

Unique Reference No. EA1N IP: 20024031/ AFP 132  
EA2. IP: 20024032/AFP 0134.

Comments on Written Responses, Applicant's responses to EXA2 and other material submitted by Deadline 1.

**Summary.**

1. Wildlife and Ecology.
2. AONB and Heritage Coast
3. Public Rights of Way.
4. Visual Amenity/ Safety.
5. Noise.
6. Human Health/ Mental Well-Being.
7. Socio-Economic Effects
8. Traffic
9. Air/ Other Pollutants
10. Cumulative Impact
11. National Grid.
12. Coastal Change/ Landfall Cliff Stability.
13. Boris Johnson. Enhancement of the Natural Environment
14. Big UK Offshore Windfarms push risks harming habitats, say Campaigners.
15. 15.Book of Reference.

1. **Wildlife and Ecology.**

With reference to document APPENDIX J1 to the Natural England(NE) Deadline 1 submission, please note the following remarks in support of :

**Point 11.**

( Derogation tests. Habitats. RSPB.)

NE supports the RSPBs assertion that according to the DEFRA Habitats Directive, 3 tests must be met before approval:

1. There are no feasible alternative solutions to the plan or project which are less damaging.
2. imperative reasons of overriding public interest for the plan or project to succeed
3. That compensatory measures are secured to ensure that the overall coherence of the network of European sites is maintained. ( my emphasis ).

I support this position. The clearest feasible alternative is of course not to site Landfall and Cable Corridor construction in an AONB at a migration Landfall, the Ness, halfway between Minsmere Bird Reserve to the North and North Warren RSPB and the Aldringham Bird Reserve to the south. I refer later to the Applicants justification for this site selection.

Secondly, the concept of “coherence” is highly relevant to the ExAs considerations in this Examination, whether with respect to bird migration and habitats, the interrelated pathways and by ways, and the interrelationship of the multiple energy projects that are proposed in this small area. The Applicants desk- based responses address issues piecemeal; however the scope of these major projects, the sensitivity of the landfall location and the highly unusual context of the multiple projects planned for this area, at a time when the technology is in flux, require a wider contextual evaluation of the Application(S).

With reference to Ecological Impact, The Suffolk County Council Scoping Report states that the Applicants provide no data on Migrating birds, and that there is a significant lack of information on wildfowl, waders, woodcock and waxwing. The Applicant should provide such information. In my deadline submission I note that at Plots 10 and 13, Landfall and Cable Corridor routing, the naturally occurring ponds there are an attractant for

migrating birds arriving at the Ness, a mini headland, where they rest before their onward journey. This is nowhere addressed by the Applicant.

Point 12. Natural England Appendix J1 Deadline 1 Submission

( Onshore Ornithology Impacts.)

With reference to the Landfall site, and adjoining Cable Corridor works, NE supports the RSPBs comments concerning potential disturbance and loss of habitat affecting breeding woodlark and nightjar of the Sandlings SPA and turtle dove and nightingale populations associated with the Leiston- Aldeburgh SSSI... due to the proximity of ( those ) territories to the proposed cable route. Further information has been requested.

I emphatically support this point. As a tenant at [REDACTED] next to Landfall, we are familiar with individual returning families of woodlarks on fields adjacent to Landfall, turtle doves which have bred here for generations, and on the SPA next to the cable we could take you to the very trees to which the nightingales annually return. Their presence is an intrinsic part of this locality and the proposed clearance of copses and tree growth at this site will endanger that.

Point 24 . NE Appendix J1 Deadline1 submission.

Onshore Terrestrial Ecology and Ornithology.

NE supports Suffolk County Council (SCC )and East Suffolk Council (ESC )in their comments In relation to ecological receptors not... fully assessed ..or..insufficient mitigation/ compensation measures identified in Applicants ES in relation to bats, hedgerows, woodlands and trees during construction and (their disappointment) with lack of commitment to biodiversity net gain.

I fully support this view. Plot 10 and plot 12, designated for work and clearance of mixed trees and hedgerow are full of bats, which are highly active and visible. The scope of work proposed in this entire area and its probable duration will severely damage this population.

The Applicant's response indicates that it considers its original Environmental Statement in this respect to be adequate. I don't accept that assertion.

Points 41 and 42 NE AppJ1 Deadline 1 submission

(Onshore Ecology/ Sandlings SPA. Deer movement.)

