

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two](#)
Subject: Deadline 3 - Post ISH2 hearing submission including written submission of oral case - IP 20024016 and 20024017
Date: 15 December 2020 18:33:11
Attachments: [Post ISH2 hearing submission including written submission of oral case - IP References 20024016 and 20024017.pdf](#)

Dear Case Team,
Please find attached my "Post ISH2 hearing submission including written submission of oral case"

Regards,
William Halford

SASES IP Registration identification numbers

20024016 (EA1N)

20024017 (EA2)



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The Planning Act 2008

East Anglia ONE North (EA1N)
East Anglia TWO (EA2)
Offshore Wind Farms

Planning Inspectorate References: EN010077 and EA2 : EN010078

Post ISH2 hearing submission including written submission of oral case

Submitted for Deadline 3 (15 December 2020)

Interested Party: William Halford

20024016 (EA1N)
20024017 (EA2)

1. Introduction

This is further to my participation in ISH2 on Wednesday 2 and Thursday 3 December 2020 with regard to

Agenda item 3 c) Justification for the proposed cable alignments

Agenda item 4 Evaluation of the proposed cable alignments including in relation to corridor widths

This document contains:

Section 1 Introduction

Section 2 My oral submission to ISH2 with clarification and references where appropriate

Section 3 Additional comments relevant to or arising from ISH2 Agenda items 3 c) and 4 a)

I refer ExA also to my earlier Relevant Representation [RR-388] and Written Representation [REP1-393].

2. My oral submission to ISH2

2.1 Day 1 Agenda item 3 - Strategic siting – approach

3 c) Justification for the proposed cable alignments – was this as a result of the chosen landfall and substation locations? What rationale was used in the decision-making process of routes or ways to link up the chosen locations?

Re: The Aldeburgh Rd, Aldringham B1122 onshore cable corridor crossing ‘Pinch Point’

1. If (as the Applicants have suggested) there exists no other feasible crossing point that could enable cabling to reach Friston, then its selection should be considered as a Strategic Siting issue when ExA considers the validity of the Applicants’ Site Selection processes.
2. NPS EN-1, 3 and 5 the Cabling Corridors, EN-3 Para 2.6.3 states “For clarification, any reference within this NPS to offshore wind farm infrastructure includes all the elements which may be part of an application, including cabling.
Although some of the environmental and human impacts of onshore cabling and haul roads are said to be temporary (during construction), impacts on residents, wildlife and woodland at B1122 would not be temporary in view of a possible in combination timescale of up to 9 or 10 years, that being the remaining lifetime for many residents and for several future generations of animal life.
3. Mr McGrellis on behalf of the Applicants asserted at ISH1 that the Cable Route was not an afterthought but an integral part of Site Selection. I have found little if any evidence of this with regard to the B1122 crossing place in EIA Chapter 4.
4. Mr Martin on behalf of the Applicants presented a Site Selection ‘storyboard’ titled Onshore – Strategic Site Selection Presentation [AS-066].
Slide 6 states “*The Original study area did not go west of B1122 to avoid interaction with woodland and residential titles*”. The word Interaction implies a two way process. The correct words would have been to “avoid damaging impacts on woodland and residential titles”
5. Slide 13 stated that the Applicants were later looking for substation sites west of B1122. Presumably by then the Applicants no longer considered woodland and residential titles to be a factor.
Please could ExA determine why not? What had changed?
What evaluation was made of impact on residents close by, now within 20 metres of the order limits?
There is no evidence that a buffer zone selection criterion was applied in the selection of a crossing place and the Applicants have continued to resist the Local Authority’s requests for mitigation

measures to protect residents in Fitches Lane and Gipsy Lane – see Applicants’ Comments on Local Impact Report [REP2-013], page 36, paragraphs 19.34 to 19.35.

Further, up to c. 0.9 Ha of deciduous woodland adjoining the West carriageway of the Aldeburgh Road would be sacrificed including a Group Tree Preservation Order area that residents had fought to defend over many years.

