

To the Examining Authority.
Written Submission Deadline 8.

Reference: EA1N. IP: 20024031. / AFP 132
EA2. IP: 20024032. / AFP 0134.

These remarks apply both to East Anglia One North and East Anglia Two.

1. Comments on Outline Code of Construction Practice .(REP7-026).
2. Comments on Issue Specific Hearing 12 (Noise).
Figure 1. Email concerning purported baseline acoustic tests at 1 Ness House Cottage.
Figure 2. Aerial Photograph showing location of purported acoustic equipment at 1 Ness House Cottages.

1. Comments on the Outline Code of Construction Practice Rev 4 (REP7-026).

These comments are primarily in relation to the issues with potential impact on the aquifer, and to the impacts of noise at Landfall site and the cable corridor route adjoining it.

5.1.72 Control Measures.

The final bullet point states :

In the event that unexpected gross contamination is encountered (i.e. visible and olfactory evidence of hydrocarbons, spent oxide, tars or other unusual discolouration or odours, work... will cease on instruction by the site manager or delegate. The affected area will be contained and made as safe as reasonably practical pending assessment by a suitably qualified environmental specialist. Consultation with the relevant planning authority and the environment agency will be Undertaken and agreement reached on plans for further investigation and remediation prior to any remedial action.

This overview of proposed controls over work covering such an extensive aquifer is not precise. What is the remedial action?

6.1. Contaminated Land and Groundwater.

76. Bullet point 6 states that Hydrogeological risk assessments (will be undertaken) for any activity that could cause changes to aquifer flow or affect aquifer water quality *within 500 m of any ground water dependent habitats, that requires excavations below 1m within 250m of boreholes or springs, or within 250 m of a groundwater Abstraction.*

Again, How is this relevant given the extent of the aquifer?

At Deadline 7, (REP7-096), I identified additional boreholes on the cable corridor site not included in the Applicants' assessment, with a map and photographic evidence (REP 7-097) that are regularly

used by the local farmer. I believe there are at least 4 in very close proximity to [REDACTED]. Proposed drilling and cable corridor work is dense on that area. The Applicant sought to address our concerns on the effects of HDD at Landfall on the perched aquifer with its Hydrogeological Risk Assessment (REP 6-021). However, general concerns about the polluting effects on the groundwater and thereby the aquifer have not been addressed.

We know that when pigs were kept on the adjacent fields for a period of several consecutive years, the quality of the water in the aquifer deteriorated significantly and had to be treated until it returned to potable status. It's difficult to believe that the industrial effects of these two projects will have a lesser impact.

9.Noise.

9.1.97. The Applicant seeks to mitigate noise at sensitive receptors with noise barriers/ acoustic screens.

What are the dimensions and properties such screens and acoustic cushions? Their height is significant here and should be specified in the final CoCP .

9.1.99 addresses sensitivities of certain properties.

9.1.2 Onshore cable Route construction noise control

107.states that:

additional practicable measures to reduce noise at these locations will be further explored as appropriate. At this stage of the Examination, I would welcome more reasoned evidence of mitigation; this does not provide significant reassurance. I rarely understand the precise meaning of the word " appropriate " in the Applicants' documentation.

Appendix 2 Figure 1. Potential Sensitive Receptors and Areas Subject to Additional Construction Phase Controls. Map.

In my Deadline 1 WR, I drew the Examining Authority's attention to the inaccurate identification of a Noise Monitoring Survey Location directly westward of the garden gate of 1 Ness House Cottages, identified on the map referenced above as CCR1. This point was also raised by Richard Reeves at ISH 4 Day 2.

To quote from my Deadline 1 submission:

**" 6. Noise and vibration management. ExAQ 1.4.34 Baseline Measurements
Flaw/ inaccuracy in assessment studies.**

On 20 June 2018 I was notified via my landlord's agent of the Applicant's proposal to place 3 briefcase sized noise monitors and 1.5 metre poles in the hedge/ scrubby trackside areas for noise monitoring at some point for 7 days commencing at some point in the next 3 weeks. Please see attached email screenshot.

