



SPR EA1N and EA2 PROJECTS

DEADLINE 9 – THE QUALITY OF STAKEHOLDER ENGAGEMENT

Interested Party: SASES **PINS Refs:** 20024106 & 20024110

Date: 15 April 2021 **Issue:** 2

INTRODUCTION

1. Throughout the Examinations SPR have promoted their view of their excellent communication with the local community, citing EA1 as an example. Last week's experience of the commencement of significant ground investigations shows that SPR's communication with the local community is poor. SPR have also commended their organisational skills. The recent submission of the "Lessons Learned" document from SCC (REP8-173) would suggest otherwise.
2. Residents across the area have been deeply concerned about what the future may hold if consent to the Projects was given and feel they have had a taste of what is to come. Multiple complaints have been made to the local authorities and other public bodies. SASES requests that the ExA take this further demonstration of SPR's of poor communication with local communities into account when considering the likely effectiveness of the proposed mitigation.
3. This is a matter of very great importance if the Projects are consented. The effectiveness of mitigation in many topics is dependent upon effective engagement for example:
 - a. the Outline Landscape And Ecological Management Strategy;
 - b. the Substations Design Principles Statement; and
 - c. the Outline Code of Construction Practice
4. Given SPR's persistent failure to adequately communicate with local communities and their inability to anticipate issues and areas of sensitivity, they need to refresh their approach to these matters and the team responsible for it. This is an area given the circumstances which requires the ability to listen, to appreciate the other parties' point of view, to anticipate issues of sensitivity and to proactively communicate, recognising that over communication is better than under communication. There is no recognition that SPR have caused and, if the Projects are consented, will continue to cause huge disruption to people's lives for a decade at least. Stakeholder engagement in a situation such as this requires high calibre individuals with excellent people and communication skills. This is lacking as the history of poor engagement demonstrates.
5. SASES wishes to bring to the attention of the Examining Authority actions taken by SPR very recently within the Onshore Development Area. SASES believes that these demonstrate SPR's continuing disregard for local communities and poor consultation record, which goes back to the Consultation Phase commencing in the Autumn of 2018. The ExA will be aware that Friston Parish Council/SASES commented on this in their Adequacy of the Consultation submission in October 2019.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-001604->

RECENT EVENTS

6. On 17th March 2021 SPR sent emails to those registered as Interested Parties advising that ground investigation works were planned to take place between March and August 2021. A copy of this email is attached at Appendix 1. There is a link in the email to SPR's website for further information:-

https://www.scottishpowerrenewables.com/pages/east_anglia_two_and_one_north_onshore_ground_investigation_works.aspx
7. No specific dates for any of these works were given. It should however be noted that the works included borehole drilling to 30M and excavation to 4.5M by 'JCB-type' vehicles. Working hours were proposed from 7am to 7pm on weekdays and 7am to 1pm on Saturdays, said to be in line with the DCO. There has been no recognition of the agreement to reduce construction hours.
8. SASES understands that SCC Public Rights of Way Manager was advised by SPR in December 2020 that they would be using public footpaths as accesses for these works and that SCC's consent was not required as SPR had the landowners' consent to use them. This is clearly of concern to those who regularly use the footpaths.
9. On Thursday 8th April 2021 (less than 2 days after the Examination was due to close) without any notice a vast amount of signage was erected across the Onshore Development Area. No consultation was undertaken with Suffolk County Council as Highway Authority as to the placing of these signs, nor was any notice given to Town and Parish Councils. There were some insignificant A4 printed sheets pinned to stakes at some locations, but these gave no precise information, even if one could stop to read them. Many of the recent road signs were erected on very narrow rural lanes and footpaths, posing a danger to motorists and pedestrians. One sign was hit on the first day. Some signage was placed in people's gardens and private land without any reference to the occupier - see photograph 5
10. Photographs 1 – 9 attached are examples of the signage erected, There is a further site entrance off the B1121 (Saxmundham Road) near Footpath 16, making a total of 6 site entrances in Friston, with multiple signs in both directions for each access. As can be seen much of this signage is very close, to or encroaching on, the carriageway and SASES believes that a 1m distance from the metalled surface is required, although it is not possible to fully demonstrate the sheer quantity of signs, nor the intimidating effect it had on the community
11. Subsequent to the erection of these signs a further email was sent by SPR on 9th April advising of nearshore works commencing on 12th April. A copy of that email is attached at Appendix 2. Again, no other notification or consultation has been undertaken and residents are understandably concerned about this very sensitive area.
12. Early on Saturday 10th April all signage in the Friston and Aldringham area was removed as mysteriously as it had appeared. Some signage remains in other locations.
13. SPR now seems to have rethought its plans and sent an email on 13 April concerning works commencing the following day on 14 April. However SPR do not seem to have considered the footpath and ecological considerations. Please see email exchange with SCC attached at Appendix 2.