I support Suffolk Energy Action Solutions (SEAS) and Save our Sandlings (SOS) in their contention that :  
*"The construction will cut Suffolk coast and AONB in half causing problems to migrating species and severing the wildlife corridor. Lost Woodlands will devastate the populations of badgers, red deer, invertebrates and other wildlife."* ( SEAS)

*" The project for EA1N and EA2 will drive cable routes the width of a motorway through the Suffolk Sandlings and this AONB landscape for 4 to 8 years which is a timescale that cannot be described as temporary. Wildlife will be negatively affected long-term and migration routes for birds and red deer will be cut in half."* ( SOS)

I have referred in my Deadline 1 submission to the routes of the red deer through plots 11, 12 and 13 towards the sea to access salty forage. That access will be blocked.

I emphasise the fact that we know that this massive cable corridor swathe will not be a temporary construction despite the impression given throughout its ES by the applicant. As described in Table 21.8 of Chapter 21 Land Use (APP-069), the Applicant defines temporary as less than 5 years; and this relates only to one project. These time periods have enormous significance for local animal and human populations.

Point 35. NE Appendix J1 Deadline 1 submission.

( Onshore Ecology).

Suffolk Woodland Trust highlights that semi- natural broadleaved woodland is a UK Priority Habitat under the classification Lowland Mixed Deciduous Woodland of “ high” and not “medium” importance, and therefore disagrees that the loss of 1.1 hectares is “low”, and its impact “minor adverse” .

SWT also notes that planting of replacement woodland is proposed as mitigation, the Applicant claiming “ no net loss of trees”, and that “ current measures proposed do not sufficiently address the impacts upon semi-natural woodland,” especially as no trees can ever be planted on the cable corridor route. Also, proposed hedgerow mitigation would take 5-7 years to re establish, and SWT express concern on the impact on the bat population.

I fully support this position, especially when taken in conjunction with the destruction of densely populated hedgerows.

#### Point 38 NE Appendix J1 Deadline 1 Submission.

Onshore Ecology.

NE supports the Environment Agency in its comments that water vole and otter surveys were undertaken during a prolonged period of unnaturally dry weather..( and that ) .. final surveys must be undertaken before the commencement of any works.

I support this position, and note that it highlights the wider question, encountered throughout these documents, of whether surveys conducted by the Applicant provide complete and reliable information and are fit for purpose.

## **2.AONB and Heritage Coast.**

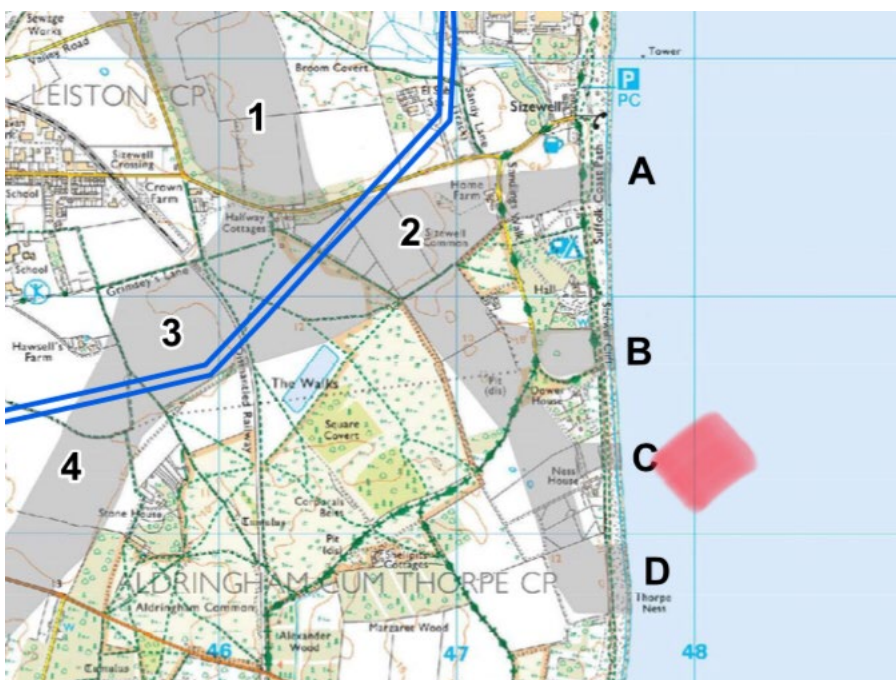
Points 25 and 26 NE Appendix J1.

a) Landscape and visual effects.

