

From: [REDACTED]
To: [East Anglia ONE North](#); [East Anglia Two](#)
Cc: [REDACTED]
Subject: Deadline 11 Submission. Remarks on Change Request: Amendment to Order Limits at Work No. 9 (Plot 13).
Date: 07 June 2021 17:32:40

Dear Team,

To the Planning Inspectorate.

Deadline 11 Submission.

Personal reference: EA1N: IP: 20024031/AFP 132. EA2: IP: 20024031/
AFP 0134.

These remarks pertain to both East Anglia One North and East Anglia Two Windfarms.

Remarks on Change Request: Amendment to Order Limits at Work no 9 (Plot 13).

1. At Point 7 of the Introduction to The Change Request, Amendment to Order Limits at Work No. 9 (Plot 13), The Applicants state: “ *the change is a minor re-alignment of a short section of the Onshore cable corridor within one plot.*”

If this change is regarded by The Applicants as so minor and limited in significance, I would be interested to know why as late as CAH 3 robust representations were continuing to be made by them as to the impossibility of changing the cable corridor route, and the Applicants’ powerlessness to do anything about it. The failure to do so earlier within the Examination seems to indicate their awareness of good reason not to make such a change.

It was made clear by the remarks of Louise Burton for Natural England in an email read out at Compulsory Acquisition Hearing 3 that there could in fact be scope for discussion in relation to the necessary buffer zone from the SPA, that their reliance on the need to observe that buffer as their reason for resisting change was not valid. The Applicants have often reminded us of their experience in this field of development; it is surprising, then, that previous experience had not made them aware at an earlier stage of the potential for flexibility and discussion in such a matter.

2. At 2.2.1.11, The Applicants state: “ *the increased separation will reduce the (actual and perceived) disturbance experienced by users of the Wardens Trust Property*’

Unfortunately, it is unlikely that this minor re-alignment of a short section of the Onshore Cable Corridor will reduce disturbance, either actual or “perceived”, to any degree to the highly vulnerable and sensitive users of Wardens Trust. It has been apparent throughout the ground investigation works so far how the presence of numbers of contractors, vehicles and working machinery, associated noise and perpetually flashing lights in the vicinity of the Trust and Ness House affect the character and peacefulness of the location, and how intrusive is the noise and activity in such an inappropriate setting. When scaled up, that effect will be dramatically increased.

There will of course be no difference to the significant limitations on access and enjoyment of the vicinity, to noise, light and other pollution. Despite the Applicants’ repeated insistence that Cable Corridor Work is temporary, we know that this term could intermittently extend for up to 10 years, and possibly more in terms of further projects indicated to be headed for the location.

3. At 2.2.3, 15, The Applicants refer to: “*provision of a solid boundary fence along the Western boundary of the newly aligned Onshore cable corridor for the duration of the temporary haul road’s presence*”.

Would the Examiners please consider the implications of this solid boundary fence to be erected for long distances between Margaret Wood and the SPA and the fields at work 9 on the deer whose regular roaming pathway this is?

If unable to pass to or through plots 11, 13, 4, 6 and 7 they will have no access to their regular foraging and be confined to the wood area, increasing the danger of straying on to roads. At present we are all seeing the deer moving in herds and small groups multiple times a day across the entire area of the Landfall and adjoining cable corridor. (Photos attached). This is, it has been stated many times, an important wildlife corridor where there is a sort of geographical bottle neck effect. The destructive effect of its being severed by cable corridor work is highly significant for the local deer population.

4. At 2.2.3, 15, Objective C, The Applicants refer to *Measures to Discourage Birds from Breeding on those Areas of the site to be worked during construction*.

I believe herbicide to be one of these measures. This, with its disproportionately destructive effect on the overall biodiversity of this area, is entirely inappropriate in such close proximity to a SPA and within an AONB. The local farmer has always allowed wild flower growth on verges and margins. The effect of destroying this ecological richness will be extensive.

5. At 2.2.3 17, in relation to the removal of the proposed reduction in the working width of the cable corridor, The Applicants refer to the stockpiles of subsoil and topsoil which will be accrued as a “ benefit’ to Wardens Trust users in respect of noise attenuation.

In aesthetic and environmental terms these stockpiles will be a significant disbenefit.

6. Table 4.1 Environmental Appraisal Regarding Amendment to Order Limits
Additionally, in respect of Ground Conditions and Contamination, The Applicants make Reference to Section 18.5.1.1 of Chapter 18 of the ES (APP-066) which states:

“ Section 18.5.1.1 of Chapter 18 of the ES (APP-066) explains that the excavation of the cable trench, earthworks, and the movement and stockpiling of soils have the potential to mobilise existing ground contamination (where present), which could result in impacts on human health through dermal contact, inhalation and ingestion. In addition, the disturbance of potential contamination could result in pollution of controlled waters if unmitigated.

“The desk-based assessment of land quality (Appendix 18.3 (APP-489)) shows that the majority of the onshore development area crosses agricultural land where areas of significant contamination are not anticipated. However, a potential source of contamination within the vicinity of the realigned onshore cable corridor is identified as a disused, possibly infilled old pit (647380E, 261280N).

