

From: [REDACTED]
To: [East Anglia Two](#); [East Anglia ONE North](#)
Subject: Deadline 4 copy. Revised, small significant amendment. Final version.
Date: 13 January 2021 20:09:10
Attachments: [Deadline 4 copy.pdf](#)

To the team,

My apologies.

I have submitted this document already, but note a significant error of one word which this version amends.

At Point 2 I have said that

“If such agreement with the Planning Authorities has not yet taken place, I would suggest that it is “appropriate “ to gain legal rights over the private land, specifically Plot 10 which is in use, in advance of such planning authority agreement and, indeed, Consent. “

This should read

“ if such agreement with the Planning Authorities not yet taken place, I would suggest that it is **not appropriate** to gain legal rights over the private land , specifically plot 10 which is in use, in advance of such planning authority agreement and , indeed, consent.

I hope you can use the amended version.

Again, apologies.

Kind Regards,

Tessa Wojtczak

Sent from my iPad

To the Planning Inspectorate.
Deadline 4 notes and responses, January 13 2021.

PINS ref: EA1N. IP 20024031/ AFP: 132.
 EA2 IP: 20024032/ AFP: 0134.

These notes are in respect of East Anglia One North and East Anglia Two.

Topics addressed:

1. Cumulative Impact
2. Pre- Commencement Intrusive Archaeological, Geotechnical and Site Investigation works.
 - a) Compliance with Draft DCO Regulations and Outline Pre Commencement Archaeology Execution Plan
 - b) Contaminated Land and Groundwater obligations in respect of OPCAEP and Statement of Common Ground with the Environmental Agency.
3. Issue Specific Hearing 4.
4. Traffic.

1) Cumulative Impact.

In the course of ISH 2 Session 1 on the 2nd December 2020, Colin McInnes for the Applicant states at 1.06.17, in respect of the multiple other projects potentially planned to make Landfall in the area and connect with the proposed Substation at Friston,
Nothing has changed since we made the applications with these projects.....I think in short there's no Substantive information available in order for us to progress anything that would a look like a cumulative impact assessment..

To quote from NGVs latest written response with reference to Nautilus and Eurolink Multi Purpose Interconnector,
Initial routing and Siting work has been based on the reasonable assumption of a potential connection Location at the proposed Friston Substation. (my emphasis).

An email between Innogy and Leiston Town Council regarding the Galloper Extension says
We currently have an offer from National. Grid to connect to Friston which we are considering but have not yet accepted and the offer is subject to consent being received for Scottish Power's DCO for the East Anglia projects. (my emphasis).

East Suffolk Council's view of National Grids intentions:
The council maintains that (as) the NG Substation proposed by EA1N and EA2 is being considered as a strategic connection point for multiple projects.....

It appears inconsistent that where NGV can make reasonable assumptions, SPR is not able to recognise any information in the public domain which is an *important and relevant consideration*, and dismiss these future projects as *speculative and uncertain*.

The National Policy for Energy (EN-1) states that *when considering cumulative effects, the Environmental Statement should provide information on how the effects of the Applicants proposal would combine and interact with the effects of other developments.*

We know that the Examining Authority recognises this. And yet SPRs refusal to acknowledge or comply means that these highly significant impacts which will affect this area life decades leaving it permanently changed have not been included in this Examination.

The assessment of cumulative impact within this Examination should include not only Friston and the additional mooted Substations, but the Landfall and Cable Corridor. A 9 km cable corridor 60+ metres wide will need to be constantly redug to accommodate potentially 8 cable trenches for connection with the Grid at Friston, potentially more. (see Appendix 1 of SASES Response to ISH2 Action Points).

When one factors in current movement of government policy towards greater co ordination (BEIS review, Energy White Paper, NGs ESOs Offshore Co ordination report, it's meaningless to examine this project in isolation.

I urge the ExA to uphold their pledge to take all additional projects into account by

1. Requiring SPR to undertake a full Cumulative Impact Assessment of all known projects.
2. Undertaking a rigorous examination of the Cumulative Impact Assessment.

Please note that all primary stakeholders in this Examin, including The Rt Honourable Therese Coffey MP, East Suffolk Council, Suffolk County Council, Aldeburgh Town Council, Natural England, SASES, DOS and SEAS believe that the effects of these projects and associated impacts should be fully considered within this Examination. If this isn't undertaken now, there will not be another chance for our environment and existing communities.

2) Pre-Commencement Archaeological, Geotechnical and site investigations..

Intrusive pre-Commencement works at Cable Corridor site Adjacent to Landfall and Ness House..

