



SAVE OUR SANDLINGS

Offshore Wind Farms
EAST ANGLIA ONE NORTH PINS Ref: EN010077
&
EAST ANGLIA TWO PINS Ref: EN010078

Deadline 6 Response
from
Save Our Sandlings

Issue Specific Hearing 7
Wednesday 17th February 2021

Biodiversity
&
Habitat Regulations Assessment

Agenda Item 2 Effects of terrestrial ecology

Section b) Other terrestrial ecology

I refer to responses from Claire Smith, Principal Environmental Consultant at Royal Haskoning DHV on behalf of the applicant. Following submission from Save Our Sandlings representative Richard Reeves concerning wildlife observations in the area surrounding Wardens and Ness House, Ms Smith concentrated her responses on the substation area especially with regard to no bats being recorded at this location and did not acknowledge our concerns of impact and intrusion upon bat populations in other locations.

Much mention was made of pre-construction surveys of the cable landfall area and along the cable route. Whilst we very much welcome these surveys, we are very alarmed at the reply to our question relating to adverse findings from these surveys within planned work areas. The following response, copied from the real-time translation, was given:

“ pre-construction surveys..... are undertaken with due care and timings to inform should they need to any changes to propose working methods, if in the instance for example, that active budget set (*sic*) is found slap bang in the middle for want of a better expression of where proposed cable works proposed, then we would be looking to seek for the destruction of said set. And in turn the implement the recorded sorry, the implementation of the required mitigation measures in order to satisfy Natural England's criteria in in seeking the destruction of said set.”

This is an extremely worrisome response. We seek further clarification from the applicant that mitigation measures avoiding and preserving badger setts in particular, as well as nest sites, roosts and co-existing habitats will be in place to prevent further loss of important wildlife species. Badger populations have been under threat for many years, especially following unproven links to bovine TB. If badger setts are discovered during surveys and there is no viable alternative to detour away from their location we request the cete or clan members are relocated to an alternative site and that no further work takes place until this has successfully been achieved. . Whilst no timescales have been indicated when these surveys will be undertaken insist are undertaken in sufficient time to allow all appropriate mitigation measures to be in place as a priority before construction.

Listening to the applicants submissions at previous Issue Specific Hearings, their responses to the many concerns raised by Statutory Bodies, Stakeholders and Interested Parties, we have very little confidence that environmental matters are very high on their priority list. The applicant appears to have very little appetite for change , instead adopting a ‘Carry-On Regardless’ mind-set and will not waver from their planned path. The Examining Panel have invited the applicant to consider alternative onshore construction proposals, especially with regard to multi-purpose interconnectors offshore, alleviating the need for such significant infrastructure on land. The applicant has resisted these invitations at each and every opportunity, quoting National Policy Statements and other statutory instruments to support their case. With regard to plans submitted to date, the applicant has a “We’ve started so we’ll finish” attitude with no apparent regard to environmental issues, recent published reports, the Dasgupta Review¹, the United Nations ‘Making Peace with Nature’², the UK Government

¹ [The Economics of Biodiversity The Dasgupta Review: Headline Messages \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671441/the-economics-of-biodiversity-the-dasgupta-review-headline-messages.pdf)

² [Making Peace with Nature](https://www.un.org/en/development/desa/indicators/2021-report-making-peace-with-nature)

Energy White Paper³ and the High Court judicial review decision overturning approval for Norfolk Vanguard⁴ offshore windfarm.

There is a welcome fresh wind of change blowing through the Renewable Energy sector, especially with regard to grid connections. Sources reveal the Secretary of State BEIS is looking to urgently review how the offshore energy sector complete final connections to the National Grid, with changes to policy anticipated in the near future, addressing the damaging environmental and social impacts identified by multiple Stakeholders and Interested Parties

Having first-hand knowledge from scoping and estimating a multi-million pound decommissioning project, and the issues related to developing a multi-stage programme or work, executing 'what-if' scenarios are an integral part of the assessment process. From these optioneering studies, contingencies are developed and costs estimated to cover these options. As any good military commander knows, plans fail on contact with the enemy and engineering projects are no different in this regard. To take an entrenched view that there can, or will be no deviation from the plans developed and submitted for examination by this Planning Inspectorate panel is frankly a very poor argument and dismissive of the examining process.

The applicant states they are in supply chain discussions and difficulties will ensue if changes occur at this stage of the proceedings. Until contracts are signed by the involved parties there are little or no financial commitments or constraints by either side other than time and expertise; parties work together to inform and review each other's needs and develop an understanding of services required and offered. This is the risk parties take when they receive an RTT, Request to Tender. In complex cases, remuneration for services to develop bids may be offered.

Some procurement items may have extremely long delivery lead times and a commitment up front several years in advance may be required, even before the project has permission to proceed. Again, this is a natural project risk. Like any major project, there is a risk that permission to proceed may not be given, or the goalposts are moved and a restructuring of work packages may follow. It appears in this instance the applicant chooses to reduce their risk exposure by avoiding any alternative solutions irrespective of the damage and disruption the proposals for EA1N and EA2 onshore infrastructure will cause.

We fully support the proposal first suggested at Open Floor Hearing 5 Friday 6th November 2020 by Paul Chandler and later proposed by Suffolk Energy Action Solutions and others at a number of later Issue Specific Hearings, and again by the Rt. Honourable Therése Coffey MP for Suffolk Coastal (ISH9) that each DCO application for EA1N and EA2, be considered in 2 separate parts, namely the offshore and the onshore elements, and judged on their respective merits with due regard to environmental effects and cumulative impact.

Save Our Sandlings are additionally mindful that whilst as an organisation we have not objected in principal to the offshore elements of these proposals, we fully respect and acknowledge the position statutory bodies including Natural England and Suffolk Coast and Heaths Area of Outstanding Natural Beauty have taken, raising objections to the visual impact these projects will bring to bear on the coastal areas of Suffolk and how they may, if consented, prejudice the statutory purposes of the AONB. Save Our Sandlings would like to make clear we fully support this position.

³ [Energy White Paper \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

⁴ [High Court Judgment \(judiciary.uk\)](https://www.judiciary.uk)