NE supports SCC and ESC comments with specific relation to the AONB ( Landfall and Cable Corridor location) on the impact on landscape and local amenity, heritage assets, noise and public rights of way ... When taken together..the significant adverse impact in respect of the sensitivity of the receiving landscape, local residents and visitors.

I emphatically support this view in respect of the AONB, and agree with SCC and ESC that the  
*“ inextricable link between the land and sea is fundamental to the special qualities and enjoyment of the AONB”.*

This should be highlighted with respect to the fact that this may be the precursor to Nautilus, Eurolink, and other projects arriving here, which would present a permanent loss. I attach a map issued by National Grid Ventures enclosed with a document of 22 September 2020 “An update on EuroLink Interconnector “ showing potential Landfall sites for Nautilus which indicates its intentions for the local and Landfall area.



(In respect of these proposed subsequent projects, would the Inspectorate please note points made later in this submission in relation to the refusal of NGET transparently to engage in this process. )

b) In the Draft Statement of Common Ground with Suffolk Coast and Heaths AONB partnership, it is pointed out (0.15) that

*“ The AONB partnership does not consider conflating Suffolk Heritage Coast impacts and AONB impacts as helpful and suggests separation of the two designations and impacts on those designations.*

*The language of this statement is confusing as it implies that the nationally designated ( by government) AONB lies within the ‘ defined’ ( by agreement between Natural England and the councils) Suffolk heritage coast. It is not. AONBs are conserved and enhanced by national legislation. Heritage Coasts by the Planning system.*

Here the language of the Applicant is ‘confusing’ in that it conflates the impact on the Heritage Coast and the impact on the AONB. This laxness is remarkable in respect of such significant proposed intrusion into these distinct entities. Can the Applicants proposals really be taken at face value when its statements are so inadequate, or misleading?

Many aspects of the Applicants engagement with issues relating to the AONB are troubling.

In the Draft SoCG with Suffolk County Council and East Suffolk Council, I support the statement that  
*“ Effects on the special qualities of the AONB within the SLVIA have not been accurately assessed. “ L.A-12.13.*

### **3. Public Rights of Way.**

William Halford points out in his Deadline 1 submission that the majority of 33 diverted ProW sections are in the Aldringham cum Thorpe area adjacent to Landfall and that section of Cable Corridor. This is where they are most needed, as for non drivers it isn’t possible to walk the busy B roads instead, and the public transport linking them is infrequent and, in my case, an hours walk away before path diversion.

In the draft SoCG ESC/ SCC, Table 31 ProW, LA15.02 Assessment Methodology states:

*“ The councils consider that access and amenity should be assessed as a subject in its own right rather than divided across different environmental statement chapters and consider that a single assessment should include both an assessment of the impact on the fiscal resource and on the quality of the experience that members of the public have when using the public right of ways such as the changes to views, changes to noise, air-quality, presence of construction traffic, loss of historical context and tranquillity.....*

*The councils consider that the methodology employed in chapter 30 is inappropriate for public rights of way. Using a methodology suited for tourism businesses and accommodation providers does not reflect the actual value and sensitivity of the public right of way network as a whole. **Users do not just use a single right of way, they use the interconnected network.** ( My emphasis).*

I believe this is key to the needs of all the towns and villages surrounding the AONB who use all the pathways for their daily business, to access work, family , friends, leisure and shops, and to the horse owners seeking to ride in a safe and accessible environment. This point has been made repeatedly and it is disingenuous to say the least to rely on the methodology referred to above; it demonstrates no interest in or familiarity with the area, or any desire to consider the well being and practical needs of local residents. I support this very strongly.

At LA 15.03 of the same document, in response to the Applicant’s statement concerning worst case scenario in respect of ProW, the Councils note that they:

*“ Cannot reach an informed view as there is insufficient information provided by the applicant as to the duration and timing of the temporary closures and permanent closures.”*

This is not helpful.