- a) In the Applicant's Draft DCO as submitted to the Examination Authority (APP-023), Requirement 19 on page 39 states:

No intrusive pre-Commencement archaeological surveys, archaeological investigations or site preparation works in respect of such surveys or investigations may be carried out until a Pre-Commencement Archaeology Execution Plan (PCAEP)(which accords with the Outline pre-Commencement Archaeology Commencement Plan) in respect of those surveys, investigations or preparation works has been submitted to and approved by the relevant planning authority.

Intrusive pre-Commencement archaeological surveys, archaeological investigations and associated site preparation works must be carried out in accordance with the approved plan.

At the end of last year Dalcour Maclaren for SPR made a claim for a licence to carry out Archaeological, Geotechnical and site investigations relating to the Onshore transmission networks for the proposed EA1 and EA2 projects. These works are specifically referred to in discussions with the landowner, and in writing, as *intrusive*.

The investigations are to comprise boreholes, borehole / window sample water monitoring , cone penetration tests , trial pits and scores of trial trenches, and, closest to Ness House, will take place on plots 4, 10, 7, 11, and 13. They are to take place from February 2021 to June 2022.

The Applicant will require access routes for vehicles, and for the deployment of machinery and personnel as may be required, without specification, throughout this period.

These works would appear to fall under the obligations of Requirement 19 of the Draft DCO as referenced above. Further, in their Outline Pre- Commencement Archaeology Execution Plan (OPCAEP) (REP1-019) , 1.1.3 states

A final detailed Pre-Commencement Archaeology Execution Plan (PCAEP) will be produced prior to intrusive pre-commencement archaeological surveys, archaeological investigations or site preparation in respect of such surveys or investigations of the proposed East Anglia Two Project, and will be in line with this OPCAEP (as required by Requirement 19 of the Draft DCO). Once Archaeological contractors have been appointed , the final PCAEP measures would be further developed in consultation with the relevant regulatory authorities. (my emphasis.)

1.1. 4. States

The final PCAEP will be a key mechanism, enforceable by the DCO, through which the approach to onshore archaeology survey delivery, planning and management would be agreed with the relevant regulatory authorities.

Would the Examining Authorities please seek confirmation from The Applicant that the relevant detailed PCAEP has in fact been submitted to and approved by the relevant planning authority? Could details be provided? Can they also provide details of the final detailed PCAEP , and that on its basis consultation with the relevant regulatory authorities has taken place in line with The Applicants own commitments? Could the officer, or department with whom these negotiations have taken place be provided to the ExA and landowner?

Could the Examining Authorities seek clarification of the overwhelming justification of these works to be undertaken so long before Consent? In the light of the fact that these works will be highly invasive of Ness House Cottages, Wardens, and the surrounding environment for such a long period, it would seem that the involvement of the relevant planning authorities will be crucial in controlling and monitoring the deployment of unspecified quantities traffic, personnel, vehicles, equipment , generators and welfare facilities. A clear access plan will be necessary, as the adjacent tracks used for access to the residences are already in a very unsatisfactory state. Parking, lighting, fencing, safety, contamination, are all issues which need to be addressed in detail.

If such agreement with the Planning Authorities has not yet taken place, I would suggest that it is not appropriate to gain legal rights over the private land, specifically Plot 10 which is in use, in advance of such planning authority agreement and, indeed, Consent.

Further, 1.2 of the OPCAEC at bullet point 6 states that the document covers *liaison with Suffolk County Council Archaeological Service and Historic England*. Although I understand that this may refer to works post- Consent, Requirement 20 of the Draft DCO , Archaeology, states that no stage of the Onshore works may commence until for that stage a written scheme of archaeological investigation... has, after consultation with Historic England and Suffolk County Council, been submitted to and approved by the relevant planning authority.

- b) Requirement 18 (Contaminated Land and Groundwater) of the DRAFT DCO at page 39 again states, in reference to contaminants,

1) *No stage of the Onshore works shall commence until a written scheme applicable to that stage , to mitigate the potential for release of contaminants within the Order limits has, after consultation with the Environment Agency, been submitted to and approved by the relevant planning authority. (my emphasis).*

My question therefore is for the following bodies to confirm that such submissions and approvals have been granted, and consultations held in respect of these intrusive pre- Commencement

Geophysical and Archaeological Works at the Cable Corridor site next to Landfall, in line with the Applicants commitments:

Historic England
Suffolk County Council Archeological Service
Suffolk County Council
The Environment Agency

Failing answers from these bodies and any other relevant authorities, would the ExA require the Applicants to produce evidence of the consultations with these agencies?