“The sensitivity of all human health receptors is considered to be high. The magnitude of effect from exposure to contamination would vary depending on the exposure scenario (e.g. duration of exposure, proximity to contamination). Best practice would control the majority of impacts associated with ground contamination. The magnitude of effect has been assessed as low for construction workers and low for the public. It is anticipated that after adopting embedded mitigation measures as outlined in section 18.3.3 of Chapter 18, the magnitude of effect would become negligible and therefore the potential impact on human health would be of minor adverse significance.”

I understand that the cable corridor route change does not affect this assessment. I include it here as I do not consider the desk based work, with its imprecise conclusion that “*best practice would control the majority of impacts associated with ground contamination*” adequate, and do not see how the conclusions as to negligible magnitude of effect and the potential impact on (highly vulnerable) human health of minor adverse significance, have been reached.

I'd point out again that for such particularly sensitive human receptors, any adverse effect is significant and is a risk that cannot be reasonably taken.

I refer the Panel to all 5 impacts in this assessment, and ask that they give serious consideration to the adequacy of the conclusions reached, irrespective of the relative position of the cable corridor.

Remarks on surveys.

7. To continue in this vein would constitute a retrospective criticism of Chapters 18 to 30 of the ES, which is perhaps not appropriate at this stage.

However, I note yet again that many of the conclusions reached based on The Applicants' surveys simply do not tally with the reality at this actual location.

In terms of **Onshore Ecology**:

Impact 7 States that watercourses and ponds are not present at this location, and yet the Applicants own maps refer to the declivity at Plot 13 which is frequently filled with water and used by migrating birds as POND.

Impact 9 , **Bats** states that *no confirmed bat roost sites have been recorded within the Onshore development area.*

This in itself is remarkable given the extent of that area. However, the Applicants translates that lack of recording of confirmed bat roost as a conclusion as "*an absence of this species at this location.*"

At present there is, as there is every year, constant and prolific activity of pipistrelle bats in our garden, along the track and across all the fields adjacent. It is a false conclusion; and yet it stands.

Impact 10. **Great Crested newts** (which we have observed, apparently emerging from Plot 13 and approaching the pond at Wardens). The Applicants state that "*aquatic habitats are not present at this location* ".

The Panel has seen the wildlife aquatic pond directly over the fence from Plot 13 at Wardens; not within the Order Limits, but surely of significance in this respect as habitat for Great Crested Newts. Again, the statement does not reflect the reality, and yet it stands within the ES.

Impact 11 **Reptiles** states that "*suitable habitat has not been recorded at the location of the Order Limits Change.*"

If reptile surveys have taken place at Work Number 9 - and I would like The Applicants confirmation that such surveys have been undertaken at this site, as I have seen no mats here, to show the grounds for this statement - then the surveys fail.

The area is of course rich in adders as every pet owner knows. We have slow worms in the verges, and lizards regularly appear in the stables on Plot 10 (Photos attached).

Reference has I believe been made elsewhere to the flawed reptile survey at Thorpeness Common. The reptile mats were picked up and tidied away by someone unaware of their function for a period of the survey. At some point they may have been replaced, and a couple of simple printed thin paper sheets attached to a couple of shrubs within vegetation were belatedly affixed to warn walkers of their function. These were unreadable unless you approached closely.

Has this interruption in the survey been made clear within the Examination? Was it well planned, and are its results deemed reliable?

The ES is simply incorrect in so many aspects of its surveys, always to the advantage of the Applicants.

I mention this at this stage, as the Examination moves to its conclusion, to try to convey the enormous frustration and sadness, and anger, so many of us feel in seeing material put before the Examining Authority as the basis of a recommendation to the Secretary of State for consent to a project which will change this region for good, which simply does not bear a true relation to the reality we experience each day and year upon year as inhabitants of this very remarkable terrain.

It does not help to be uncertain as to whether these discrepancies are the result of error, incompetence or bad faith.

In conclusion, then, my response to the Amendment to the Order Limits at Plot 13 is that it will make no useful difference to the users of Wardens, and the original data which has been submitted in respect of the Environmental Statement pertaining to the area does not in any case fully represent the qualities of the location or the potential detrimental effects upon it of these proposed infrastructure projects.

Change in policy, in terms of a time framework for an offshore transmission grid, is under way to reduce the impact on communities of the infrastructure associated with such projects; we are one of those communities for which the Prime Minister pledges minimal disruption; and yet The Applicants, always urging their right to pursue their ends in a timely manner, persist in hastening through this flawed plan in order to conform with Iberdrola's stated global ambition to produce a world beating macro Windfarm complex, The East Anglia Hub, of which these two projects form an integral part along with East Anglia Three.

Iberdrola's goal, according to its website, is to develop all three simultaneously, no doubt in order to minimise costs.

It is not difficult to conclude that The Applicants are likely to be influenced more by their own role and responsibilities in Iberdrola's stated ambitions, than by the bigger picture in policy, both technical and environmental, to which the rest of us are looking for a result that balances social, ecological and economic capital.

As ever, thank you for your consideration of these points.

1. Deer outside 2 [REDACTED] Cottages garden
13, without herbicide.
3. Below - Lizard in stabling, "Plot 10".
Plot 13.

2. Farmer's verges Plot
4. Below- Deer tracks,







