

15 April 2021

Dear Sir,

Scottish Power Renewables  
EA1N AFP – 042, EA2 AFP – 042

I am writing on behalf of Mrs Elspeth Gimson, resident at [REDACTED], for whom I hold Power of Attorney.

We continue to object very strongly to the behaviour of Scottish Power Renewables (SPR) and their current windfarm cable route application.

Our grounds for objection include their previous described attempts to prevent us from objecting to their proposals, the failure to address concerns about the water supply at Ness House with a failure to supply an objective, impartial assessment of risk, the cumulative impacts of at least two cable corridors at this site and recent ground works on surrounding fields without any prior notification.

**1. Attempts to prevent objection to the application.**

We have previously described to the Examining Authority clauses which were included in contracts to be signed and the associated remuneration.

1.1. We were offered a contract to sign which included; *“The Grantor shall not make a representation regarding the EA1N DCO Application nor the EA2 DCO Application (and shall forthwith withdraw any representation made prior to the date of this Agreement and forthwith provide the Grantee with a copy of its withdrawal save as the Grantor shall have absolute discretion over the withdrawal of all comments pertaining to the impact of the Project(s) on ground source water aquifers only in document refs. REP1- with this contract we were offered a “gate opener242, REP2-098, REP5-135 and REP5-136) nor any other Permission associated with the EA1N Development or the EA2 Development and shall take reasonable steps (Provided That any assistance is kept confidential) to assist the Grantee to obtain all permissions and consents for the EA1N Works and the EA2 Works on the Option Area (the Grantee paying the reasonable and proper professional fees incurred by the Grantor in connection with the preparation and completion of such permissions and consents).”* With this contract we were offered remuneration which included a “gate opener” and an “incentive payment – for entering into the options agreement”.

1.2. If we had signed that agreement we would not have been able to make objections, would have had to withdraw previous objections and would have been required to assist SPR in all future applications in the Option Area. It is our opinion that this demonstrates that SPR is not a reasonable or responsible negotiating partner, which may be seeking to stifle all dissenting voices.

1.3. Can the Examining Authority be sure that others who may have signed such a non-disclosure clause, would not be objecting to this proposal if they had earlier not signed such a clause? Even if no contract have yet been signed, these contracts have been

circulated to others Affected Persons. Can the Examining Authority be sure that they have not been frightened into staying silent or avoiding objections?

**1.4. We remain of the opinion that these non-disclosure terms represent a substantial risk to the validity and fully representational nature that is required of all strategic planning examinations.**

## **2. Failure to address concerns about the water supply at Ness House.**

- 2.1. We have consistently pointed out the potential risk of directional drilling and boreholes on the aquifer beneath Ness House, from which it draws water for the 5 properties on that site. The report supplied by SPR examining that risk is partial, curated for the benefit of the applicant and cannot be considered an objective scientific assessment of risk.
- 2.2. We append with this letter an assessment of that report by BA Hydro Solutions Ltd in which it is stated; *“The risk assessment should not be accepted as being complete or valid for the following reason. The risk assessment does not adequately characterise the hydrogeological setting in terms of groundwater levels (including season changes and responses to tide), groundwater quality, groundwater movement, groundwater recharge, groundwater abstractions and other receptors. The risk assessment does not define the route of the boring in any axis and does not start to consider the route or nature of other trenches/services that shall form part of the scheme. Without having adequately characterised the hydrogeology or defining the scheme, the potential impact on the different receptors cannot be risk assessed.”*
- 2.3. This report does not set out the hydrogeological context, the exact nature of the drilling and its positioning or angle of route, without which any assessment is wholly inadequate. It does not quantify the risk, nor does it characterise what risks are acceptable versus those that are so high that they are unacceptable. It is scientifically totally inadequate to formally assess risk.
- 2.4. In asking BA Hydro Solutions to make this assessment we specifically asked for an *objective* assessment of the report; if it found the SPR report to be reasoned and sound then we could be assured and our concerns allayed. We specifically asked them not to give a prejudiced assessment just because we commissioned the report, but to be scientifically unbiased.
- 2.5. To repeat that point, if a scientific and objective report quantifies the risk and that risk is appropriately low, we shall be reassured. **The current SPR report is unscientific, without any measurement and wholly inadequate for making any assessment of the risk of directional drilling to an aquifer 11 metres below ground level.**

## **3. Cumulative impacts**

- 3.1. It is now clear that National Grid Ventures intend to use the Friston substation to connect into the national grid. The cumulative impact of another cable corridor – in NGV’s case being even wider than that for SPR – will have a devastating impact on the local environment, on tourism, on the value of local properties and the social fabric of the community.
- 3.2. We call upon the Examining Authority to take note of the impact over many years from two cable corridors. That impact will dramatically affect local residents especially those

at Ness House, local community facilities such as Wardens Trust, social resilience, social capital and local mental health.