Please note that in relation to the Applicants obligations in respect of Bridleways during construction, the British Horse Society in its Guidance for Planners and Developers Policy Statement says that:

*Cables must not cross an equestrian route....*

*. Access for construction purposes should avoid bridleways or Byways as it is incompatible with equestrian use and routes should not be closed to equestrians so as to facilitate construction. Alternative construction traffic routes may be required.*

*. An assessment of routes and use patterns ( of bridleways) may be required.*

*. Restriction of construction traffic to roads or new tracks. Bridleways or byways must not become access roads. If this is unavoidable alternative equestrian routes should be provided and the surface of the bridleway or by way restored to one suitable for horses. This*

At LA 01.06, (Significance of Land Use) concerning whether the assessment of impacts for construction, operation and decommissioning presented for one project are accurate, the Applicant confirms that Land Use Clarification Note confirms that:

*“ The significance of the impact on permanent and temporary changes to local land use was incorrectly presented as minor adverse within the ES and corrects this ( sic) major adverse. (my emphases). The correction to the local level impact conclusions does not materially affect the primary mitigation identified “*

This is breathtaking. Minor adverse effect becomes major, but that makes no difference. IPs wonder how many such significant errors are buried in the Application, relying on the diligence of those adversely ( major) affected parties, and the ExA, to dig them out at personal and taxpayers' expense.

Further, in Exa Q1.9.21 , Outline Public Rights of Way Strategy APP – 581, the ExA states:

*“ paragraph 6 says that there are PROW that for in the onshore development area but will not have an interaction with the proposed... Project and therefore are not subject to temporary control measures. This includes the Suffolk coastal path PROW which crosses the onshore development area at Landfall. . Construction works... are underground works only specifically HDD therefore there is no interaction...and no temporary control measures are required.”*

The applicant is asked to explain

-a)what is meant by an interaction

b)to list the PROW

-c) explain the measures taken to avoid nuisance and ensure safety amenity and quiet enjoyment by those using them in the vicinity of the construction works with particular reference to the Suffolk coastal path and  
d) state where these measures are secured.

*The Applicant responds to a) no interaction means does not encroach.*

*c) and D): “to avoid nuisance, practical and effective measures will be implemented”*

Is this an answer? What does it clarify? What measures will be used? Practical and effective ones!

Each ProW interacts with every other. ProWs not directly adjacent to Landfall and Cable Corridor construction on the AONB near Sizewell/ Aldringham/ Thorpeness still interact with all the others, some of which it is proposed will be permanently or temporarily interfered with or closed. ( Less than 5 years); again, I refer to the comment made by SSC and ESC quoted above: **Users do not just use a single right of way, they use the interconnected network.**

What are these measures and when can we know about them? It's difficult to avoid the impression that the Applicant is not robustly and transparently engaging with the Planning Inspectorate in this process, and that the process thereby fails. Please do not accept these non- answers.

Again, in response to the ExA question ( Common Land Effects) 1.9.18 in respect of impact on access to Common Ground at Thorpeness Common, as the north and west sides will not be accessible, the Applicant simply re-iterates that Thorpeness Common can be accessed from the side not adjacent to the works, I.e the south, and again, does not in any way engage with the answer of effectually cutting off all pathway access from the North

and West, thereby preventing movement North to south. There is no progress or development in these answers, and I'd ask that the questions be posed again.

#### **4. Visual Amenity./ Safety.**

The visual blight upon this beautiful area will be immense and long term and has been addressed in detail by many IPs.

Section 3.3 of the outline CoCP( APP -575) states

*" land for CSS and HDD temporary working area will be securely fenced with hoarding, and access from the local road network, suitable for haulage equipment, will be installed along the onshore cable route to the drilling site.*

*During construction of the onshore cable route, fencing will be installed to demarcate the working area including cc: S and jointing bays. Fencing will be used where necessary; post and wire or similar will be used otherwise.*

At the Landfall site with its concomitant Cable Corridor work, at a site of Outstanding Natural Beauty, the Applicant will introduce continuous hoarding, a visual blight which will affect the entire walking and living experience in the area.

This highly sandy location is subject to intensely high winds and strong rain. It will be very difficult and invasive to secure hoarding in these conditions. I suggest that the proposed hoarding presents a risk to safety if detached, particularly to the horses at grazing in the fields directly adjacent.

The Applicant goes on to state:

*"All working areas shall be sufficiently and adequately fenced off from members of the public and to prevent animals from straying on to the construction areas. Species – Specific fencing may be prescribed where relevant.*

The Applicants proposed Landfall and Cable Corridor plots 4, 11, 13 and others are directly on the route of the annual red deer movements. The herd will be put at risk not only by the presence of the construction, but also by engaging with the works on its foraging route if the fencing provided is not species- Specific appropriate.