14. Also SPR does not seem to be exercising proper control over its contractors. One resident on Tuesday, 13 April 2021 found a contractor conducting highway survey works using the resident's driveway access as a parking area and partially obstructing it.

Aldringham and Sizewell

15. Signage was also erected in these locations and a large excavator was unloaded at Sizewell Hall Road. This process took approximately 25 minutes and was without notice to residents, causing substantial delays and one person missing a doctor's appointment. This is also the emergency escape road for the nuclear power stations, which is of great concern. The tracks of the excavator also damaged the road surface, photos 10 – 13.

PHOTOGRAPHS

Photo 1 – entrance to Church Road, Friston from B1121 – dangerous position of signage within the carriageway.



Photo 2 – Entrance to Footpath 17 off Church Road, Friston



Photo 3 – Near St Mary's Church, Friston (note narrow road)



Photo 4 – Entrance to Church Lane from Grove Road



Photo 5 – Sign in private garden in Grove Road – no consent sought from owner



Photo 6 – Site entrance in Grove Road (1 of 4) on Footpath 6



Photo 7 – Site entrance from Grove Road (2 of 4) south of Grove Wood



Photo 8 – Site entrance from Grove Road (3 of 4) near Fareacre



Photo 9 – Site entrance from Grove Road (4 of 4) on track leading to Little Moor Farm



Photo 10 - Delivery of excavator at Sizewell Hall Road



Photo 11 – damage to road surface at Sizewell



Photos 12 and 13 – two site accesses off B1122 (Aldeburgh Road) in Aldringham





APPENDIX 1: Email sent by SPR on 17th March 2021

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East Anglia ONE North Offshore Windfarm

March 2021

Ground investigation works are planned to take place across the East Anglia TWO and ONE North onshore development area between March and August 2021.

These advance surveys are necessary to feed into the cable route and substation design and to gain a better understanding of the environmental mitigations required should the DCO application be successful, as well as to aid with the timely delivery of renewable energy to the area.

This process of early investigations is routine to support the design and suitable mitigation for the development should consent be granted. All works have been carefully planned to work closely with the ecological team and will only take place with their approval.

The investigations will take place at various locations along the proposed 9km cable corridor and at the substations site. No investigations will take place within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) or Sandlings Special Protection Area (SPA) during the bird nesting season.

SPR representatives are currently working across the site to mark out the proposed site boundary for the works to commence.

The work will include small teams of people investigating the ground at various locations across the proposed development area using different methods including, soil and groundwater sampling, heritage feature and topographic surveys. This is to assess the baseline condition of the ground to inform future possible design and construction phases.

Scottish Power Renewables recognises the critical importance of the local environment. In planning the ground investigation, the locations around the site have been chosen to minimise disturbance to the people, places and landscape within which the investigation will take place. No works are planned on Public Rights of Way and no diversions to them are planned.

Please visit the [ScottishPower Renewables website](#) for further details on these investigation works.

APPENDIX 2 : Email exchange between SPR, Suffolk County Council, SASES, Friston Parish Council Dated 13/14 April 2021

From:

Date: Wednesday, 14 April 2021 at 12:10

To: [REDACTED] <[\[REDACTED\]@scottishpower.com](mailto:[REDACTED]@scottishpower.com)>, [REDACTED] <[\[REDACTED\]@scottishpower.com](mailto:[REDACTED]@scottishpower.com)>, [REDACTED] <[\[REDACTED\]@suffolk.gov.uk](mailto:[REDACTED]@suffolk.gov.uk)>, [REDACTED] <[\[REDACTED\]@suffolk.gov.uk](mailto:[REDACTED]@suffolk.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@suffolk.gov.uk](mailto:[REDACTED]@suffolk.gov.uk)>, "fristonclerk@gmail.com" <fristonclerk@gmail.com>, [REDACTED] <[\[REDACTED\]@foreburyestates.co.uk](mailto:[REDACTED]@foreburyestates.co.uk)>

Subject: Re SPR- Onshore Investigation Works Update 13/04/21

Hello [REDACTED],

Your notification email has been passed to me. Please can you include me in your community emails so that I am kept informed when there are works that might affect public rights of way, rather than receiving updates via others.

A couple of comments:-

Access point 4 appears on or close to a public footpath (E-354/007/0) which is currently a narrow gap in the existing roadside hedge [REDACTED]. If you are proposing to take vehicles in here, then you will need to consider the implications of removing the hedge in the nesting season [REDACTED].