- 3.3.** If a second further cable corridor was consented the properties at Ness House would be enclosed by fencing to the south, west and north-west with a haul road and all attendant traffic, noise and dust over a 5 year period. That would be a devastating burden for those residents.

**4. Recent ground works starting 8<sup>th</sup> April 2021.**

- 4.1. On Thursday 8<sup>th</sup> April we noticed substantial activity in fields surrounding the Ness House property, with more than 10 vans, low-loaders and diggers. These were from Structural Soils Ltd and others, contracted by SPR.

**No notice was given to Affected Persons or Interested Parties that these works were about to start.**

- 4.2. At the same time vans came onto the Wardens site and started to unload equipment onto our property. These vans were also from those contractors. These vans were trespassing on the Wardens Trust site without permission.
- 4.3. I obtained the mobile number of the site manager who stated that his team were undertaking soil surveys and borehole drilling to 40 metres. I informed him that there was an aquifer at 11 metres below ground level, which he did not seem aware of. We made numerous phone calls **but were unable to make contact with any EA1N/EA2 liaison personnel.** We spoke with [REDACTED] and an EA1 phone number. We received an email responses at 15.11 and again at 22.08 The latter stated “.....*The matter was immediately escalated to the Senior Managers and works have been stopped and a meeting called with the Contractor to discuss. Further details of the outcome of these discussions and associated next steps will be available following this meeting. I can only apologise for the concern this has caused you and I will follow up in early course with further details once I have them to hand.*”

**No further contact was received from SPR before the works restarted on 12<sup>th</sup> and 13<sup>th</sup> April. No attempt was made to allay any concerns about borehole drilling breaching the aquifer. No attempt has been made to “follow up in early course with further details..”**

- 4.4. When works restarted on 12<sup>th</sup> and 13<sup>th</sup> April, again without prior warning, it did so in fields immediately adjacent to where horses and ponies are stabled and grazing. That caused enormous alarm to the animals and substantial distress to their owners No prior discussions were had to or attempts to allay concerns or mitigate impacts on animals.
- 4.5. On 13<sup>th</sup> April after works at the site had resumed we received an email asking for permission to use our email addresses to keep us informed for GDPR purposes. The absence of that prior permission cannot be used as a reason for not contacting us, as SRP personal had contacted me by email on 22 occasion between 26/1/21 to 8/4/21 and that of Wardens Trust on 9/4/21 without such permission. That evening we did receive an email from SPR explaining what had been happening. **Why was that after the works had started?**

**The actions of SPR over the last 5 days has demonstrated their total disregard for community liaison and their obligation to keep Affected Persons and Interested Parties**

**informed of developments. They are not a trustworthy company and they do not keep to their commitments.**

**How can the local community trust anything which they say or commit to in the future on the basis of their past behaviours to Affected Persons and Interested Parties in this immediate locality?**

Yours sincerely

Dr Alexander Gimson FRCP  
On behalf of Mrs Elspeth Gimson

14/04/21

Dr Alexander Gimson MB FRCP

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

6<sup>th</sup> April 2021

## **REVIEW OF EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO OFFSHORE WINDFARMS LANDFALL HYDROGEOLOGICAL RISK ASSESSMENT: NESS HOUSE PRIVATE WATER SUPPLY**

Dear Dr Gimson,

B. A. Hydro Solutions Limited (BAHS) have been engaged to complete a hydrogeological appraisal of the East Anglia ONE North and East Anglia TWO Offshore Windfarms Landfall Hydrogeological Risk Assessment, dated 24<sup>th</sup> February 2021, with specific consideration towards the private water supply at Ness House.

While the hydrogeological risk assessment is stated to have been produced to assess the risk posed to the Ness House water supply and wider hydrogeology, it is written more from the perspective of the project. None of the aims and objectives of the document are met, namely being to characterise and address the current groundwater quality, the risk to groundwater and a monitoring regime to assess the potential impact from HDD activities. The document makes almost no mention of the current water quality, the risk assessment is incomplete and covers activities not even documented in the main body of the report [such as 'Over-pumping in the area of the entry pits'] and only proposes monitoring in the Ness House water supply during the HDD activities.