6. Similarly, the Applications do not recognise the value of up to 0.9 Ha of riparian woodland on the East side of Aldeburgh Road. They do not specify reduced width or replanting of trees there.
7. The route west of the Aldeburgh Road through the central point of Aldringham was only required in the event that one of the western zones was chosen and yet the Applicants stated that an Expert Topic Group had decided on a road and river crossing place there in summer 2017, prior to the Project Scoping Reports and long before formal Site Selection in 2018.
Could ExA please investigate this timing discrepancy?
8. No evidence has been presented that any other crossing points were ever considered and EIA Site Selection Reports do not consider the feasibility or options for crossing Aldeburgh Road.
No further attempt was made to look at other potential crossing points after SPR had reduced the specification for the cable corridor width at Aldeburgh Road [including haul road(s)] from 50 m to 27.1 or 16.1m.
9. A letter from the Local Authorities to the Applicants dated 17 April 2018* stated “It is important that the cable corridor can accommodate both SPR and National Grid projects and that if this cannot be achieved or will present significant loss of amenity then those site options should be dismissed”.
*Reference: Page 4 of:
<https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/SPR-Formal-Stage-1-response.pdf>
10. Mr Innis speaking on behalf of the Applicants on ISH2 Day 1, Agenda item 2 d) admitted that discussions between the Applicants and NGV have been ongoing (pre- and post-application), “in order that matters relating to the design of these two projects would not compromise a future connection at Friston”.
A Draft Statement of Common Ground between the Applicants and NGV dated 2 Nov 2020 [REP1-062] mentions no outstanding points of disagreement on any subject.
If the Aldeburgh Road pinch point is indeed the only feasible crossing point to the West, it would have been a dereliction of NGV’s duty to its shareholders had it not found opportunities to ensure that there would be sufficient room there for its own Interconnector cables, alongside the Applicant’s EA1N and EA2 cable trenches. On its own part, SPR would have been mindful of its own commitment to PINS at a S51 meeting with HM Planning Inspectorate on 25 March 2018 not to sterilise NGV’s ability to develop its projects.
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-Advice-00015-1-EAST%20Anglia%20ONE%20North%20Meeting%20Note.pdf>
11. Could the Applicants’ motivation for not having revisited its selection of the Aldeburgh Road Cable Corridor crossing place, once the width required there had been reduced from 50 metres to 27.1 metres, have been a desire to ensure sufficient cabling width would be available for the NGV project(s)?
I believe ExA is justified now in seeking an explanation from the Applicants as to why its full reasoning has not been declared within the EIA.
Therefore, I respectfully suggest that the Applicants be required to release copies of previous correspondence between the Applicants and NGV regarding onshore cabling and to make them available for scrutiny by ExA and Interested Parties. Such meetings and correspondence should have been transparent and referenced in the appropriate Site Selection reports.
12. A 92 metres width of land is available within the Order Limits on both sides of B1122 between Fitches Lane and Aldringham Court’s southern land boundary. Even at this late stage, the

Applicants have provided no indication on where the 16/27 metres tranche of cabling would be positioned, except to say that only 5 metres of woodland would be preserved between Fitches Lane Ref 6.1.4 Environmental Statement 4.9.2.2 (171) [APP-052]. Is that a further indication that there is an intention to install EA1N and/or EA2 cable trenches as close as possible to Fitches Lane in order to enable other Applicants including NGV to install their HV cabling at the same pinch point?

13. PINS Advice Note Nine on Rochdale Envelope requires an Applicant *"to bring forward the level of detail to enable the proper assessment of the likely environmental effects and necessary mitigation, if necessary considering a range of possibilities"*. It would appear that the Applicants have not complied with respect to the above at the B1122 cable corridor crossing place, since neither the orientation of the corridor's component parts nor its approximate positioning within the 92 metres wide order limits have been specified.
14. I ask ExA to consider whether the Applications would be valid in the event that they are found to have catered for the requirements of other Developers' potential projects without disclosure of such in the submissions.