Will the Applicant also confirm that the fencing at Landfall and Cable Corridor construction will be species specific and safe for the horses in the adjacent field, who are likely to be alarmed by construction and run at fencing, risking injury to themselves?

#### **5. Noise.**

Chapter 25 of the ES Noise and Vibration section 25.6.1.1. states:

*" HDD has been assumed to be at the Landfall location for **24 hours a day** at certain periods. This has been assessed as having **negligible significance**. ( my emphases)*

There are households, a Charitable Trust for Children and grazing rights next to the 24 hour HDD at Landfall. How is it assessed that the significance for us is negligible? It has been pointed out elsewhere that horses are sensitive to vibration, and all parties will suffer from the 24 hour security light pollution and movement of personnel associated with this work. This impact has never been adequately addressed.

I have referred in my Deadline 1 submission in detail as to the Applicants failure to conduct any proper noise survey at this entirely peaceful location, despite information the landlord that it was preparing to do so. A survey appears to have been done not at THE COACH HOUSE here at Ness, but at a holiday cottage nearby with the same name. Noise disturbance here is going to be significant without any assessment having been made. Can the Inspectorate please seek further detailed clarification on this point.

It is understood that:

*" construction phase noise will be controlled through production of a construction phase noise and vibration management plan post consent"*

This will be too late

. In respect of the likely circumstance that work will regularly proceed 24/7, based on testimony from residents at Bawdsey, I support the following statement of ESC and SCC in the Draft SoCG LA.09.19 in relation to the scope

and extent of “ essential activities “ outside normal construction hours ( which) include some activities and process which carry the potential to result in significant noise and vibration effects. The Councils request: *“ commitment confirming that potential noise/vibration impact of nighttime working will be considered prior to any such works“*

Here at the Landfall site we will be totally exposed to such activity , as apart from the copses which SPR propose to cut down, there is nothing on this entirely open land to prevent the sound from carrying. Again, we are potentially facing this circumstance for years.

I support William Halford in his Deadline 1 submission. (60).

*I am concerned regarding the adequacy of the applicants noise assessment which I suspect underestimates the construction noise at certain receptors along the cable route and at CCs . . It is not possible to provide evidence owing to the non-disclosure of the Applicant’s assumptions regarding sources of noise nuisance or his workings and calculations.*

## **6.Human Health and Mental well- being.**

It will be obvious to the ExA from the volume and scope of representation from IPs in this Examination what a detrimental effect this proposed development is already having on the local population. The effects go way beyond a fear for the value of property of property or reluctance to engage with the need for Wind Energy. It is these specific projects and the implication of projects that will further capitalise on them that we do not support. The methodology of this Applicant throughout the Consultation Process, with which many of us have been involved, to date, increases alarm with its errors and omissions, and the very act of engaging with the Examination is challenging, although we recognise the Inspectorates attempts to mitigate that.

The Applicant, however, dismisses our very real concerns about noise, traffic, air pollution , interference with free movement , water interference, dust, light pollution, loss of natural habitat, diversions and footpath closures as “ **perceived** “rather than “**actual**”, and assesses the cumulative effect on mental health, as in so many areas, to be “**negligible**”. ( William Halford, Deadline 1.)

I can assure Applicant and the Inspectorate that this is very far from the truth. The reality for many close to Cable Corridor, Landfall and Substation will be, as W. Halford states, intolerable.

## **7. Socio Economic Effects.**

The highly detrimental effect on tourist commerce is addressed by many others, and is not recognised by the Applicant. 7 or more years of interference with the footpaths essential to tourism and the draw of the AONB, along with traffic congestion arising from the absence of a co- ordinated traffic plan, will make this a no go area, as pointed out by William Halford.

In response toExA Q 1.17.6 in respect of the impact of wind farms on tourist activity, The Applicant answer that its estimate that 99.72% of visitors “ do not hold strong enough opinions” was based on a Trlp Advisor Survey. Is this the technical detail upon which consent is sought ?

Is that based on already – constructed windfarms out at sea, or trying to walk across an AONB through potentially years of industrial work? Please seek adequate data to support the justification for such negative impact on local livelihoods.

## **8.Traffic.**

The non- existence of an adequate traffic plan has been well represented by IPs throughout.

My remarks here are deal mainly with the Issue of the proposed Haul Roads across the AONB.

