



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

SEAS General Report on the DCO Examination Deadline 8 – 25 March 2021

by

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

Unique Ref. No. EA2: 2002 4496



info@suffolkenergyactionsolutions.co.uk

<https://www.suffolkenergyactionsolutions.co.uk/>

SEAS General Report on the DCO Examination Deadline 8 – 25 March 2021

End of Examination Report – whither the DCO?

It feels a little like the end of term. We have engaged in an Examination, produced the equivalent of exam essays and had to speak up at Hearings to show our evidence. This is the equivalent of that end of term report. We now have the chance to stand back from the relentless process and view the exercise from a distance.

Having attended the Draft DCO Hearings throughout the Examinations, SEAS offers the following observations:

1. National Grid is the elusive designer of a master plan

1.1. It is our belief that this DCO Application is not structured correctly. Given our collective knowledge about the true scale of the energy Hub envisaged, it is clear that National Grid is the architect behind the plans for a cluster of substations and inter-connectors and therefore should have at the outset put forward a master plan showing the full scale of what is intended for Friston and the surrounding area, with a separate DCO Application for the National Grid substation prior to any Developer such as ScottishPower coming forward with its own DCO Application. These substations are “associated” but the strategic framework has been designed by National Grid, not by ScottishPower. The Trojan Horse is ScottishPower, but the Leader is actually National Grid.

1.2. National Grid played “Pass the Parcel” (verbatim by Suffolk County Council QC) and Russian Dolls with Interested Parties (IPs). Their DCO was hidden in the SPR DCO. National Grid was never there to answer essential questions relating to the grand scheme, the master plans, when they were invited to attend, yet National Grid went overboard and fielded one of the UK’s leading infrastructure planning QCs, [REDACTED], who spent a disproportionate amount of time articulating the detailed plans at more than one CA Hearing, relating to an Affected Person’s (AP’s) field, which they wish to use on a temporary basis. National Grid’s silence for the majority of Hearings was deafening.

2. Inadequate surveys

2.1. The surveys which have been carried out by the Applicant to assess the range of impacts have been wholly inadequate. The ExA is being asked to judge the safety of the plans. SEAS believes that there is insufficient knowledge and evidence due to these incomplete surveys.

3. Innumerable outstanding issues

3.1. Adverse impacts relating to environment, communities and economy are not fully understood. These issues are some of the outstanding questions:

- 3.1.1. The likely level of risk to health and well-being relating to intolerable noise at Friston
- 3.1.2. The threat to Thorpeness landfall cliff erosion and risk to coralline crag
- 3.1.3. Aquifer contamination
- 3.1.4. Habitat severance along the cable route; the threat to AONB and SSSI
- 3.1.5. PRow and hedgerow desecration
- 3.1.6. The quantification of the existential threat to the village of Friston
- 3.1.7. The quantification of the existential threat to Wardens Trust, the Charity for the physically and mentally disabled
- 3.1.8. The threat to traffic increases and risk of more accidents on the A12, A1094 and rural lanes; increased dangers to cyclists, drivers and delays for Emergency services
- 3.1.9. The threat to the dynamic tourism sector and to jobs
- 3.1.10. The threat of air pollution to health

4. The site selection was flawed

4.1. The site selection was made by National Grid. It was forced to consider Broom Covert as well as its original choice of Friston. But after consultation it rejected Broom Covert giving the reasons that building there would go against national planning laws and for other considerations. This assessment method failed to unearth the reasons why the Friston site selected was so clearly also inappropriate.

The only advantages of this site were that it was the largest candidate area, only 9 Kms from the sea and not seemingly expensive to compulsorily purchase. The surveys that were conducted were a post-rationalisation for Friston. If the surveys had been properly carried out by independent, objective surveyors Friston would never have passed the test.

5. **DCO assessment is flawed because surveyors are not independent**

5.1. The DCO assessment method is flawed. Independent surveys should be used at all times. The legal and medical sectors have step changed to using objective assessors some years ago. The infrastructure planning sector is behind the times and is still reliant on surveys carried out by the Applicants' chosen surveyors, who are not objective because they were chosen by the Applicant. This is a nonsense. The so-called independent surveys are suspect and many of them have still not been presented for interrogation. The recent scoping survey for the Hundred River "wet" woodland has not been shared with the ExA and IPs. It is not a comprehensive survey.

