



The Planning Act 2008

East Anglia ONE North (EA1N)

East Anglia TWO (EA2)

Offshore Wind Farms

[Planning Inspectorate References: EN010077 and EN010078]

Deadline 11 Submission re ExQs3 - 3.14.5 (Future Uncertainty)

Submitted for Deadline 11 (07 June 2021) by

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IP 20024016 & 20024017

I believe Justice Sir David Holgate's historic judgement <https://www.bailii.org/ew/cases/EWHC/Admin/2021/326.html> should have a wide-ranging impact for North Sea offshore projects, especially given the various applications for offshore wind and Interconnector developments. No longer should developers be able to hide behind the permissive legislation for National Significant Infrastructure Projects (NSIPs) without fully considering the cumulative impacts on the environment, and alternatives for their projects, as they are and were always required to do by law.

I consider that the strength of the objections and their supporting evidence received during the EA1N and EA2 Hearings have been overwhelming in comparison with any planning benefit and in the light of other less unfavourable options should lead ExA to a recommendation that the Secretary of State (SoS) should refuse consent for at least the proposed onshore infrastructure of both projects. However, it is of course prudent that ExA should anticipate the possibility that the SoS may be minded to consent despite such a recommendation.

In the event that either one or both of EA1N and EA2 projects is approved, there is already sufficient evidence that subsequent DCO application(s) from National Grid Ventures would shortly be forthcoming and quite probably others for major NSIP projects such as SCD1 and other future wind farms, all seeking to exploiting a connection to a nascent major energy hub at Friston.

The Applicants have failed to consider or evaluate cumulative impact of EA1N / EA2 together with those several other projects already slated to connect in East Suffolk under the pretext that they are deemed by the Applicants to be insufficiently defined.

The extent of the unexplored cumulative impact with EA1N and EA2 is a much larger issue than with Norfolk Vanguard given:-

- National Grid's clear intentions that there should be a major connections hub at Friston and to use this opportunity to build one without having consulted with either the local authorities or the general public and without submitting a comprehensive planning application for such a hub,
- that so many other potential projects connecting to the Grid in the 'Leiston area' have already been identified.

Hence any decision to consent would presumably be subject to challenge.

I suggest ExA might recommend to the SoS that should he nevertheless be minded to approve one or both of EA1N /EA2:

1. that such consent must be subject to a comprehensive cumulative assessment of onshore impact with those National Grid Ventures projects that are seeking a connection in the Leiston area and whose findings are found to be acceptable to the SoS.

Further:

2. that EA1N, EA2 and all other onshore radial transmission systems that have already been offered a connection to the National Electricity Transmission System (NETS) in East Suffolk that have not yet been approved and future less defined projects correctly identified by Interested Parties during these Hearings as seeking one must not be consented until there exists a Government approved 'Masterplan' for The East Anglian Coast for the connection of Offshore Wind Farms and InterConnectors to NETS by way of an integrated system and infrastructure that minimises and avoids the proliferation of and duplication of cable corridor routes from landfall to NETS.
3. that the legislation and guidelines applicable to Developers seeking consent for NSIPs are revised in order to ensure Developers cannot avoid providing a proper 'Cumulative Assessment' with respect to all known current and future projects that have been assigned an onshore NETS connection in a particular area or whose offshore sea bed allocation or outline planning indicates that connection in that area may be an option.
4. that National Grid be required to consult on and submit as a separate NSIP planning application a proposal for a National Grid Substation and ancillary infrastructure that is required for offshore

connection where the outline design is capable of supporting multiple Wind Farms and/or Interconnector projects.

END