



SAVE OUR SANDLINGS

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

response from
Save Our Sandlings

Issue Specific Hearing 6
Friday 29th January 2021

draft Development Consent Orders

Responses to Issue Specific Hearing 6 held 29th January 2021 via Microsoft Teams

General comments.

We echo comments by the speaker for Aldeburgh Town Council questioning how the applicant can be in discussions with EdF Energy re: cumulative impacts yet is not communications with other energy providers about projects also registered with the Planning Inspectorate and that have not yet started their examination process. We find this astonishing bearing in mind these projects are likely to commence during the construction phases of these 2 projects. (see our response below to Agenda Item 4)

Agenda item 2 - Changes to the Draft in Progress

The applicant has stated the commencement date to be brought forward to 2024, a reduction of 2 years. This announcement is viewed by many with great suspicion as a cynical attempt to avoid the option of collaborating as pathfinder in the BEIS Offshore Transmission Network Review¹ initial findings and Energy White Paper² December 2020. We also note the ISH2 response from Ofgem³. We are disappointed an opportunity to become a pathfinder is not being adopted thereby restricting and avoiding the onshore environmental, social and cultural impact of these projects.

Agenda item 3 - Provision for Projects Definitions and Elements

Schedule 1 Part 1 Authorised Development

*Work No. 12 — up to six electrical cables, up to two fibre optic cables and up to two distributed temperature sensing cables and cable ducts laid underground from Work No. 11 to Work No. 13 **including construction of a haul road and access***

We note the statement in bold infers a haul road and access will be included across works area 12 yet reference to a trenchless technique is referred to in the Scheduled of Changes to DCO document⁴. We wish clarification what a trenchless technique actually involves and that no disturbance of the ground surface structure takes place as the above statement does not make this clear.

Schedule 1 Part 3 Requirements

Article 12 - Detailed design parameters onshore

(14) The working width of the onshore cable route must not exceed 32 metres, save in respect of the following —

(a) where the cables cross the Sandlings SPA the working width of the onshore cable route must not exceed —

- (i) 16.1 metres, in the event that open cut trenching is used;*
- (ii) 90 metres, in the event that a trenchless technique is used*

As above trenchless method is the preferred option

(d) where the cables cross an important hedgerow specified in Part 2 of Schedule 11 (important hedgerows that will be crossed using a reduced working width) the working width of the onshore cable route must not exceed 16.1 metres;

We ask that Hedgerow 1 on sheet 1 of 12 of the important hedgerow and tree preservation order plan⁵ is removed from Schedule 11 Part 1 'Removal of important hedgerows'. This is an ancient right of way known as a Holloway⁶; centuries old trackways worn down by the passage of time. An alternative route has been suggested avoiding the need to remove or damage this rich and diverse habitat. An unaccompanied site inspection 27th January 2021 by the examining panel has been completed in this regard. It is important to preserve this unique feature in its entirety for the benefit of wildlife and visitors to the area.

(15) Jointing bays must not be installed within 55 metres of a building used as a dwelling-house.

We consider a value of 100 metres more acceptable in work areas 7, 8, 9, 11, 12, 13, 16 and 17 to minimise disturbance to properties adjacent to these work areas.

¹ [BEIS and Ofgem joint response to the Open Letter engagement](#)

² [Energy White Paper](#)

³ [EN010077-003537-DL4 - OFGEM - Deadline Submission.](#)

⁴ [EN010078-003251-3.1.1 EA2 Schedule of Changes to the Draft Development Consent Order](#)

⁵ [EN010078/EN010078-003248-2.10 EA2 Important Hedgerows and Tree Preservation Order Plan](#)

⁶ [Holloways: Roads Tunneled Into the Earth by Time - Atlas Obscura](#)

(16) Where open cut trenching is used to cross the Sandlings SPA, Work Nos. 11 and 13 must not include trenchless technique compounds.

We object to open cut trenching in this work area as this is a wildlife-friendly area that will have severe repercussions on the ecology of this area and will be detrimental to the overall appearance. We note that a HDD technique has been discounted in favour of other 'trenchless' techniques with respect to the impact of noise. Whilst HDD would result in potentially a higher level of sound, and the prospect of night working, we consider this an unfortunate sacrifice price to pay to maintain the integrity of this area.

Sympathetic management of this area by the RSPB to appear wild and overgrown benefits many types of bird and wildlife. Open cut trenching will destroy many decades of hard work and achievement and will take very many years to recover. At several public consultations it has been confirmed the cost of higher cabling techniques is not an issue. We would like to believe the applicants choice to open trench rather than trenchless, or HDD, is not being taken as the cheapest option in this regard.

