



SAVE OUR SANDLINGS

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

Deadline 9 Response

from

Save Our Sandlings

REP-017 Outline Code of Construction Practice

Version 05

We make the following comments regarding the Outline Construction Code of Practice.

Chapter 2

Section 2.6 Local Community Liaison

Local Liaison Officer. Where will the officer be based? They need to be site based and contactable on each and every working day. Operating from a remote location cannot offer acceptable and timely solutions to community concerns.

Providing information directly to Town and Parish Councils and via information boards should be only part of the communication strategy. We suggest a closed Facebook group or similar that accepted representatives may join to view regular project updates, to comment and post questions and raise issues. This will be in addition to direct contact details. This should be supported by regular update meetings either face to face or via video call with an agreed business and resident liaison committee.

We are experiencing issues with the pre-construction survey contractors as we write. Contractors have been working along the onshore cable route for 2 weeks and a number of issues have been raised. Contact details of the site manager have been requested and as yet these have not been provided. All communications are via the applicants Community Liaison Officer based remotely in Norfolk some 40 – 50 miles from site. We consider this unacceptable as delays in responding to issues and concerns are being experienced. This is a foretaste of what is to come and we do not consider this a satisfactory state of affairs.

Whilst many residents are unhappy with any industrial development of land within and adjacent to an Area of Outstanding Natural Beauty containing Sites of Special Scientific Interest, Environmentally Sensitive Areas, Environmentally Protected Areas, Special Protected Areas and an area noted for its remoteness and serenity, they will not actively prevent legally consented works taking place as long as they know what is being proposed and likely timescales. What causes aggravation and leads to increased tension and anxiety is a lack of meaningful information and well-timed consultation.

Where works are to take place, more precise information as to the potential disruption to their everyday lives is essential. Recently, the unloading of a large excavator disrupted residents and businesses for some time leading to a missed doctor's appointment and a waste tanker from leaving the local caravan site and subsequently being late for their next appointment. A little forward planning in this instance, informing local residents and businesses of the potential disruption to the start of their day would have allowed alternative plans to be implemented thereby avoiding unnecessary delays.

Following an email complaint we received this response:

"On discussion with our Contractor the low loader had stopped for a short period (30 min – inserted) to unload the excavator as track conditions were deemed to be unsuitable for the excavator to continue along Sizewell Hall Road to its intended destination. We accept that some disruption was caused during these activities for this short time. Please pass on our apologies to those involved for any inconvenience.

The offloading of machinery is a periodic operation, these activities will take place at the start and completion of the ground investigation works to deploy and remove the machinery.”

The above response is incorrect as the excavator was unloaded at the Sizewell Hall – Beach View junction as the track was unsuitable for the **low loader**; the excavator then travelled the half mile along the part metalled and part unmade track to the point of work. Some damage resulted to the road surface during this operation. The previous day, an excavator was unloaded in Sizewell Gap Road, potentially a far more hazardous situation and then travelled to the same point of work along Sizewell Hall Road. We have to ask the question why the unsuitability of the track for a low-loader was not recognised on the first day and local businesses and residents not given advance warning of potential delay and disruption as a result of the alternative unloading point. This shows a complete disregard for anyone other than the contractor own self interest.

We are quite prepared to accommodate contractor’s requests as long as acceptable periods of notice are given.

Our most serious concern resulting from the complete blocking of Sizewell Hall Road is this is the main emergency escape route for residents and visitors to Beach View Holiday Park, Sizewell Hall, The Dower House and Wardens in the event a site nuclear emergency is declared by EdF at Sizewell B. Blocking or restricting access and egress on this road must **never** occur at any time and must always allow free passage. This issue was reported to the control room staff at Sizewell B as incidents of this nature need to be logged in order appropriate action can to be taken in the event a site emergency is declared and immediate area evacuation is deemed necessary. This is a most serious breach of safety protocols and caused increased anxiety and stress for residents.

SPR acknowledged further in their reply to our email:

“We are aware that this route is a primary evacuation route, as is our Contractor. This delay was unexpected and we do not intend for this issue to arise again.”