2.2 Day 2 Agenda item 4 - Local siting - impacts and mitigation

*4 a) Design and impact of the proposed landfall **and cable alignments** on: a. the Suffolk Coast AoNB, b. Heritage Assets c. Public Rights of Way (PRoW) and local landscape implications. The above discussions will include but not be limited to the following issues: evaluation of the **proposed cable alignments** and effect on relevant interests, including in relation to **corridor widths**. Following on from Agenda Item 2, the ExA may wish to draw upon any issues that have arisen during the ISH to also examine any cumulative impacts, **including timetables for development and the potential for overlap and possible wider impacts arising from the proposed substations and grid connection site.***

Re: The Aldeburgh Rd, Aldringham B1122 onshore cable corridor crossing 'Pinch Point'

15. Mr McGrellis (for the Applicants) confirmed that a reduced 27.1/ 16.1 metres wide cable corridor on both east and west sides of Aldeburgh Road would be all that was needed for agricultural and engineering purposes and would be contained within the two Construction Fences. He stated that the 92 metres order limit width has been specified in order to make provision for the purposes of 'Micrositing' later on. He did not explain the Applicants' reasons for retaining only 5 metres of the 92 metres of woodland available between Fitches Lane and the Cable Corridor. He stated that the Applicants would apply the same 'logic' on both sides of Aldeburgh Road, constraining the cable corridor within a maximum width of 27.1/ 16.1 metres, every effort being taken to preserve trees and hedges.
16. The Applicants intend to replant all trees removed during construction, except for those within tree root distance from cabling where heathland would be established. It was unclear whether that is also the intention on the riparian land on the flood plain to the east of Aldeburgh Road (presumably unsuitable for heathland).

3. Additional comments relevant to or arising from ISH2 Agenda items 3 c) and 4 a)

3.1 Cable Route Optioneering and Engineering Feasibility Reports

17. EIA Onshore substation Site Selection RAG Assessment 6.3.4.2 [APP-443] states that the process of the onshore cable corridor routing would be captured in a separate subsequent cable routing

‘optioneering’ exercise. The Applicants have not provided such a report to justify a cable route options at the Aldeburgh Road, Aldringham ‘pinch point’.

18. EIA Site Selection and Assessment of Alternatives 4.9.1.3.4 [APP-052] states at 146: “Following an ‘engineering feasibility review’, it was deemed feasible to cross Aldeburgh Road if woodland was removed immediately west of Aldeburgh Road, north of Fitches Lane. Early engineering work has allowed the Applicants to commit to an onshore cable route width of 16.1m (for one project only) or 27.1m total width for both projects”. Prior to that decision, the width required for both wind farms had been specified as 50 metres.
19. It may be possible to become better informed about the Applicant’s processes and assessments in choosing this crossing place should the Applicants be required to release its reports on the ‘Optioneering Exercise’, the ‘Engineering Feasibility Review Reports’ (both referred to above) and also an Assessment of impact of Cable Route on residential titles near Aldeburgh Road (if available) and making them all open to scrutiny by ExA and IPs.

3.2 Timetables for Development and the potential for overlap (not discussed at ISH2)

20. The Applicant’s response to ExQ1 1.4.1 [REP2-062] has considered only two scenarios : concurrent or sequential implementations. The Applicants have applied in Draft DCO for a 7 years’ time limit to commence work. Consequently, in the event of Scenario 2 (sequential project implementation) and given the Applicants’ pessimistic prospects of winning sufficient funding through the Contracts for Difference process as expressed in its response to ExQ1 1.4.15, a worst case scenario might be : Project 1 Starts : Year 1; Project 2 starts : Year 7. Assuming project duration (each project) of 3 years, a worst case ‘In Combination’ Start-to Finish duration (both projects) might 9 years.
21. Consent for both projects must take account of onshore environmental and human impact, for which the least worst case would most probably be concurrent (Scenario 1). The Applicants should be required to assess impacts for Scenario 2 in quantitative terms, although it is clearly not practicable for the Applicants to model every possible overlapping projects phasing scenario. However, it should be possible to exercise the Applicant’s computer based quantitative models for a Scenario 3: Work on Project 2 to commence say midway through Project 1 development timescale and thereby to predict cumulative forecast data such as:
 - Peak resource requirements by type
 - Construction and transport traffic peak volumes
 - HGV junction waiting times
 - Predicted noise at sensitive receptors

Should both projects be consented it should be on the condition that only those timing scenario(s) with the lesser impacts can prevail.

END