Article 17 - Fencing and other means of enclosure

We ask that all fencing alongside PRow and especially Bridleways be securely installed and horse-friendly. Loose fencing materials and tapes can cause severe distress and alarm to horses and may lead to them bolting causing harm to riders, other PRow users and project workers.

Article 18 – Contaminated Land and Groundwater

We refer to a separate submission from Wardens and Richard Reeves in respect of the Suffolk Aquifer, an underground source of drinking water for several properties close to work area 9. Further survey work is required of the applicant to ensure no contamination or disruption to the Suffolk Aquifer can occur during the construction, operation and decommissioning of these projects.

During the Issue Specific Hearing and the discussion re: planted hedgerow maintenance period we alluded to the Suffolk Coast as a recognised drought area. This may seem at odds with the flooding issues at Friston and other parts of the County. The East Coast has a recognised lower rainfall than many other parts of the UK but this is not to say we do not have rain. It may be reasonable to assume that with the light sandy soil in the Sandlings area, any rain water would drain freely. In practice this is not the case. During the summer periods, the soil becomes very dry and due to the fine particles of sand is susceptible to wind blow erosion. And planting done in the Sandlings area takes many years to properly establish, as can be witnessed by some of the stunted and poor definition of existing trees and hedges. Also, any planting carried out in open areas needs to be protected from attack by resident red deer and especially muntjack. New shoots are a particular delicacy, and many newly planted species are prone to attack of this kind. For this reason we would like to see a longer term management program of at least 10 years to ensure new growth can occur without interference from the wildlife, and sufficient water and nutrients are given to encourage plants to become fully established.

With regard to flooding, following prolonged periods of heavy rain during autumn to spring, the tracks and pathways become flooded as do many roads. These flooded areas remain under water for extended periods as the relatively high water table and subsoils slowly absorb the surface water.

Agenda Item - 4 The Changing Policy Environment

New documented information we believe is important and relevant to this examination for consideration by the Examining panel.

1) National Grid ESO Network Options Assessment 2021⁷

NGESO confirm the following

- SCD1 - New offshore HVDC link between Suffolk and Kent option 1 – see pages 43, 140 and 141
- AENC - A new 400kV double circuit in north East Anglia - 2 new pylons
- ATNC - A new 400kV double circuit in south East Anglia – 2 new pylons

⁷ [NOA 2021](#)

SCD1 is referred to as critical and to proceed but SDC2 is on stop (page 110) No location where will SCD1 will connect, they cleverly avoid naming locations stating ‘Suffolk’. The pylons are north and south of Bramford substation.

Interestingly, they have inserted a disclaimer:

“All option routes and locations are for illustrative purposes only and are not intended to be an accurate representation of the planned route, locations and/or development of the National Electricity Transmission System, which are yet to be finalised. More details are included in the Disclaimer at the end of the publication.”

Unable to find a disclaimer on their previous NOA.

- 2) Article in East Anglian Daily times re: NGESO NOA⁸

News article in the EADT re: NG ESO NOA with comment from Richard Rout, cabinet member for environment and public protection and Matthew Hicks, leader of Suffolk County Council

- 3) ScottishPower Renewables East Angle newsletter⁹

Page 3 details the companies in the local supply chain. This data relates to East Anglia One windfarm but it is indicative of the fact that should EA1N and EA2 proceed it is very unlikely that the area in the Sizewell – Aldeburgh – Friston triangle will see any benefit as the contracts go the major population centres. It is worth remembering East Suffolk

Also interesting to note an article page 5 “Looking after our countryside and our climate” a statement very difficult to reconcile considering the damage these projects will cause. No amount of tree planting mitigates for this ecocide. These are not a green projects; the dis-benefits to not outweigh the benefits.

- 4) The Dasgupta Review^{10 11}– The Economics of Biodiversity

A February 2021 report of a study led by Sir Partha Dasgupta, FRS, FBA with a forward by Sir David Attenborough. The report focuses on the disconnect between the world’s financial systems and nature. We consider the finding in this report particularly relevant to these applications.

- 5) Suffolk Observatory¹²

The Suffolk Observatory is a web portal containing all Suffolk’s vital statistics.

From these pages we have drawn comparative population data for the 3 main council wards, Aldeburgh, Leiston and Saxmundham and draw your attention to the resident population aged 65+ as follows:

As can be seen from the above table 34% of residents are over 65 in the Aldeburgh, Leiston and Saxmundham wards which include Friston, Knodishall, Aldringham, Thorpeness and Snape, all villages directly affected by these projects. This is significantly higher than the average for the whole county of Suffolk as this area is very popular as a retirement area.