Access point 2 appears to be using the public footpath (E 354/008/0) although when I was on site yesterday, the TM signs were being placed further south relating to a new access that had been created from Grove Road immediately to the south of the property, Fareacres. This is a bit confusing to locals and other stakeholders alike.

Best Regards,

Area Rights of Way Manager

Rights of Way & Access

Suffolk County Council - Natural Environment Team

Halesworth Service Delivery Centre, Blyth Road, Halesworth, IP19 8EN

[REDACTED]

----- Forwarded message -----

From: [REDACTED] <[\[REDACTED\]@scottishpower.com](mailto:[REDACTED]@scottishpower.com)>

Date: Tue, Apr 13, 2021 at 6:27 PM

Subject: Onshore Investigation Works Update 13/04/21

To: Friston Clerk

<fristonclerk@gmail.com>, saveeastsuffolk@outlook.com <saveeastsuffolk@outlook.com>

Cc: [REDACTED] <[\[REDACTED\]@scottishpower.com](mailto:[REDACTED]@scottishpower.com)>

Hello

We provided a update in March notifying of onshore investigation works taking place at various locations within the proposed cable route (attached).

Activity is now underway and we are providing regular updates to parishes about key activity taking place in your community over the following couple of days, if relevant. This is so you are aware of the works and can pass information on as you see necessary. The investigation programme is constantly evolving due to the nature of the works and therefore we will provide this information as and when confirmed.

Please find below update:

Wednesday 14th April

Site investigation works are due to start on the proposed substation land.

Traffic calming measures will be put in place for all allocated access points for our vehicle movements including site access and traffic speed reductions signage where relevant as indicated on the map below, along with notices on PROW where vehicles will be using these for access, over the next couple of days.

A CPT truck (Cone Penetrometer Test rig based on a truck-chassis) will be collected from a works location in Sizewell at around 0930hrs to be transported and delivered to Friston Access Point 2 as indicated below. To safely deliver this vehicle into the site we are permitted to manually control the traffic for a maximum of 15 minutes.

Thursday 15th April

The CPT will be collected at the end of the shift on Thursday around 1630hrs.

If you have any questions about these works or movements please do not hesitate to get in touch.

██████████ | **Community Liaison Officer** | **East Anglia Hub**
████████████████████

APPENDIX 3: Email from SPR of 9th April 2021 advising of Offshore Works commencing on 12th April

East Anglia TWO Offshore Windfarm

April 2021

Nearshore investigation works are planned to take place in an area off the coast of Thorpeness from 12 April 2021.

These advance surveys are necessary to feed into the design of the cable landfall for the windfarms. By gaining a better understanding of the ground conditions below the area at this early stage, it will be possible to develop environmental mitigations at the landfall which would be required should the DCO application be successful, as well as to aid with the timely delivery of renewable energy to the area.

This process of early investigations is routine to support the design and suitable mitigation for the development should consent for each project be granted. All works have been carefully planned, working closely with the environment team.

Location and Timings

The investigation works will take place just off the coast of Thorpeness in front of the proposed East Anglia TWO and ONE North landfall location. All work is being undertaken with consideration of the relevant offshore stakeholders interests, such as the owners of the Concerto 1S telecommunications cable.

A Jack-Up vessel will be towed to the area from Lowestoft on Monday 12 April and installed throughout the day for works to commence. Works are expected to be completed by the end of May. Within that time the Jack-Up will move location of no more than 1-2km to target a maximum of 10 different areas as indicated in the below map, remaining in each location for about 3 days.



The works will be taking place 24 hours a day, 7 days a week. Fulfilled by two teams of a maximum of 8 people carrying out 12 hours shifts. These teams (which are each dedicated COVID ‘support bubbles’) will be transported to and from the vessel from Southwold by a crew boat twice a day.

In addition, there will be a support boat that might visit the vessel once a day to drop off supplies or pick up samples.

The Investigation Works

The investigation works are being carried out by our contractor Fugro and are to collect samples from the seabed and investigate the permeability, thermal conductivity and baseline geotechnical parameters. With the ambition of providing us detailed and up to date information about the area, the position of the Coraline Crag below the sea and to best design the final cable route.

The works will involve borehole drilling to collect samples and cone penetration testing to determine the strength of the ground depth.

Due to the nature of the 24/7 working in the marine environment, light from the vessel at night and some noise from the works at all times can be expected, though processes have been put in place to minimise this where possible.

Minimising the Impact

Scottish Power Renewables recognises the critical importance of the local environment. In planning the investigation, SPR have selected an extremely experienced contractor that shares their commitment to protecting the environment.

Ecological and environmental surveys, maps and plans have been consulted and reviewed to avoid any areas where there is any potential risk of ecological or archaeological disturbance.

As additional reassurance, SPR has representatives monitoring the works to ensure compliance with all applicable environmental standards.