We would disagree with unexpected and say it was avoidable. Parties acting for SPR need to be very cognisant of the importance of this route; even in exceptional or ‘unexpected’ circumstances, was it correct restricting right of way on this road? Again an example of blatant disregard for the safety and wellbeing of others, putting themselves first. I remind the applicant of the 6 P;s:

Proper Prior Planning Prevents Poor Performance.

Sadly the first 3 P’s appear to have not turned up for work on this occasion.

All contractors must be aware of the issues of working in areas surrounding a nuclear power plant. Safety is everyone’s responsibility. While nuclear safety in the UK has the highest priority and is world class, events may occur at any time of the day or night and we must be ever vigilant.

Another Acronym contractors may find useful: **STAR - Stop Think Act Review**

N.B Sizewell B will be starting a 5 week refuelling outage 16 April 2021 with 1500 additional contractors performing several thousand individual and inter-related tasks. Outages present the highest risk of an incident occurring as plant is maintained and serviced.

Chapter 3

Section 3.1 Working Hours and Timing of Works

We are pleased to note though the working day is 7 am to 7 pm Monday to Friday and 7 am to 1pm Saturday, actual core hours will be limited to 8 am to 6 pm and 8 am to 1 pm respectively allowing an hour at the beginning and end of each day for start-up and close-down. We note also Saturday core working time does not allow a 1 hour for period close-down. We believe Saturday core working hours should read 8 am to 12 pm.

We note the relevant planning authority will be required to approve any work outside of construction work hours with the exception of *'activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property'*¹ Where emergency work is required notification to the relevant planning authority should be within 5 days. We believe this can be open to abuse by the applicant claiming work is an emergency and not subject to prior approval or consultation with affected parties. It is impossible for the planning authority to withhold approval if the work is already completed and community objections cannot carry any weight.

We would like an undertaking from the applicant that no work likely classified as essential to be start if there is any possibility this work will not complete during core working hours. In the event there is a prospect that required essential works are likely to overrun, we expect and demand prior consultation with the affected community and businesses well in advance of these events to avoid unwarranted disruption to the peace and solitude of the area.

Chapter 8 Soil Management

para 95 A pre-construction land survey would be undertaken by a qualified Agricultural Liaison Officer (ALO). Refer to comments above (Local Community Liaison). Experiences to date show poor liaison with the local community. Whilst the local community do not expect to be privy to the minutiae of day to day activities, it is imperative that works likely to affect everyday activities of the community are communicated efficiently and effectively providing sufficient notice for parties to make alternative arrangements if required. We have suggested methods of achieving these in our response Section 2.6 Local Community Liaison above

It is important to remember the Sandlings area in particular, is within an AONB, containing SSSI, ESA, EPA and SPA , and these works will take place in an area much loved and fiercely protected from activities likely to degrade the current environmental status. Businesses, residents and visitors rely on the whole area for income, leisure, peace and tranquillity. This especially true in the areas surrounding Wardens adjacent to Work area 9 (Plot 13). We note a very late alteration to order limits for Plot 13 announced 1 day before Deadline 9.

¹ 3.1 Draft DCO Schedule 1 Part 3 p23 Construction hours for the transmission works

Chapter 10 Air Quality Management

Section 10.1.2 Dust Management

The Sandlings area comprises very fine sand particulate and is extremely prone to wind-whipping and becoming airborne with the passage of traffic. Limiting the speed of traffic to 10 mph '*on unsurfaced, haul roads and work areas will be signposted and imposed*' will be insufficient to prevent sand particles forming dust clouds behind vehicles and will be an issue especially on PRow used daily by the local community and visitors.

It has been noted the current pre-construction survey personnel do not always observe these limits.

Appendix 3 Community Engagement Activity

We note the aims and objectives of this section and agree that these are essential to ensure the concerns and anxieties of the local community are adequately and fully resolved and respected. Our experiences to date with pre-construction surveys have not been encouraging in this regard.

The local community have a wealth of knowledge about the flora and fauna, their habits, migratory patterns and transit paths through the area from personal observations over very many years. Through consultation they can help inform decision making and help avoid unnecessary habitat intrusions or ecological disturbance in areas that desk-top surveys or intermittent field surveys fail to fully reveal.