



SAVE OUR SANDLINGS

Offshore Wind Farms
EAST ANGLIA ONE NORTH PINS Ref: EN010077
&
EAST ANGLIA TWO PINS Ref: EN010078

Deadline 6 Response
from
Save Our Sandlings

Issue specific Hearing 9
Draft Development Consent Order

Response to Agenda Item 1 Welcome, introductions and arrangements for these Issue Specific Hearings 9

In opening statements the Lead Examiner referred to the recent judicial review decision quashing the Vattenfall Norfolk Vanguard¹ project.

Acknowledging the review decision was published 2 days before this hearing, Save Our Sandlings believe this judgement will have serious implications for other energy projects in relation to cumulative effects and impacts.

To put the Judgement into context, since the Planning Act 2008 became law, and with the support of the National Policy Statements (NPSs), there has only ever been one successful challenge to a DCO for the reversal of a refused consent, challenged by the developer. A DCO has **never** before been overturned and consent quashed.

The Planning Act 2008 regime is remarkably resilient, and the impact of last week's judgement will likely have a wide-ranging impact, especially given the various applications for offshore wind developments. Developers will no longer be able to hide behind the National Significant Infrastructure Projects (NSIPs) permissive legislation without **fully** considering the cumulative impacts on the environment, and, **alternatives** for their projects, a requirement by law.

The applicant has repeatedly been unwilling to acknowledge that introduction of a massive substation at Friston for EA1N and EA2 offshore windfarms will inevitably lead to a significant number of follow-on energy projects, culminating in further disruption and excessive cumulative impacts, over extremely long construction periods, potentially well into the third decade of this century.

We await the deliberations of the SoS BEIS on he will proceed post the quashing of the Norfolk Vanguard DCO.

The environmentally damaging onshore radial transmission systems and substations is no longer fit-for-purpose and must become obsolete. The numerous and successive wind farms off the coast of East Anglia need to connect to the National Electricity Transmission System (NETS) by way of the integrated *offshore* system now known as the Offshore Transmission System (OTN) (colloquially the Offshore Ring Main (ORM)). The move towards an integrated solution with shared infrastructure is gathering pace through the Government project - the Offshore Coordination Project (OCP) - this is a project not a concept!

We strongly believe the DCO applications before this Examining Panel should be considered in 2 parts; onshore and offshore. Whilst many stakeholder share reservations about visual impacts and cumulative effects of offshore arrays, we consider this element of the project can be deemed fit to proceed; the onshore elements should not be put forward for approval by the SoS BEIS until such time as a proper integrated solution has been decided incorporating some form of co-ordinated Offshore Transmission System utilising Multi-Purpose Interconnectors or similar.

Response to Agenda Item 1A Preliminary and Procedural Matters

We welcome the Examining Panel's decision to hold an additional agenda item to discuss the complaint raised by Suffolk Energy Action Solutions (AS-074) re: clause in Compulsory Acquisition documents stating payment is conditional upon landowners concerned not opposing development and retracting previously submitted objections to the applicant's EA1N and EA2 projects. Additional submission were received on this subject (AS-075 - AS-084) refers.

At Issue Specific Hearing 7 when the subject was first raised the applicant claimed these clauses were in draft format and supplied as 'indicative samples' and not the final version

¹ [High Court Judgment R Pearce vs SoS BEIS vs NVL](#)

Following further submissions on this subject by interested parties to this agenda item, including concerns from Aldeburgh Town Council representative that letters are being received 'out of the blue' by residents in the town, many of whom have not engaged with the examining process as they had not considered themselves to be directly affected by these projects. It is very concerning that at this late stage in the examining process, affected individuals are still being identified.

The applicant responded that previous submissions about 'gagging' clauses were vexatious and incorrect. No further information was offered as to the validity or otherwise of the clauses.

Any compulsory acquisition agreements should be conducted in a fair, open and unconditional manner. Receiving compensation should not mean the recipients agree or are in favour of the project consequences for loss of land; the right to object should not be conditional to the withholding of compensation, whether in actuality or inferred.

Agenda Item 6 Agreements and Obligations

The County and District councils confirmed discussions are ongoing with regard to commercial agreements. Aldeburgh Town Council asked why local Town and Parish councils had not been privy to these discussions, especially as they would have significant and relevant thoughts as to schemes where funding support would benefit the affected communities.

The applicant is claiming that hundreds of jobs are to be created and local economies will not suffer any lasting effects through the construction of these projects. It is a concern that any commercial agreements between the applicant and County and District councils will help fund other major county-wide projects and not directly provide benefit to the local communities affected by these projects.