

**From:** [REDACTED]  
**To:** [East Anglia Two](#); [East Anglia ONE North](#)  
**Cc:** [REDACTED]  
**Subject:** RE: PINS Ref: EA1N- EN010077 and EA2 - EN010078; My Ref ID No EA1N -AFP-042 and EA2 - AFP-042; Deadline 6 Submission  
**Date:** 24 February 2021 13:26:40

---

Dear Mr Smith

[EA1N AFP-042 and EA2 AFP-042](#)

Herewith some further comments with respect to EN010077 and 0078 Applications explaining our ongoing objections to the applicant proposals in their current form.

1. Water supply
  - 1.1. We are aware that the applicant will be offering a response to the ongoing concerns of all parties whose water supply comes from the well-head sited at [REDACTED].
  - 1.2. We shall continue to object to the proposals in their current form, until we hear solutions that adequately address our rights to a safe water supply for the children and vulnerable adults resident at that site.
2. Trees
  - 2.1. Following the great storm of 1987 when there was severe damage to local woods Major & Mrs Gimson planted three areas of trees. Two of these have been identified by the Applicants and the boundary of their proposed activities excludes them, but there remains one triangle in the south east of the property which could be totally destroyed.
  - 2.2. Trees are a crucial and fragile resource in this area and we strongly object to their potential destruction under the current plans.
3. The need for a Cumulative Impact Assessment (CIA)
  - 3.1. We emphasise the need for a CIA on the following grounds
    - 3.1.1. There is evidence that other cable corridors are being considered. These need to be included in a Cumulative Impact Assessment
    - 3.1.2. Mrs Gimson has received a letter from National Grid Ventures requesting access to her property for geotechnical surveys (enclosed) with respect to a proposed new cable connector between Great Britain and Belgium.
    - 3.1.3. National Grid Ventures have published draft proposals for this Nautilus Interconnector, a 1.4 GW HVDC connection between GB and Belgium. They clearly state that their proposed Interconnector would be operational within the timeframe of the Current applicants work plan (<https://www.nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector> *"Should the project be progressed, a rigorous Environmental Impact Assessment (EIA) and pre-application consultation process will take place and a final application for a Development Consent Order (DCO) could be submitted in 2023. Should consent be granted, a Final Investment Decision is planned for 2024/25. Following this, construction would commence, and the project could be operational by 2028."*
    - 3.1.4. The Interconnector project also states (<https://www.nationalgrid.com/document/125601/download> ) that it would wish to utilise the Friston substation. *" In order to connect Nautilus to the national grid, discussions have been ongoing with National Grid Electricity Transmission (NGET) and the System Operator. From this, NGET have provided a Connection Agreement to use a new 400 kilovolts (kV) substation provisionally referred to as "Leiston 400kV substation". This is the same substation that Scottish Power Renewables (SPR) offshore windfarms East Anglia 1N and 2 are proposed to be linked to. NGET, SPR and NGET are currently working on the premise that all projects will be connecting to the same substation – "Leiston 400kV substation". Nautilus is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision is planned for 2024. Following this, construction will commence, and the project could be operational by 2028"*.

- 3.1.5. The draft plans propose 4 possible entry sites for this cable, two of which (Route C and Route D) are immediately to the north and south of this property and seem to include Ness land (Appendix).
- 3.1.6. The recent High Court ruling in judicial review of the Norfolk Vanguard Wind Farm project in which the Development Consent Order (DCO) was over-ruled is very significant in this regard and can be accessed at <https://www.bailii.org/ew/cases/EWHC/Admin/2021/326.html>. The conclusion (para 164,165) and the subsequent commentary is clear on a number of points
- 3.1.6.1. Cumulative impacts must be addressed. Para 176 states that it is not an appropriate defence for refusing to consider cumulative impacts if the information is about subsequent projects is "limited".
- 3.1.6.2. The suggestion that any cumulative impact is only addressed at a second hearing for subsequent projects was also addressed and rejected in para 135, 136. " 136. *These considerations underscore the absence of any rational justification in the Vanguard decision letter for refusing to make any evaluation of the cumulative impact issue at that stage. The single, perfunctory reason given for deferral, the limited amount of information available on Boreas, could not, in the circumstances of this case, justify by itself leaving the issue entirely to the second examination, particularly where the information was in front of the Defendant, NVL considered it to be adequate and no one suggested the contrary.*
- 3.1.7. We support the response from the Planning Inspectorate examining this East Anglian One North (EA1N) and East Anglian Two (EA2) projects asking for: *"Applicants and Interested Parties who wish to make initial observations regarding the recent decision to quash the SoS's decision on the proposed development are invited to do so to assist the ExA's consideration of the judgement."* We believe that this ruling gives a window of opportunity for all parties to consider alternatives to environmentally damaging onshore radial transmission systems and substations. These alternative will include the numerous and successive wind farms off the coast of East Anglia connecting 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 full blown Government's project - the Offshore Coordination Project (OCP) - <https://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project>
4. In the light of these issues we recommend to the Examining Authority .
- 4.1. **The offshore turbines are recommended for consent.** We are fully supportive of renewable energy and have no objections to the offshore elements of these DCO applications with the proviso all installations are acceptable to stakeholder concerns over the statutory purposes of the AONB affected by these proposals.
- 4.2. **The onshore infrastructure is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield site.**
- 4.3. As an Affected Person, I have participated throughout the course of the Hearings and I think one thing has become clear, the adverse impacts of this particular onshore site location substantially outweigh the benefits of the application when taken as a whole. The impact on our environment and the local communities and economy would be devastating but importantly needlessly devastating. There are alternative sites available which could avoid this destruction by their virtue of being at a brownfield site.
- 4.4. These Applications have come at an unprecedented time of consensus around the importance of offshore wind in reducing the UK's carbon emissions and meeting the government's 2030 offshore wind targets. They have also come at an unprecedented time of consensus around the acutely detrimental impacts of radial connections which these Applications propose. There are still 9 years to go until the Government's 2030 offshore wind targets. There is time for Scottish Power Renewables, National Grid and the Department for Business Energy and Industrial Strategy (BEIS) to get this planning Application right **without** jeopardising these important targets.
- 4.5. A 'split decision' would mean that no time is wasted with respect to the construction of the offshore turbines but would give the opportunity to rethink the onshore aspects of

this project to fall in line with current government aspirations. I am also aware that our local MP Rt Hon Dr Thérèse Coffey also supports a split decision with a pause to onshore plans whilst a more coordinated logical response to the numerous future planned windfarm projects can be developed.

***"We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs."***

***"To minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid."***

**[The Energy White Paper](#)**

Dr Alexander Gimson

On behalf of Mrs EP Gimson, 

24/02/2021