

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 at Deadline 11.

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

Our objections, detailed below, are on the following grounds; the altered 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.

These objections remain, notwithstanding SPR's recent proposal, as we previously suggested, of moving the cable corridor further west.

1. The cable corridor

- 1.1.** 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 was no response to that request and at a meeting on 23 March we were informed that the corridor could not be moved. No formal reasons were given. The landowner was happy for it to be moved. 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.
- 1.2.** The cable corridor even in its present route will significantly impact the enjoyment of clients who come to our site. Access to the walks around the Rye Grass Walk, the Alexander Wood, Thorpe Went and the Thorpeness common will be enormously restricted so that children on Duke of Edinburgh hikes will have to walk down the bye-way and cross a haul road. Our clients inform us that restrictions will significantly impact their access to and enjoyment of our site.

2. Loss of amenity value to our site.

Our clients, adults with 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 close to the site where disabled wheelchair bound people come for their holidays. The noise, dust and disruption will be immense. Despite ongoing discussion no mitigation has been offered for that intrusion which will ruin the site as a holiday destination.

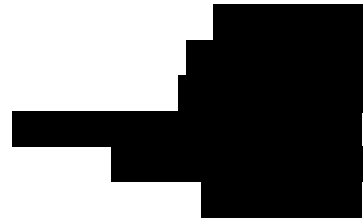


3. Risks to the Trust's water supply.

- 3.1.** The Trust relies upon a water supply from the owner of [REDACTED]. The Trust's Business Continuity Plan has identified interruption to this water supply as a potentially critical issue which the Trust needs to take cognisance of, and to manage proactively. Trustees have not been reassured by the current report from SPR, which does not adequately estimate risk in an objective and scientific manner.
- 3.2.** Risk assessments for ground source water contamination should offer formal assessment of risk – a numerical value. Are SPR saying that there is NO risk – no possibility of any contamination? Or are SPR saying that the risk is very low? That might be acceptable to residents at Ness House if SPR had quantified "very low". Is that a risk of 1 in 10, or 1 in 100, or 1 in 100,000? Risk assessments in other analogous contexts (such as flood risk) are quantified (albeit over a timescale such as a 100 year flood). It is not solely the absence of any numerical risk assessment that is a concern, but also complete lack of engagement with residents as to what is their perceived *acceptable* risk. All well-head water users accept that there is always *some* risk to their water supply. SPR need to ask residents what their perceived additional *acceptable* risk is. Trustees, as users of the well water, might have accepted a risk of 1 in 100,000 but would have rejected a risk of 1 in 10. If SPR had engaged in a dialogue with residents this issue could have been addressed openly and formally.
- 3.3.** A full objective, not curated, report is required. Why this issue has not been dealt with, weeks after the original deadline for completion of the examination and within 4 weeks of the final deadline, demonstrates to Trustees that SPR's approach to this application is either incompetent or arrogant and uncaring of the anxieties of local residents. Neither of those possibilities gives us reason to feel SPR is a trustworthy partner for local residents.
- 3.4.** The Trust has not been informed of any mitigation should their water supply be compromised. Unless SPR are proposing that there is NO risk, because there is therefore SOME risk, we need to hear from the applicants what their mitigation is and agree that with them. No such approach on this topic has been received.

4. Cumulative impacts

- 4.1.** 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 until 2028, 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. Wardens Trust continues to have meetings with representatives of SPR. Trustees do not (yet) have confidence that SPR appreciates the real impact that their proposal will have on residents or the 2600 people (2019 activity figures) we expect to restart using our facility when lockdown is eventually released. Words and meetings, and moving a cable corridor yards away from us, is not real engagement. We see nothing in the behaviour of SPR which demonstrates that they truly believe Wardens Trust is “*a key community facility*” (their words) which they wish to support.

Wardens Trust remains committed to working in partnership with SPR whilst the outcome of their application is considered. We do not see concrete evidence that SPR’s approach is anything more than words. Until we see hard evidence of a recognition of the impact the new route will continue to have on our facility, Trustees believe SPR’s approach (and notwithstanding the route change) is a cynical temporising measure until consent has been granted.

Moving a cable corridor, as has been proposed, has not significantly reduced enough the impact on Wardens Trust of SPR’s proposals, and we therefore continue to object strongly to this proposal in its current form.

Yours sincerely



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

5th June 2021