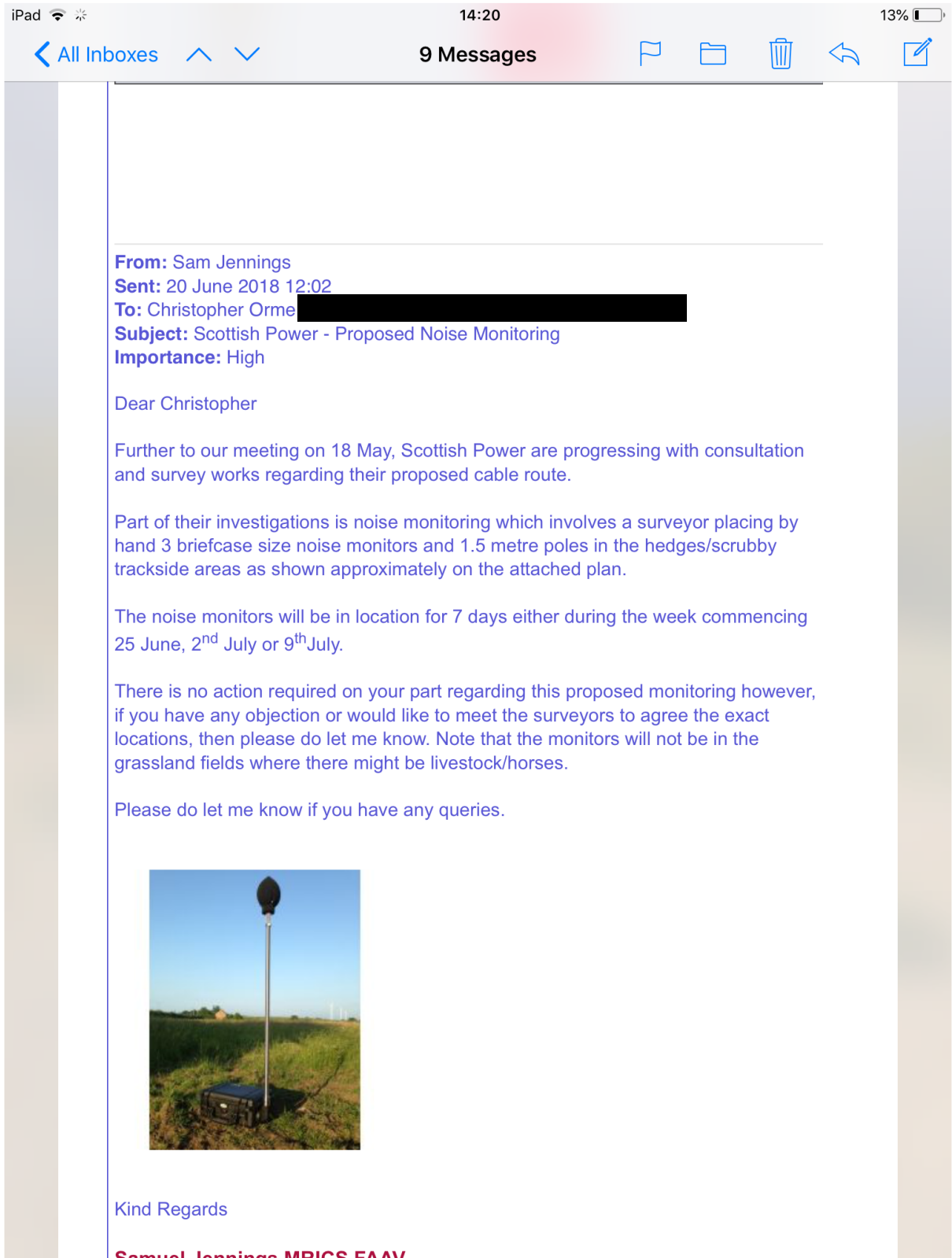


Fig 1.

An aerial photo was attached showing clearly that the monitors would be sited directly at the bottom of our garden, with a picture of the monitors in question. These are the monitors identified as CCR 1 in Appendix 2, Figure 1. In fact, as the Baseline Noise Monitoring Tables show (APP-524) they are identified with another property at a different location, Courtyard Cottage



Figure 2.

These monitors did not appear.

In the Applicants Environmental Statement APP-524 6.3.25.3 Table A25.3.4 Baseline Noise Monitoring Locations Onshore Cable Route Study Area, [REDACTED] and [REDACTED] are the only 2 properties cited as the location of noise receptors. [REDACTED] is identified as the address closest to CRR1 on that Table. The period of monitoring is identified as being on 3/ 7/2018 from 13.08.40 to 13.36.40) .

