/11/15/17

Cumulative Effect. Please consider following points in relation to both EA1N and EA2.

The East Suffolk Council's and County Council's Responses to Key Relevant Representations states their concern that the (major) future (energy) projects proposed for this area should be included in the cumulative impact assessment. Nautilus, Eurolink, SCD1, SCD2, Greater Gabbard, Galloper, Sizewell C, SPR EAIN and EA2 are all either on the table or proposed in the period 2021-35. 9, possibly 10 projects in a small region. The highly significant cumulative effect of all these projects must responsibly and fairly be taken into consideration in this, the first relevant (joint) DCO. Naomi Goold for East Suffolk Council raised the point of pressure on resources caused by the interface of these hearings with the Sizewell C DCO. The council is already subject to considerable pressure due to COVID. The response appeared to be that there should be no conflict as one process should fall into the gap when the other is not active. However, local groups and residents who wish to be fully engaged, as well as the Council, will have to be active and responsive to deadlines for both projects throughout.

I support remarks made by R Turney, that these accumulated projects fall under the scope of the Offshore Transmission Review, and that the Inspectorate need to examine the broader points of co-ordination in recommendations to the Secretary of State. The procedural rationale would be a very different if 6 or 7 projects were being considered, two of which , Nautilus and Eurolink, would be making use of the very technology put in place by these initial two projects EAIN and EA2, and with which they are intimately linked. The outcome could bear strongly on site selection at Thorpeness and Friston .

Agenda item 6. Remarks apply to EA1N and EA2.

Minister Kwasi Kwarteng, for BEIS, recently announced a major review to address “ early opportunities for co-ordination of (energy) projects in the short to medium term, plus a longer term strategy review (for) a more co-ordinated approach for the future... (seeking) appropriate balance between environmental, social and economic costs” . This review recognises the inefficiency of a piecemeal approach in relation to SPR EA1/ EA2 as proposed and is highly relevant, right now, to the matters under consideration. The Preliminary Meetings and Examinations cannot ignore the governmental concerns expressed, and must be suspended until this review is completed to guarantee impartiality and fairness for all concerned.

AGENDA item 7.

In relation to both projects, EA1 and EA2, it is essential that the deadline for written Representations, local impact reports and other submissions should be delayed until after the results of this review.

Agenda Item 8.

In relation to both EA1N and EA2, re item 8, it is essential that there should be specific hearings on key onshore matters to allow fair local informed participation on urgent matters and anomalies: Flooding, Traffic and Transport, Heritage, Landscape, Footpaths, Noise, Socio-economic effects, Tourism, Light Pollution, Ecology, Wildlife Sites. Also:

Site Selection

Alternatives

Interrelationship of projects

Cumulative impacts.

Annex C.

In respect of site visits, I would like to request a site visit to the lanes adjoining the Landfall site near Thorpeness and Ness House, an interconnecting set of pathways and bridleways that are invaluable in connecting local residents with each other, Thorpeness, Aldringham, Friston, Leiston and Sizewell. In the Book of Reference, it is clear that several of these access routes are to be suspended or extinguished. This will cause great hardship locally and I would be grateful if a visit could be made to that at the same time as the Landfall Area so that Inspectors get a sense of the interruption to access that would occur in the construction of the Landfall site, Cable Corridor, and adjacent Construction compounds. I would be happy to provide more references if necessary.

Compulsory Purchase and Unnotified Categories of New Rights sought by SPR and National Grid

National Grid and Scottish Power Renewables have extended their Area of Interest, an indicative onshore Development area, directly adjacent to my residence, and a Centre for Disabled Children, and are additionally seeking temporary possession, potential claims under the Compulsory Purchase Act, and the proposed extinguishment, suspension of or interference with Private Rights which would severely compromise access to my home, and the Centre for Disabled Children on the land where I am a tenant. These new rights were not communicated to me, or, I understand, to my landlord, but were found in the documents lodged at the Council. The New Rights sought could potentially bring Construction Compounds associated with Landfall development directly to the gate of my residence, entirely block one access route, and compromise the remaining other. Details can be found in the Book of Reference 4.3, map Extended Phase 1 Habitat Survey finds dated 12/09/19. Land sites affected are TN25a, TN24a, TN28a, TN29a, TN22a, TR26a, TR30a. Photographs of these sites are made available in the Book of Reference, taken from the private land under consideration. To my knowledge, permission to enter that land for that purpose was not sought from the landowner.

These new potential claims and extended area of Interest emerged after the Public Consultation and were at no time communicated to me or the other households affected, or to our landlord. They were found in the Book of Reference 4.3 concerning Categories of New Rights Sought lodged in the Council. As a result it has not been possible to address these highly significant developments in the rounds of Consultation to this point. I would like to request a Compulsory Acquisition Hearing to address this case, and that sufficient time should be allotted for its consideration and the fact that information concerning the extension of the Area of Interest was not made available to those directly affected. This would greatly aid transparency.

I would be happy to provide further documentation on this matter if required. I would also like to request to speak on this matter, and that of the lanes, at a CAH Hearing or other appropriate occasion.

Anything else.

I would like to address the Applicant's engagement in this Hearing, and, indeed, in this process in general. I was impressed on the emphasis given by the Inspectors on the requirement during this process to listen, then respond and decide on the basis of what they had heard, and I felt that points were being heard attentively by Rynd Smith and the Inspectors. However I also understood that this was the Applicant, SPR's, opportunity to listen and respond too.

I found it very difficult, in the Applicant's responses, to absorb what appeared to be a pre-written response on each occasion delivered very rapidly. On several occasions, many figures and reference points, headings and subsections were quoted in the response which were not at all clear, and which a digital transcription may very well not have been able to render accurately. For those who wish to engage in detail with the technicalities of SPR's points, that makes it difficult to respond. If those were in fact documents, could they not be made available to enable transparency of the details? The effect created was not of engagement on the part of the Applicant, or listening in a developing process, but of making data-heavy pre-prepared statements rather than responding directly to what may have been amplifications of their original points by the IPs.

In the original Public Consultation rounds held by the Applicant, a very similar effect was achieved, in which essentially the original documents that had been posted to us were projected onto a small screen in a large hall, and read aloud rapidly into an occasionally distorting microphone. This was frustrating for a large proportion of the attendees, who could not hear or see what was on offer due to lack of professionalism, leaving them unable to engage and discouraged from attending. I make this point to ask whether, if the documents from which the

Applicants representatives were reading, can't be made available, might they perhaps be encouraged to deliver their statements less rapidly?

I urge that the Planning Inspectorate use this opportunity to redress some of the omissions and uncertainties of procedure that we have encountered in the process of engaging with SPR and some of its representatives, and with National Grid, while seeking clarification of the details of their plans over that period. Our concern is that necessary energy infrastructures should fulfil their functions responsibly, and that the national co ordinated strategy is effective. Now that the Government has taken a stance on that view with the forthcoming review, it does not seem reasonable to hasten through a joint Application. This interrelated series of projects would cause unprecedented industrialisation of an AONB at a time when Boris Johnson has announced plans to protect 30% of UK countryside before 2030.