



South Cottage, Chase's Lane, Friston, Saxmundham, IP17 1PJ

30 January 2019

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Infrastructure Planning Lead - Energy  
The Planning Inspectorate  
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Dear Mr White

#### **EAST SUFFOLK UNDER THREAT FROM MULTIPLE ENERGY PROJECTS**

I refer to Liam Fedden's email of 24 January 2019 (copy attached) in response to (i) my letter dated 3 January 2019 addressed to the BEIS and DEFRA select committees (which was copied to the Planning Inspectorate) and (ii) an email dated 19 January 2019 to the Planning Inspectorate seeking a response.

SASES is a working group set up by Friston Parish Council and has the support of neighbouring Parish Councils.

Mr Fedden's reply indicates that we should be addressing these matters as part of the planning process for EA1N and EA2. However, our letter is raising issues which are not about these projects in isolation. In fact it is the approach of looking at potential projects in isolation and not thinking ahead which has led to the issues to which our letter refers. Accordingly I felt these matters would be better followed up with you given your role in the Planning Inspectorate.

I am not going to reiterate the content of that letter here but the fundamental issue which it highlights is the failure so far to look at the potential cumulative impact of a whole series of potential NSIPs, all which are being proposed for development in a relatively small part of East Suffolk. It is that failure which has led to the situation where the cable route from Bawdsey to Bramford, which was intended under the relevant DCO to have a capacity of 3.6 Gigawatts, now being constructed by Scottish Power so it will only have a capacity of up to 1.9 Gigawatts i.e. just over half. As we stated in our letter of 3<sup>rd</sup> January 2019, if that cable route was being built with the original planned capacity under the DCO, there would be no need for a new cable route through an AONB which is now being proposed by the same developer, Scottish Power Renewables ("SPR"), for the EA1N and EA2 projects.

This raises many questions but for the moment it would be helpful if you could reply in substantive terms to the following.

1. Does the Planning Inspectorate regard the current outcome in relation to the Bawdsey to Bramford cable route, referred to above, as satisfactory?

2. What advice is PINS giving or planning to give to:
  - a. EDF in respect of its Sizewell C development (on PINS Programme of Projects although no project update meetings with PINS appear to have taken place since 13 November 2015)
  - b. SPR in respect of its EA1N windfarm project (on PINS Programme of Projects)
  - c. SPR in respect of its EA2 windfarm project (on PINS Programme of Projects)
  - d. National Grid Ventures in respect of its Nautilus Interconnector Project (please note National Grid Ventures made a presentation on this project to the Suffolk Coasts & Heaths AONB Partnership in December 2018)
  - e. National Grid Ventures in respect of its Eurolink Interconnector project (please note National Grid Ventures made a presentation on this project to the Suffolk Coasts & Heaths AONB Partnership in December 2018)
  - f. The consortium proposing to expand the Greater Gabbard windfarm (please note that on 4 October 2018 the Crown Estate announced its intention to grant rights to extend this project; the current onshore infrastructure being between Sizewell and Leiston)
  - g. The consortium proposing to expand the Galloper windfarm (please note that on 4 October 2018 the Crown Estate announced its intention to grant rights to extend this project; the current onshore infrastructure being between Sizewell and Leiston),

in respect of the potential cumulative impact of all these major projects given the proposals to build them over the next 10 years?

We are aware from published PINS meeting notes that there have been references to the cumulative impact of the SPR projects with Sizewell C and separately the cumulative impact of the SPR projects with the NGV projects, but there does not appear to have been any discussion of the cumulative impacts of SPR's windfarm projects, EDF's Sizewell C project or NGV's Interconnector projects taken together. The Greater Gabbard and Galloper extensions have been announced relatively recently but now they are clearly other developments which will be taken forward in the same geographical area and in a similar timeframe, as might developments in respect of the Crown Estate's Round 4; see further question 6 below.

3. Does the Planning Inspectorate think it reasonable that residents, their Parish and District Councils and their County Council, as well as a host of other local stakeholders, will have to respond to multiple consultations phases for multiple major projects over the next few years and beyond? The relevant developers appear to have no consideration as to the burden placed on residents and their health and wellbeing.
4. We note that PINS were concerned that the applications for EA1N and EA2 would overlap (see note of meeting on 20 June 2018). What is PINS view on the fact that the applications for some or all of the above projects will overlap?
5. Does PINS regard it as appropriate for DCO applications for all these projects be made (with all the work, consultation and expense that involves) so it will only be at the point of examination that the issue of cumulative effects will be determined?
6. Is the Planning Inspectorate aware that the Crown Estate has launched Round 4 in respect of more windfarm projects off the East Anglia Coast which will lead to yet more major

development proposals? The latest announcement on this topic was issued by the Crown Estate on 16 November 2018.

7. Does the Planning Inspectorate think it has any role, either formal or informal, in providing any input/advice in relation to the onshore impact of all these proposals either to the Crown Estate or the National Grid?
8. Is the Planning Inspectorate satisfied that National Grid is free to allocate onshore connection locations for offshore power cables without any consultation through the planning process? It is the inappropriate allocation of these connections which is at the root of most of the current objections to/problems with the current projects. At no time have SPR indicated that they are consulting on National Grid's proposals and National Grid have apparently failed to carry out any stakeholder engagement of their own.

In considering your answers to these questions you may want to review the attached map of the affected area which illustrates (from information provided by EDF, Scottish Power and NGV) the areas currently under consideration for the five projects referred to in 2(a-e) above. **It does not reflect the Greater Gabbard or Galloper proposals or developments which might be brought forward as a result of the Crown Estate's Round 4.**

Further we are familiar with advice note 17 so a simple reference to that will not be regarded as a substantive response to the questions above. Our questions relate to how PINS will discharge its functions in ensuring that applicants act in accordance with the terms of that advice note in respect of all the projects above. There is no evidence that SPR (or EDF or NGV for that matter) is properly considering cumulative effects in respect of the above projects.

We believe this number of potential major projects (at least seven and potentially more with Round 4) in one area in a similar timeframe is unprecedented. We would appreciate your comments on that.

#### **CONSULTATION DEFICIENCIES**

On a related matter the quality of consultation conducted by SPR in relation to EA1N and EA2 has been poor and the local community is extremely dissatisfied with the manner and content of SPR's consultation. This is a view shared by the local authorities. By way of example, in SPR's summary of the Phase 3.5 consultation it made no reference to the objections of the local authorities or those of the local MP! We have pointed out to SPR the deficiencies in the latest phase of consultation, Phase 3.5, and a copy of that letter was sent to the PINS email address for this project and is attached for reference. Again your comments would be appreciated.

I look forward to a substantive response.

Yours sincerely

Michael Mahony

cc Liam Fedden, Case Officer ([Liam.Fedden@pins.gsi.gov.uk](mailto:Liam.Fedden@pins.gsi.gov.uk))

Enc. Email from Liam Fedden dated 24.1.19, map of area, SASES letter to SPR re Phase 3.5 consultation