Ward	Total Population				
	All	65+	%	Suffolk	%
Aldeburgh	5,025	2,089	41		
Leiston	6,409	1,706	26		
Saxmundham	6,304	1,634	26		
Totals	17,738	6,111	34	1,238,506	20

- 6) The following projects are known and registered with the Planning Inspectorate
 - a) Sizewell C Nuclear Power Station¹³ (2023)
 - b) National Grid Ventures Nautilus Interconnector¹⁴ (2023)
 - c) North Falls Offshore Windfarm¹⁵ (2024)

⁸ [Concern as new electricity pylons proposed for Suffolk \(EADT\)](#)

⁹ [The East Angle Winter 2020 digital](#)

¹⁰ [The Economics of Biodiversity: The Dasgupta Review Full Report – 606 pages](#)

¹¹ [The Economics of Biodiversity The Dasgupta Review: Headline Messages - 10 pages](#)

¹² [Suffolk Observatory – Population](#)

¹³ [The Sizewell C Project | National Infrastructure Planning](#)

¹⁴ [Nautilus Interconnector | National Infrastructure Planning](#)

¹⁵ [North Falls Offshore Wind Farm | National Infrastructure Planning](#)

- 7) The following projects are under development and potentially registered within the construction lifetime of EA1N and EA2 projects.
 - a) National Grid Ventures Eurolink¹⁶ Interconnector (referred to but no further info. given)
 - b) The Five Estuaries Offshore Windfarm¹⁷ (2025)
 - c) NGESO SCD1 Interconnector (refer to NOA 2021⁷ pg 43, 47-50. 110, 122-123, 140) (2029)
 - d) NGESO SCD2 Interconnector (refer to NOA 2021⁷ pg 110, 122-123, 141)

Summary

We submit the above information in attempt to show to the Examining Panel the reasons why these projects should not proceed with regard to the onshore works. As has been evidenced by the many registered interested parties there is great support for the principle of green and renewable low-carbon energy but we do not believe in this instance the great environmental, social and financial cost to the local economy is outweighed by the benefit of offshore wind powered energy production. We recommend the Examining Panel look at these projects as separate offshore and onshore components. Whilst the wind turbine and associated offshore structures are not without some dis-benefits we would not object to the panels final decision to recommend to the Secretary of State BEIS approval of the offshore structures and associated components. Further, we would recommend the examining panel also recommend to the Secretary of State BEIS that the onshore elements are **not** approved and that serious consideration is given to encompassing these projects into the findings of the offshore transmission network review taking into account the admission from National Grid the Sizewell to Bramford circuit will become overloaded with all the additional energy production, and will require a new interconnector from Suffolk to Kent to reinforce the grid system, (as identified in NGESO NOA 2019-20).

Key:

■ Two Degrees
 ■ Community Renewables
 ■ Consumer Evolution
 ■ Steady Progression

Option code	Option description	EISD	TD	CR	CE	SP	NOA 2018/19 recommendation	NOA 2019/20 recommendation	Reason
OPN2	A new 400kV double circuit between Osbaldwick and Popleton and relevant 275kV upgrades	2027	2028	2028	2027	2027	Not featured	Proceed	New reinforcement
RTRE	Reconductor remainder of Rayleigh to Tilbury circuit	2021	2021	2021	2021	2021	Proceed	Proceed	No change
SCD1	New offshore HVDC link between Suffolk and Kent Option 1	2028	2028	2028	2029	2034	Not featured	Proceed	New reinforcement
SCN1	New 400kV transmission route between south London and the south coast	2029	N/A	N/A	N/A	N/A	Proceed	Stop	This reinforcement has been superceded by new reinforcement SCD1

Extract from NOA 2019-20 page 5

It makes commercial sense to save the cost of establishing a cable connection from a ‘Suffolk’ substation to the coast and divert the cost to fund offshore connections for offshore wind generators ‘in flight’ and future projects. It is an ever present fear among many local residents and business owners that East Suffolk will be continually disrupted by energy company’s projects for the foreseeable future. The construction of a massive substation in the heart of the Friston community and cable trenches across the AONB area will act as a draw for many other projects and the establishment of an massive energy hub. The table on page 4 of this documents records the number of residents 65 and over in the area. It is the firm belief of many in the autumn of their years they will witness the never-ending destruction and despoliation of a precious natural environment for the rest of their lives. Please do not let this happen; recommend refusal of the all onshore elements of these projects.

¹⁶ [Interconnectors | National Grid Group](#)

¹⁷ [Five Estuaries Offshore Wind Farm | National Infrastructure Planning](#)