There is still a lack of information on which delivery route to Landfall is to be used. This haul road in itself, from the busy Sizewell Gap Road, proposed as a mitigation measure because the Applicant had not originally identified the problems with its original assessment of the approach by the Aldeburgh roundabout, will be immensely detrimental to habitat and the free movement of individuals and wild life across the pinch point of the AONB. William Halford:

*The local road network between the A12 and the coast is clearly inappropriate for use by construction traffic engaged in such a major project. That this has been recognised by the Applicant is evident in his proposals to send so many*

*tracks and other vehicles along Haul Roads instead of narrow and bending B class rural roads. The consequence would be to transfer a severe environmental blight to those homes adjacent all close to the proposed Haul roads ( and the AONB). we ask the ExA to recognise that the local area cannot sustain such a burden and over so many months and years and also that the use of Haul Roads for such volumes instead is not acceptable. ( My emphasis and insertion).*

I fully support this point, and W. Halford's further points at Deadline 1 in respect of how it is proposed workers and HGVs are to access Landfall:

*both categories should be required to use the existing public roads where practicable rather than a Haul road. (107).*

*Regarding access to consolidation sites there is a statement that construction traffic is proposed to be routed to the consolidation sites, and there after the majority of construction traffic would be carried along temporary access roads, onshore cable route haul road and onshore cable route and substation construction access haul road. (108)*

*From this it would appear that the intent is to direct as much construction traffic as possible along the haul road, rather than along public roads. That strategy will be unacceptable to residents living close to the whole sites and is not explained or quantified with any clarity. (109).*

It is entirely unacceptable HGV and personnel and worker traffic should further compromise and damage the AONB in such close proximity to protected sites. Pollution and noise will further harm wildlife not already directly impacted by construction. . This volume of traffic will have a detrimental effect on existing local traffic including delivery vehicles serving the properties here not on mains gas or oil, and emergency services. Can the ExA take into consideration that this impact, over the course of years, will destroy the rare Sandlings and AONB for good?

#### **9.Air/other pollution.**

I and others have elsewhere addressed the unsuitability of such works in an area ( Landfall) prone to dust storms, and the impracticality of the Applicant's proposed mitigation of covering cable corridor works with plastic sheeting, another visual and aural blight, and a danger to wildlife, horses and human safety when becoming detached in high winds. In the Applicant's response to RRs in respect of wind- blown dust, it states

*The implementation of mitigation measures which are commensurate with dust risk... should result in impacts that are not significant.* ( My emphases).

Not adequate.

I support the concerns of SCC and ESC expressed in the SoCG at LA 04.34 in respect of dust nuisance caused by *Site clearance/ demolition work/ remedial work/ highway alterations.*

Evidence from a resident adjacent to Bawdsey Landfall site reports constant sand and dust nuisance inside and outside his home. This is an area where residents choose to spend most of their time outside, especially in summer, in gardens, riding, cycling or walking. Local dust nuisance will mean closed doors and windows, while noise pollution will drive those close by indoors.

I note that at Claydon on the Cable Corridor route for the earlier SPR Windfarm project in this region , a local trading site had constant problems with collapsed mud slides blocking access to the site, and coating the road, as a result of inadequate weather management. Does the ExA consider these problems to be properly addressed ?

#### **Hazardous substances.**

I support SCC and ESC at LA 02.15 of the Draft SoCG in its remarks on the risk of NOx emissions, and their *Depositions arising from Haul Road construction vehicle movements.*

/

I have addressed at Deadline 1 my strong concerns about the aquifer supplying our private water supply which underlies this entire site ( full details of licence provided by Alexander Gimson for Elpeth Gimson AFP 042 (EA1N) .

Is it acceptable that these emissions and other noxious substances should interfere with that supply?

#### **10.Cumulative Impact.**

With reference to document APPENDIX J1 to the Natural England Deadline 1 submission, I support point 28.



With reference to Chapter 5 E1A Methodology Environmental Statement (APP 053 ) para 86.

It is clearly highly significant that the Applicant has been able to avoid taking account of the cumulative impact of EA1N , EA2, and several other projects already sufficiently advanced to be planning on the basis of a Grid Connection at Friston, a crucially flawed process which I understand arises from exploitation of shortcomings of PINS Advice Note 17.

The ExA must recognise the implications for this local region and rectify this.