6. **Surveys are conducted at the wrong time of year**

6.1. Many of these surveys were carried out retrospectively and some of the ecology surveys were carried out at the wrong time of year (see Deadline 8 Submission by SEAS relating to Biodiversity).

7. **Superficial mapping**

7.1. The fact that the Wardens Trust was only identified as an issue when [REDACTED] presented his concerns on behalf of the Trustees at a Hearing in January 2021, is revealing. It shows us how superficial the studies were and how little information was gathered in relation to the adverse impacts for the local communities. Not to have been aware of the existence of the Wardens Trust is astonishing.

7.2. The aquifers running below ground at Ness House were not identified as an issue at the outset. These aquifers are a laced network running along these cliffs and

shoreline. They risk being contaminated or destroyed by the drilling works for the cable corridor.

8. Thorpeness cliffs landfall is unsafe (source: [REDACTED], Chairman – Alde & Ore Association):

8.1. In the absence of any surveys in the field, the plans for which are only in the future, and despite the statement that the cliffs are fragile, there appears to be limited understanding that the Thorpeness Cliffs are, at best, a hardened sand dune in consistency. The cliffs are essentially formed from the geological strata called the Norfolk Crag Formation: this is not a hard rock that will withstand drilling, it consists of sand and some gravels and, as is very evident from the cliff face on the shoreline, it is highly susceptible to collapse caused by thundering waves. The Applicant's document 'Landfall Hydrogeological Risk Assessment', REP6-021, mentions in paragraph 44 that if the layers forming the cliff land are of reasonably medium or dense consistency HDD would work but, if they were loose granular sediments, they may not form a stable bore. Observation of the cliff face in the southern part of the landfall area shows a very loosely formed stratum.

8.2. The Applicant's 'Outline Landfall Construction Methods Statement', REP6-022, is helpful in explaining the HDD process and the monitoring plan and adjustments that can be made but is silent on what can be done if a stable bore proves not possible. There are to be 2 to 4 bores for cables for each EA project which increases the extent of even minimal vibration, were that achievable, and it would occur throughout the entire length from entry from the sea upwards to the land fall HDD entry pit through the sandy ground. Direct drilling will be necessary over 24-hour periods and a period of days. The impact may be more if other companies' projects come in this way too.

8.3. There appears to be no plan should the surveys, which will be done later this year, show the Crag formation forming the whole cliff area back to the 85-metre emerging point is not of the necessary medium density. While Doc REP6-022 explains the type of HDD to be used will be rotary not percussive and so vibration will be minimal and describes the plan to halt drilling and adjust the process to work more gently, it

is not clear how, if they are found, loosely granular sediments can be dealt with so that the friable cliff will not be caused to disintegrate more rapidly.

8.4. Further, the cables coming on shore will start below sea level and involve going through the Coralline Crag. This rock is only partly indurated and very friable, witness the many small thin chunks of it thrown up on the beach after storms. While it is recognized that the Applicant plans to seek to minimise the impact on the Coralline Crag, if that proves not possible any changes to the Coralline Crag would potentially affect the coastal flows which the current Crag bank dominates.

9. IPs were limited in their chance to contest

9.1. Unlike a Court hearing, there is no cross-examination. The ExA can ask questions, particularly towards the end of the Examination, relating to the more technical aspects, but there is no chance of any in-depth probing by the IPs. This means that at every Hearing, there was a sense of frustration that a particular issue for the IPs had been skirted over and rarely with any real scrutiny or opportunity for a further question.

9.2. At times, there were feelings that IPs were not given enough time to make their points. IPs felt pressured to rush through their evidence.

10. SPR is belatedly presenting a mini-CIA on Nautilus

10.1. The fact that on 24 March 2021, six months after the beginning of the Hearings, there is still no official recognition of the impact caused by multiple projects, including Nautilus, makes a disturbing and discordant note in the overview. SPR presents itself as a disingenuous player, gaming the system at will. SPR decided at the last hour to present its surveys relating to Nautilus at Deadline 8 on 25 March 2021. We await this report but we are not holding our breath. We doubt that it will explore the true impacts on the environment, economy and communities. However, thanks to the Easter holidays, there are likely to be no more than three (3) or four (4) working days before the final Deadline 9 on 6 April 2021.

Not enough time or opportunity to contest the cumulative impact with any depth of analysis (see Deadline 8 Submission by SEAS relating to “Cumulative Impact”).

