

EAIN, EA2 Windfarm application

EA1N – 004, EA2 – 004. Interested Party Wardens Trust

I am writing again at the request and agreement of the Trustees of Wardens Trust for submission by Deadline 9.

We continue to strongly object to the Scottish Power Renewables (SPR) application.

Our objections, detailed below, are on the following grounds; the cable route; the loss of amenity value for our holiday accommodation; the risks to the Trust's water supply; the cumulative impact of two sequential cable corridors; lack of meaningful engagement and trust.

Wardens Trust has had meetings with SPR on 3 February, 18 March and 23 March 2021, attended by myself and Col Giles Stibbe on behalf of the Trust. We do not believe that our concerns have been fully met at those meetings. In subsequent emails SPR commented that *"What is clear from our discussions is that the Trust is a key community facility"*. For that to be more than just words, SPR will need to address our concerns.

**1. The Cable route deliberately comes to Wardens' boundary.**

From the Directional Drilling site the original cable corridor route angled **deliberately** closer to and touched the western edge of the Wardens site and access drive. In the spirit of partnership, Wardens specifically asked SPR if we could write, jointly together, a letter to the Environment Agency (EA) who are responsible for protecting the local SSI, explaining the rationale for moving the corridor 100 yards west. There has been no response to that request and at a meeting on 23 March we were informed that moving the corridor could not be moved. No formal reasons were given. The landowner was happy for it to be moved. At 21.58 on 14 April we received an email explaining that SPR was seeking to change the route to one which would not touch our western boundary. Whilst we note that concession, our surprise about such a *volte face* remains and the reasons about why what was previously impossible is now proposed are not forthcoming

**2. Loss of amenity value to our site.**

Our clients, adults children and children's groups, come to our site because of its unique clifftop location, and the peace and quiet of the surrounding countryside. There will be a massive impact on that as the haul road for all traffic coming to the Directional Drilling site will pass a few yards from the site where disabled wheelchair bound people come for their holidays. The noise, dust and disruption will be immense. No mitigation has been offered for that intrusion which will ruin the site as a holiday destination.

**3. Risks to the Trust's water supply.**

The Trust relies upon a well water supply from the owner of Ness House. The Trust's Business Continuity Plan has identified interruption to this as a potentially critical issue



which the Trust needs to take cognisance of and to manage proactively. The Trust is aware of the recent report (enclosed) from the Hydrogeologists BA Hydro Solutions Ltd commissioned by the owner of Ness House which was highly critical of the report supplied by SPR. That SPR report was considered wholly inadequate to address the risks to the property's water supply. *"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."*

In short, the SPR report is entirely partial, curated on behalf of the applicant and not a proper objective and scientific assessment of risk. The Trust has not been informed of any mitigations or solutions to this very real concern.

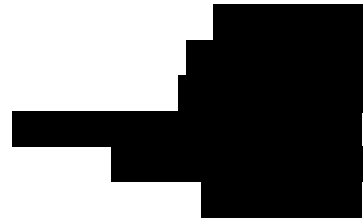
#### **4. Cumulative impacts**

- 4.1.** 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.
- 4.2.** 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, local community facilities such as Wardens Trust, social resilience, social capital and local mental health.
- 4.3.** The Trust does not see how it can survive the prolonged impact of two sequential cable corridors on access to our facility and the use of our unique site by disabled people. The Trust would be enclosed by wide cable corridors, frequent equipment movements along a haul road, and would have no access to the heaths and footpaths that people come to our site to enjoy. That impact, which might now continue for more than 5 years, would be insurmountable.
- 4.4.** A cardinal and unique feature of our site is the peaceful cliff-top location, which adults and children return to yearly for rest, recreation and healing in a natural environment. That will be shattered by the cumulative impact of multiple cable corridors.

#### **5. Lack of meaningful engagement and trust**

The Trust does not believe that SPR is negotiating in good faith or is a trustworthy developer. Our grounds for this include;

- 5.1.** Lack of meaningful engagement with the Trust. Meetings and words do not count as "engagement". We have difficulty in trusting an organisation when their response to our



concerns over the route veer so widely from impossibility of moving the route to considering it to stating it was not possible and then a complete change of mind to recommending it. **Trust is formed by openness and consistency, but SPR have demonstrated neither.**

- 5.2. Lack of any objective scientific assessment of the risks to the water supply. SPR's curated assessment is not an impartial assessment of risk.
- 5.3. Rejection of the Trust's offer to work in partnership with SPR to address the route of the cable corridor with the Environment Agency.
- 5.4. On Thursday 8<sup>th</sup> April two vans belonging to companies contracted by SPR, drove onto the Wardens Trust site. When asked what they were doing they said they needed to move kit which was "too heavy" to carry over the field to where ground investigations were going to be conducted. When the foreman was contacted he said they were about to start surface trench investigations and borehole drilling to 40 metres. They were not aware of the aquifer at 11 metres below the surface. We made numerous phone calls **but were unable to make contact with any EA1N/EA2 liaison personnel.**

Land agents for SPR [REDACTED] when contacted, thought that the contractors "may have been lost", an astonishing admission in such a sensitive Area of Outstanding Natural Beauty.

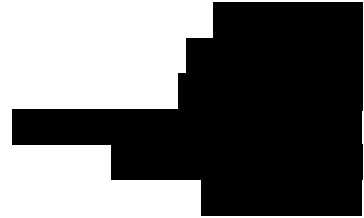
We received an email responses at 15.11 and again at 22.08 The latter stated "*.....The matter was immediately escalated to the Senior Managers and works have been stopped and a meeting called with the Contractor to discuss. Further details of the outcome of these discussions and associated next steps 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.."**

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 occurred nor attempts to allay concerns or mitigate impacts on animals.

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 for GDPR purposes to keep us informed. The absence of that prior permission cannot be used as a reason for not contacting us, as SRP personnel had contacted me by email on 22 occasions 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?**

No prior warning or notification was given to the Affected Persons (Ness House) or Interested Parties (Wardens Trust) that these works were going to start. No reassurance had been given as to whether the aquifer supplying water to Ness House will be breached and what mitigations would be in place. This is an entirely cavalier approach to local



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residents, without any concerns for their anxiety, mental health or apprehensions and demonstrates a totally unfeeling attitude, contemptuous of local resident's reasonable concerns and the local environment.

**We see nothing in the behaviour of SPR which demonstrates that they truly believe Wardens Trust is "a key community facility" as they have described it. Nothing has been done to address reasonable concerns or to work in partnership. Words are not enough.**

**Wardens Trust continues to object strongly to this proposal.**

Yours sincerely

Dr Alexander Gimson FRCP  
on behalf of the Trustees of Wardens Trust

14<sup>th</sup> April 2021