

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Re: Scottish Power Renewables East Anglia One North and East Anglia Two projects. Deadline 31st January 2022  
**Date:** 31 January 2022 20:50:26

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On 30 Jan 2022, at 15:21, louise fincham [REDACTED] wrote:

Our ref: 20023185 and 20023184

As this flawed permission for development consent continues it is clear that Scottish Power Renewables (SPR) has not submitted a credible plan to bring the power generated offshore by EA1N and EA2 onshore and connected to the national grid. The Secretary of State has now had to delay his decision twice in order to allow SPR to attempt to fill the gaps in its original submissions. These delays are on top of a three month extension to the hearings which represented another attempt to get SPR to sort out the mess of its original application.

A foreign owned company that cannot even submit proper plans for what will be one of the largest substation sites in Europe should not be allowed to pour an ounce of concrete onto our precious land. The volunteer groups who oppose the plans are trying to juggle their own work and families but have never missed a deadline.

The only benefit to this sorry process being dragged out further is that it exposes some of the critical flaws in the original submission. From the beginning campaign groups have unearthed plans that show that SPR is being used as a Trojan Horse to allow National Grid to build its own substations onto which additional projects such as Nautilus, Eurolink and Sea Link will be added. SPR claimed that there was insufficient information in the public domain to enable them to take into account the cumulative impact of these projects. This was not true even on the original timetable and it is certainly not true now as Nautilus has been writing letters to local landowners asking for permission to come onto their land to scope out their project. The failure to take cumulative impact into account has led to previous applications for onshore wind power infrastructure to be successfully challenged in the courts and we believe that there is a case for the same claim here.

The Secretary of State also identified gaps in the way that the presence of priority species had been examined by SPR. As in almost all aspects of the

DCO SPR either didn't conduct industry standard surveys, conducted surveys at the wrong time of year or inaccurately classified species and their habitat as being of "low importance". Arguments over whether or not the area around the Hundred River is "wet woodland" have gone around in circles when anyone with a basic habitat knowledge knows that the presence of Himalayan Balsam is clear and obvious evidence that the area is "wet", the presence of Himalayan Balsam is visible from the B1122 road, it doesn't require difficult or detailed surveying. The presence of protected species must be analysed before a decision to grant development consent is granted. SPR have failed to carry out adequate surveys meaning that their application is incomplete and flawed. The Secretary of State cannot therefore grant permission to go ahead with these plans.

The imposition of "gagging orders" on landowners affected by SPR's plans has been highlighted many times and yet the Secretary of State perpetuates the distortion by continuing to seek evidence only from those involved in the original DCO hearings. It has been pointed out many times to the planning inspectors and to the Secretary of State that the people with the most knowledge about critical issues such as flooding and biodiversity are the gagged landowners. This three month extension does nothing to rectify this fault and therefore the DCO remains fatally flawed.

In short the Secretary of State cannot grant consent to these plans. Cumulative impact, inadequate biodiversity surveying, inadequate flooding research and ongoing gagging orders in place with crucial parties mean that there is no choice but to throw the whole plan out and tell SPR and National Grid that they need to participate in the government's review into onshoring of offshore wind power and take a co-ordinated approach to the challenge. This will actually save time in the long run and enable power to be connected to the grid at a site close to the coast saving the cost of long inland cable corridors. There is no prospect of a nuclear power station being built at Bradwell; it is a perfect place for this infrastructure. National Grid, a privately owned company looking after shareholders, would of course rather dig up green fields that deal on a brownfield site but this attempt to save a bit of money must be stopped by the Secretary of State.

It is disappointing to say the least to note that the Secretary of State spent most of the day on Thursday, 27th January at Sizewell which is less than 1km from the proposed landfall site for EA1N and EA2. The village of Friston which will be destroyed by SPR's plans is an 11 minute drive from Sizewell and yet the Secretary of State did not even pay us the courtesy of a visit. I'm afraid that the fact that the Secretary of State was in the vicinity and yet chose not to come and see the sites that could be irreparably damaged by this decision suggests that he may have little or no regard for the people of East Suffolk, the precious and supposedly protected (ANOB, SSSI) land and the unnecessary displacement of priority species. We all want security of energy supplies and support Green Energy, but not at any price. Green Energy is not green when it involves the wholesale and unnecessary destruction of our land.

The other point which we would like to make about his visit is that he could not have sent a clearer signal that he will give consent to Sizewell C. This is relevant to cumulative impact in relation to Friston and Sizewell C and he may need to choose between the two as the overall impact of both would be intolerable and unmanageable for the area. The impact on Friston cannot be judged without regard to Sizewell, and vice versa.

Anthony & Louise Fincham

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