11. SPR has used compulsory purchase statutory powers to gag landowners

11.1. Opposing voices have been silenced. The NDA Clauses in the suite of agreements have understandably created a climate of fear amongst the majority of APs. We know this for a fact having approached landowners who are APs. They have made it clear that they would like to engage but that they feel silenced. Dr Gimson was uniquely prepared to stick his neck above the parapet and openly challenge SPR’s behaviour and method of dealing with APs. SEAS has only recently discovered how evidence has been suppressed. This is procedurally unfair and undermines the whole Examination (see Deadline 8 Submission by SEAS relating to “Negotiations with Affected Persons”).

12. SPR is promoting outdated, irresponsible solutions

12.1. SPR has not appeared to notice the changing policy environment, except in the context of using the White Paper’s statement about 40GW objectives, for its own ends. In terms of the brave new world, SPR only defines that world within its own parameters of so-called energy efficiency and bottom line. It does not grasp the new environmental goals and as these projects will be constructed in the future, not in the past, SPR is falling behind the curve, promoting outdated and irresponsible solutions. SPR has shown zero interest in embracing new technology for these plans and yet is exploring new technology for other projects.

13. No real community engagement

13.1. An issue specific Hearing took place for Health including Mental Health. However, no serious consultations ever took place at a local level. At the Health Hearing, ██████████ spoke on behalf of the Applicant presenting a case of local community engagement. In fact, her work is more akin to PR with “roadshows” (*per* ██████████). For future projects there should be community liaison representatives (chosen by the community) overseeing the “consultations” held by developers in

order to ensure that the true concerns are “ventilated” at the earliest possible opportunity.

14. SPR’s tourism forecasts have been flawed from the outset

- 14.1. The interdependence between the road system and the tourism sector has never been fully recognised by the Applicant. Nor has the Applicant acknowledged that Aldeburgh is an iconic tourism destination, a magnet for Nature and Music lovers. Aldeburgh is less than three miles from Friston. It is clear to us, that the Applicant would like to think that Aldeburgh is 100 miles away. The A1094 is the main arterial road for tourists to Thorpeness and Aldeburgh and neighbouring villages.
- 14.2. The Applicant has tried to isolate the cable route and Friston artificially from its geographical context. It has failed to acknowledge the implications of the Estuaries and the principal arterial road to the coast. It is almost as if these valued tourists do not exist. They are a figment of our imagination.
- 14.3. No original quantitative targeted research was conducted by SPR. Simon Clearly has sought to undermine the DMO report suggesting that the methodology is flawed. Clearly suggests that the research moderators should not have asked the respondents questions relating to their own attitudes and expected behaviour, but should have asked respondents to imagine attitudes amongst others. In fact, from a market research perspective both approaches have validity. If we took the most optimistic outcomes from the DMO report, the loss to tourism business is still significant. If we take the £25m loss per annum forecast instead of the £40m loss per annum, given the cumulative impact of new additional projects not factored in by the DMO, such as Nautilus and other substation projects, we can estimate at minimum a loss of around £300m over a ten-year period.
- 14.4. Current mitigation proposals agreed between East Suffolk Council and the applicant are an insult to the hospitality service businesses such as the hotels in Aldeburgh, the B&Bs in Snape, the restaurants dotted across the region and the Festival operators. A £150,000 offer for marketing materials is the proposed mitigation. The vast discrepancy between the losses forecast and the paltry



mitigation leads us to the conclusion that East Suffolk Council is indifferent to the future outcomes and jobs for communities along the Suffolk Heritage Coast, holding scant regard for the real value of unspoilt nature and tranquillity to this particular region.

15. Whither this DCO?

To conclude, the DCO is in our terms, not fit for purpose. It is flawed and has been from the outset.

SEAS recommends a “split decision” as we have proposed in our [WR, reference REP5-114](#) at Deadline 6. We urge the ExA to refuse consent for the onshore infrastructure as proposed in these ill-conceived plans.

The Examination process has conventionally looked through a single prism based on current planning law; we now have a duty and obligation to future generations to look first through through the prism of emerging environmental policy and new value systems for a sustainable economy and planet.

Unless a renewable energy project is green from end-to-end, it fails any sensible green test. Harnessing wind energy through a substation at Friston means the whole process is tainted. Onshore delivery at a brownfield or pre-industrialised site is the only way to ensure that we are delivering the benefits of clean, green energy for our people, our precious habitats and our priceless planet.

Fiona Gilmore

25 March 2021