3.13 of the same document, addressing Environment the Outline Pre-Commencement Archaeology Execution Plan, states:

The final PCAEP will include details of any hydrogeological risk assessments required to be taken in advance of intrusive pre-Commencement Archaeological surveys. (my emphasis).

I and other Interested Parties have repeatedly drawn attention to the Aquifer which supplies our community, erroneously identified as Unlicensed in the Applicants documentation. At Deadline 3 I commented on the inadequacy of the Applicants response to our concerns, and I drew attention to the undertaking in the Draft Statement of Common Ground with the Environmental Agency (REP1-077) (EA 109.

...a commitment to undertake a hydrogeological risk assessment for works that could cause changes to Aquifer flow or affect aquifer quality within 500m of groundwater dependent sites.

As a result of the sharp angle in the cable corridor bringing it within a few metres of residences and Wardens Charitable Trust, with no guaranteed buffer zone, where the intrusive Pre Commencement works are due to begin imminently, can the ExA ask for assurance that the hydrogeological risk assessment will take place, if it has not done so already?

We are very concerned that the Applicant fails to understand the nature of this Aquifer. It is in fact a vast expanse of Water, around 4- 5 feet deep and lying approximately 31 feet under the ground. It underlies the entire planned area of Landfall and adjacent construction, not just the vicinity of these houses. It is difficult to see how this supply will not suffer interference or contamination over the projected years of invasive works. It is likely that this enormous aquifer is the source of 50% of Anglia Water supplies (according to their website, 50% derived from groundwater and aquifers).

I would therefore ask for assurance through the Examining Authority that the hydrogeological risk assessment referred to in 3.13 quoted has been carried out as undertaken, and that if so it be made available in the Examination Library, if it is not already.

3) Issue Specific Hearing 4, Onshore Environment, Construction, Transport and Operational Effects.

I would ask that the above considerations in respect of compliance with Draft DCO Requirements and the OPCAEP and the Draft Statement of Common Ground with the Environmental Agency pertaining to the pre Commencement works be put to the Applicant at ISH 4, at the Examining Body's discretion.

I note also that permission has been granted by the High Court to challenge the Consent Order for Vanguard on the basis of concerns about the effects of cable corridor works in close proximity to human habitation, and ask the ExA to bear that in mind.

4) Traffic.

At ISH 2 Session 1, at 1.01.42, acknowledging that traffic was a critical issue, Colin Innes stated *we've had consultation with Sizewell since the pre- Application days.*

On 6 November 2018 I attended a meeting of Leiston Town Council at which Tom McGarry for EDF was present to represent Sizewell B/ C. A question was asked as to why the projects (Sizewell C/ SPR were not being co ordinated in respect of transport, traffic, routes etc.

Tom McGarry said that SPR has had the opportunity to see all Sizewell/ EDFs public information on traffic, so they should look at their time line and adapt. He hadn't seen anything from SPR. This doesn't sound like Consultation, and perhaps indicates why the issue of traffic is still so urgent.

The most recent documentation offered at deadline 3 is not illuminating. We don't know a great deal about the haul road at Landfall, or how traffic is to access the site. The Inspectors will see the conditions on the tracks and byways that serve the dwellings and businesses that are not on the main road and close to Landfall.

A major concern is that access should be clear and safe for essential gas and oil deliveries for those of us who are not on the mains, or near any main road. The delivery vehicles are obviously large, their contents volatile and precious, and their delivery schedules extremely crucial, especially in the long winter months; the companies are understandably extremely protective of them and will not allow them to deliver if there is the slightest risk or hazard on the route. We failed to receive a gas delivery because of an overhanging branch nearby. If diversions or the conditions of the by way challenge their access, they won't come.

This is clearly the case for emergency services, agricultural and other deliveries too, and applies throughout the entire road network nearby which is clearly unsuitable for large volumes of heavy traffic. The haul road itself, proposed as a mitigating factor when it was pointed out during early consultation that the Aldeburgh roundabout, creates a further problem with the environmental, ecological and aesthetic damage done to the AONB. It's clear that a large part of the population of Aldringham is going to be drastically affected by the works and the associated traffic. Others have made detailed representations on this point, which I fully support.

Would the ExA press the Applicant for a proper traffic assessment, with the cumulative impact of other projects appropriately addressed?

We appreciate that the complexity of these issues is generating a great deal of material for the ExA to process, but if these and all other issues put before them are not able to be fully scrutinised at this critical point, we will have no other opportunity.

Tessa Wojtczak.