### **11.National Grid.**

In the light of the preceding remarks on Cumulative Impact specifically, I understand that National Grid have stated that they will not attend Issue Specific Hearings 1 and 2 and have evaded direct answers to the ExAs written questions.

I strongly challenge this. How is a fair and thorough Examination to take place when such a significant figure within the process simply refuses to participate ? How can the full extent of the Examination in respect of additional connections be known ?

I support SEAS in “respectfully calling for the examining authorities to enlist the support of the Secretary of State to then insist/ summon/ or subpoena or by whatever means, to get National Grid Electricity Transmission to attend the Issue Specific hearings and to answer the ExAs written questions in full, in particular questions 1.0.16 and 1.0.17 with reference to all six additional energy projects that have been put on the table.

Confidence will be lost in the NSIP Examination process should pins not bring National Grid to account on these and other outstanding questions.”

NGET cannot be allowed to act with such a remarkable lack of transparency .

### **12 Coastal Change and Landfall Cliff Stability.**

Point 29, SoCG, SCC and ESC.

SSC and ESC seek further information concerning cliff destabilisation and requires that detailed design of the works is submitted for approval before construction commences.

Points 39,40,43 SoCG, SSC and ESC.

The Alde and Ore Association, SEAS and SOS address destabilisation of the cliffs at Thorpeness. I and many others intimately familiar with the area have addressed these concerns elsewhere, as we note the constant and dramatic change in the shape of the cliffs at Landfall and the southern adjacent area, especially as global warming accelerates tide movements and flooding, as quoted in the Intergovernmental Panel on Climate Change to which I refer in my Deadline 1 submission.

Here I introduce comments made in the WR for Deadline 1 submitted by SEAS:

*4.2. There appear to be no Physical Surveys on Coastal Erosion carried out by the Applicant and the data relied on is often out of date.*

*(4.3.1,2,3: Examples of evidence used in DBAs for Appendix 4.6).*

*4.4. The most recent surveys cited are a decade out of date. With a landscape that changes on a weekly basis, referring to a study conducted in 1981 to inform a desk – based assessment could be considered ignorant of the reality of the area.*

In 4.6.1 the Applicant is quoted: “ *beyond the shoreline position of the Ness, the backshore berm decreases rapidly in width and and the cliff is steep and **slowly eroding**( SEAS emphasis).*

4.7 states *This conclusion is at odds with the findings of Karen Thomas, head of Coastal Partnership East, who says “ Suffolk has some of Europe’s fastest eroding coastline along with Lincolnshire.”*

I support these remarks.

In my submission for Deadline 1 I also referred to the ExA WQ1 Vol2 .10.19, *please explain the specific rationale for the location of Landfall North of Thorpeness in an area prone to coastal erosion, in circumstances where other Landfall locations may have been available* “.

I note the Applicant’s response refers to reasons of construction and cost, fails entirely to address in detail the other Landfall locations ( that ) may have been available or indeed to identify them at all. Bearing in mind that this is a statutorily protected AONB, upon which one of the criteria for industrialisation is that there are no other options available, one of the nationally unique features for SPR of this protected site appears to be that it “*can accommodate onshore cable requirements for both the projects*” ( although we don’t know compared to which other sites, or why they could not), and that it will “*avoid impact on Coralline Crag formation*”.

When sites such as Bradwell are available, it is remarkable that the Thorpeness site closest to the Coralline Crag is the most suitable for avoiding impact on the Coralline Crag

The Applicant continues that the Thorpeness Landfall site affords “ *sufficient space to accommodate set- back from the cliff line to reduce risk associated with coastal erosion.*

Again, remarkable, to select a site as most suitable for avoiding coastal erosion which is identified above as part of the fastest eroding coastline in England along with Lincolnshire.

Further, in my deadline 1 Submission I questioned whether, given the reliance on inadequate and outdated desk top analysis of the rate of erosion, the estimate of 30m distance landward to begin HDD would be adequate based on a 100 year projection.

I have a very basic grasp of these issues, but can the Inspectorate truly consider these adequate responses to this absolutely crucial question? I’d say that the Applicants answer fails to address the question of its “*specific rationale*” in respect of the Thorpeness site selection at all, and urgently ask for proper justification of this Landfall site selection and clear illumination of the other possible sites, and how they compare to this one, given the sensitivity of its location, in detail.