The risk assessment should not be accepted as being complete or valid for the following reason. The risk assessment does not adequately characterise the hydrogeological setting in terms of groundwater levels (including season changes and responses to tide), groundwater quality, groundwater movement, groundwater recharge, groundwater abstractions and other receptors. The risk assessment does not define the route of the boring in any axis and does not start to consider the route or nature of other trenches/services that shall form part of the scheme. Without having adequately characterised the hydrogeology or defining the scheme, the potential impact on the different receptors cannot be risk assessed.

Without first defining the hydrogeological setting, establishing the baseline conditions and setting the proposal in the context of the local hydrogeology the risk assessment cannot be accepted as being complete or valid. The risk assessment mentions work yet

to be completed such as site investigation work and hydrofracture modelling, indicating the risk assessment seems to have been produced prematurely.

In the absence of a comprehensive and robust risk assessment with appropriate field measurements and observations over a suitable length of time; I have serious concerns that the scheme and the author(s) of the risk assessment are being too quick to claim there would be 'no degradation of water supplies is likely to result from the Projects' works'. The proposal to conduct monitoring in the Ness House well during the HDD activities does not constitute a monitoring programme as it does not detail what would be monitored, the frequency, the reporting mechanisms, trigger levels or what would be done if any impact was observed.

An appropriate monitoring programme would involve establishing a network of monitoring points well in advance of work commencing so that baseline conditions can be documented. Water levels, basic physical parameters and routine water quality measurements should be openly reported with analysis and discussion shared with all interested parties. Once it was agreed that sufficient data has been gathered, then a risk assessment could be completed with 3D groundwater modelling to identify all receptors, potential threats, pathways and to assess the risks posed.

It is my professional opinion, based on work completed on other coastal water supplies in similar hydrogeological settings, that the proposed scheme risks distorting the local hydrogeology during construction by dewatering, piling and drilling which are likely to result in a change in the freshwater/saline-brackish interface in the vicinity of the Ness House well. Depending how long the works continue [the document does not even mention timescales], there is a risk that the temporary distortion could become permanent as groundwater finds a new equilibrium. The works may reduce the amount of water available for abstraction at Ness House as the water table is very close to sea level, thus the well is very susceptible to even small reductions in groundwater availability which would result in a greater proportion of water originating from the coastal side of the well and thus turning the water saline.

During the drilling, trenching and enabling works [with soils stripped, excavations open, increased hardstanding runoff, etc] rainfall recharge will inevitably result in the rapid infiltration of fines into the aquifer which may migrate towards the Ness House well, due to the localise depression in water levels as a result of abstraction from the well. The risk assessment does not start to consider turbidity issues in the well as a result of ground disturbance in the local area. Even after the working area has been reinstated, it is not uncommon for turbidity to continue to be a problem until fine material has eventually flushed through the hydrogeological system.

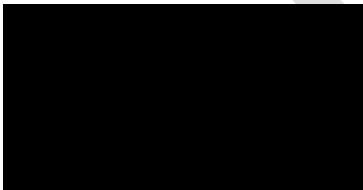
Losses of drilling fluid from the drilled hole risks generating low permeability corridors through the shallow permeable ground [sustaining the Ness House well], especially if it

moves up and down the vertical fractures mentioned, which can result in the shallow aquifer effectively becoming zoned. This may be to the benefit, although more likely a negative result in terms of available water and quality at the Ness House well. The risk assessment refers to environmentally friendly drilling fluids but does not state what they are. There is mention of 'stop-loss' materials, but no specific products are mentioned. Elsewhere, the risk assessment mentions bentonite drilling fluids as a solution to minimise losses, however inappropriate use of bentonite close to potable water supplies can result in raised concentrations of aluminium and other parameters in water supplies.

To conclude, the scheme is not sufficiently developed to allow an adequate appraisal of the risk posed to the Ness House private water supply or any other receptors to be completed. The risk assessment makes broad and unsubstantiated statements asserting there is no risk when insufficient data or no evidence is provided. The source-pathway-receptor risk assessment does not include all risks, a reflection of the underdeveloped scheme and poor hydrogeological conceptualisation. It also fails to consider all mitigation options such as drilling a new deeper abstraction borehole at Ness House.

It is our professional opinion that this risk assessment is invalid in its current form and that substantial work is needed before it can be re-visited to address the genuine concerns of the local stakeholders.

Yours sincerely,



Principal Hydrogeologist