[REDACTED] are significantly further away from the construction site, and one of them is a holiday let and not permanently inhabited. This failure to provide correct information and identify different properties means that our households, at a distance of one modest sized field from the proposed Landfall and encircled by cable corridor works, set down etc, have been excluded from Baseline Noise Monitoring information provided to the ExA, except for a period of half an hour, and there are no studies pertaining to the impact upon them of the works, vehicle and personnel movement. Can the Applicant explain why? “

At ISH 4, Day 2, Session 2 Richard Reeves raised this point. Alistair Baxter for the Applicant replied

Just from memory that survey every location along the land for and along the cable corridor route was categorised as threshold which is the lowest so actually undertaking a survey at that property would not of made a material difference.

The point is that the Applicants documentation is claiming that they did make such a survey at this property.

Despite this point being raised on both these occasions, and the significance of Wardens Trust having become more visible in recent weeks, the Applicant has not amended or corrected the information in the important OCoCP. It's a detail but does show a relaxed approach to the accuracy of the documentation which they are placing before the ExA and on public record.

I'd like to underline here that in making their earlier site selection and Landfall Cable Corridor routing decisions, the Applicants appear not to have been aware of Wardens Trust at all and have therefore not taken its particular characteristics into consideration on many counts, Noise being one of them. This suggests that the original decision making process, undertaken without complete knowledge, is flawed.

Surface water and drainage management plan 10.1.8.

Please see remarks for 11.1.2 and 11.1.4 below.

11.1.2 Pollution Prevention.

136. States:

Cable installation activities will be designed to ensure that they will not affect groundwater in any significant manner. (my emphasis) and goes on to outline an alarming series of potential hazards that may well occur, the mitigation for which is retroactive and potentially inadequate in respect of potential effects on the Aquifer.

11.1.4 Surface Water Drainage.

147. *Land drainage systems would be maintained during construction, where possible, and reinstated on completion.*

The Panel has seen the puddles/ flooded access paths near Plot 8, preventing passage. "Possible " maintenance of drainage isn't adequate as a provision. Even with current drainage, there is a degree of this flooding throughout the year, with the exception of the hottest months.

15.Contingency Planning.

Please see remarks above on 11.1.2 and 11.1.4.

2. Issue Specific Hearing 12. Noise. .

Session 3. Landfall.

The question was posed, In consideration of the worst case scenario of of HDD 24 hours a day during certain periods and whether that has been appropriately assessed,

Whilst the cable corridors component of the outline code 9.1.2 does identify certain specific human receptors. So the wardens trust playing field and dwellings within 75 m turning to the land for section 9.1.1 there is no specific reference of any particular receptor that might require any particular measure despite the fact that there are dwellings reasonably nearby and activities by the wardens trust also relatively nearby. So is the silence of the outline code on the identification of specific individual receptors and measures appropriate or is any additional wording required there.

I note that the Council's position was that this factor will be picked up by Section 61 application, and we would expect those to be reviewed in relation to specific receptors.

I'm very concerned as to why these considerations in relation to specific receptors have been addressed in respect of cable corridor work but not in respect of the enormous potential noise pollution implications of HDD at Landfall, given that the " temporary " nature of the works could extend over significant periods of time and occur for each project, and the presence of persons with protected characteristics at Wardens.

I'd be far happier to see this addressed in any final CoCP. Again I'd question why the Applicant has not taken these factors into consideration, especially when it is known that there are persons with protected characteristics at the site.

I'd also like to make the point again that there are horses located in close proximity to the site of HDD drilling, who will be immensely disturbed by the noise and vibration as it will mask one of their most effective resources for self- defence, their hearing. There is a clear risk of potential panic and injury, to themselves or those handling them, and the distress which will be caused to their owners by any impact on their health and well- being. I have no confidence that such considerations as these, which have not been addressed by the Applicant throughout the Examination, will be adequately provided for at any later drafting post – examination, particularly in the light of the inaccurate and flawed information provided by the Applicant in relation to their acoustic tests as outlined above.

I'd ask that consideration be given to the presence of livestock in respect of acoustic mitigation and animal safe fencing as to Provision 3.3.52 of the OCoCP.

Finally, IAQM Guidance (IAQM 2014) states that

Detailed assessment is required where there are human receptors within 350 m of site boundary and/ or within 50 m of the routes used by construction vehicles on the public highway, up to 500 m from the site entrance.

This required assessment does not seem to appear within these applications. Late in the day, concessions may be being made on areas of concern which should have been central to the Applicants site selection from the beginning.

For further remarks on this latter point, please see my Deadline 8 submission in response to Action Point 10 arising from CAH 3.

Tessa Wojtczak.