In his Deadline 1 submission, William Halford refers to a number of relevant selection principles laid out in the Applicant’s 6.1.4 Environmental Statement – Chapter 4 – Site Selection and Assessment of Alternatives (APP 052) in para 4.9.2.1 (165). I strongly suggest that of points a) to j) there, the criteria at a,b,c,d,e,g and j are by no means being applied . Will the Inspectorate review the Applicants answers in Deadline One in relation to these points.

### **13. Boris Johnson. The enhancement of the natural environment.**

On 28 September 2020 Boris Johnson made a commitment at a virtual UN event to increase the amount of protected land in the UK by 30% by 2030 and prevent biodiversity loss, and to reverse losses in the natural world. (BBC News online).

*We can’t afford dither and delay because biodiversity loss is happening today, it is happening at a frightening rate. If left unchecked the consequences will be catastrophic for us all.*

2 days ago it was announced that a further £40 million is to be ploughed into the green spaces of England as part of a plan to restore species and combat climate change (BBC News Online).

This need not be incompatible with a commitment to Offshore wind. It simply highlights the need for the two green aspirations to work in synergy.

The current proposals for EA1N and EA2 are not appropriate in this setting and at this time. They will destroy the environmental treasures that we are all recognising that we need to protect.

### **15. Big UK Offshore Windfarms push risks harming habitats..**

According to an article in the Guardian Saturday, 14 November 2020, a group of 18 leading environmental organisations, including the RSPB, Friends of the Earth and the Wildlife Trusts, have written to the Prime Minister to call for better coordination in windfarm planning that would insure a minimum of disruption to sensitive coastal sites. The groups warned that “the current planning system was not fit the purpose as it failed to take the strategic view of how such infrastructure could be accommodated in a way that allows fragile and degraded ecosystems to recover from disturbance. Offshore wind infrastructure can be designed sensitively for nature if a transparent system of strategic and spatial planning of future offshore wind and associated grid infrastructure is put in place, wrote the conservation chiefs.

They do not want to place curbs on the number of offshore Windfarms or turbines, but called for better planning and communication among the local authorities and central government. Each new development must be planned in the light of better mapping and data about the habitats affected and the cumulative effects of multiple activities.

If there were more coordination among windfarm developers and local authorities, fewer onshore construction sites substations and other structures may be needed, without reducing the number of turbines at sea.”

Please respond to these timely developments.

#### 16. Book of Reference omissions/ errors.

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ExQs 1	Question to:
	<p>i) inflation rates, and interest rates</p> <p>How do you see these risks manifesting themselves over the lifetime of the project, particularly in relation to</p> <p>a) the standard risks inherent in your global and renewables businesses;</p> <p>b) project viability; and</p> <p>c) your ability to finance, construct and operate the project over its lifetime?</p>
1.3.63.	<p><b>The Applicant</b></p> <p><b>1 2</b></p> <p><b>Book of Reference (BoR) [AS-005]</b></p> <p>It has come to our notice that there may be persons with an interest in plots 12 and 14 who are not listed in the BoR. In particular, we have received representations from persons occupying 1 Ness Cottage, adjacent to Ness House who, we understand, have a right of way over plots 12 and 14 in order to obtain access to 1 Ness Cottage. There may also be other parties with a right of way over these plots to access property near Ness House, and other parties more generally.</p> <p>Please undertake diligent inquiry and explain the current position, if necessary updating the BoR</p> <p>a) to include all persons with an interest in plots 12 and 14; and</p> <p>b) to include any other new interests</p>
1.3.64.	<p><b>The Applicant</b></p> <p><b>1 2</b></p> <p>Please ensure that the BoR follows the latest version of Government Guidance "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land", including Annex D which deals specifically with guidance on the BoR: for example please ensure that in the BoR:</p>
82	

The ExA identified us as tenants of Ness House Cottage as having an interest in Plots 12 and 14.

I do now appear in the latest re- iteration of the Book of Reference, not as a tenant but as having Category 2 Rights, but the other tenant does not appear at all. He is involved in this process as an IP and an AFP. An email requesting the inclusion of his interest to the Land Agent at Dalcour MacLaren has received no response.

Would the ExA request that this is amended for the next iteration of the BoR, and that we are both entered as tenants?

I also note that the updated BoR still lists both of the holders of grazing right as having an interest in Plot 10. This is incorrect. I have confirmed this with the Land Agent who, after reference to the agent for the Landlord, has accepted this error.

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Would the ExA request that this information is also corrected in the BoR?

Tessa Wojtczak.