

From: [REDACTED]
To: [East Anglia ONE North](#); [East Anglia Two](#)
Cc: [REDACTED]
Subject: Deadline 12 submission.
Date: 28 June 2021 22:58:31

To the Examining Authority.

Deadline 12 Submission.

Ref: EA1N: IP 20024031. AFP 132.
EA2: IP 20024032. AFP 0134.

These remarks are in respect of both East Anglia One North and East Anglia Two.

1. Aquifer and water Abstraction at Ness House.

At Deadline 11 The Environment Agency (EA) submitted a document (Rep 11-112) addressing the Applicants' Hydrogeological Risk Assessment (Rep6-021) on HDD at Landfall.

The submission, in the form of a letter from a Planning Specialist, considers the wider effect of HDD on the aquifer, and on the water Abstraction at Ness House, and, briefly, matters concerning the Substation at Friston.

As the Environment Agency has previously expressed no interest in the potential damage to the aquifer, or to the private water supply at Ness House, I would assume that the EA's submission, at this critical stage in the Examination, has been provided to the Examining Authority at the request of The Applicants in their own support. This indicates that the Applicants recognise the significance of this issue in their Application for Consent.

I have no ability to comment on any technical remarks in this letter regarding water flow, but would make the following remarks.

I note that throughout the submission, the Environment Agency's position in respect of the Applicants' researches to date is extremely tentative.

The document notes that:

" whilst we have no objection to the work completed to date, further study and explanation regarding protection of water supplies will be required prior to the commencement of construction.

The Environment Agency has no objection to The Applicants' work to date, but requires more study and explanation. Much like the Examining Authority, in fact, in respect of the further study and explanation. It isn't acceptable that such information has still not been made available, and will not be within this extended Examination. No reasonable judgment in favour of the Applicants on this point can be made in the continued absence of such detailed evidence.

The submission goes on to note, rather vaguely, that

“Horizontal Directional Drilling (HDD) is a fairly widely used technique, and may be proposed to avoid disruption to surface water features or designated ecological sites. “

Perhaps it may. One might find such a remark on the internet if one sought general information about HDD. Is this pertinent at this point in the Examination, when we're seeking detail and amplification?

The submission continues in terms that are disturbingly familiar from the Applicants ' Hydrogeological Risk Assessment, to remark on the generically “ environmentally friendly drilling fluids...” which mean that there “ *should not be any significant adverse water quality impacts.* “

The ExA has already asked for further clarification on these drilling fluids. We have none as yet.

The Environment Agency goes on to state that :

“Prior to the commencement of the works, the Applicant will need to provide further information on how seawater entry will be precluded and to indicate whether the inflow of say line water would in any way reduce the capacity to seal the HDD bore. It would also be useful for the applicant to provide an assessment of the impact on the aquifer should say line water into the bowl and move into the surrounding aquifer. “

Therefore the EA recognises the risk of seawater contamination and considers that the Applicants have not yet adequately addressed this issue at this advanced point in the Examination.

The submission continues in terms familiar from SPR's arguments: “ *is likely*” ..”*should not*”....

The EA state that :

“ While it is possible that the HDD bore will act as preferential flow pathway, this will be a localised effect and will not exert significant influence on the direction or rate of groundwater flow in the wider aquifer. Furthermore, if the HDD bore is orientated East-West it will have no potential to influence groundwater flow to the north or south of it in terms of either a barrier or a preferential pathway.”

Here the EA refers to the significance of the impact on mother wider aquifer. However, they go on to suggest that it will be:

“useful to look more directly at the potential for impact at the Ness House well. “

The EA's caution here reflects the fact that nothing has yet been established clearly by the Applicants in respect of this important issue of water supply to dwellings and a community resource for vulnerable children and adults at

Wardens and Ness House.

It is disappointing and significant that at this point in their argument, the EA is wrongly informed, either by The Applicants or their own research.

They state that:

“ Given that the Ness House well is unlicensed, the owners may only pump a maximum of 20m³/day . This is a very low rate being paid taken from a granular aquifer with high storage, albeit with a low saturated thickness (based on the information provided in the public representations).

We have heard from Colin Innes for the Applicants, much earlier in this process, that the term “Unlicensed Abstraction “ as used on SPRs groundwater Map to indicate the well at Ness House. does not imply that the Abstraction at Ness House is in fact unlicensed. The ExA has received data from the Trustees communication with the Council to prove otherwise.

It is hard to understand why the EA are misinformed on this important point. They may also be unaware of the large groups of visitors to the site, at Wardens Trust, who rely on this water supply throughout the year, as well as the dwellings and livestock. Such low rate per day, as cited above, to provide a constant supply of safe and potable water is not, to my knowledge, being pumped to the amounts that accord with the EA’s Statement.

In these important matters we rely on the expertise and good judgment of the Environment Agency. However, we note that, as stated above, they rely on information provided in the public representations. Which representations? There is disagreement between parties on these matters. Should the EA not be in a position to be more conclusive?

With reference to the very significant issue of the Coralline Crag, the EA states:

“ A more detailed description of the physical characteristics of the....coralline crag (with references) may also help allay the concerns of the local residents in due course. “

I am happy to see that, along with many of us following this Examination, the EA consider that The Applicants ‘ analysis of the physical characteristics of the Coralline Crag to date are still inadequate.

In summary, I suggest that the Environment Agency’s submission, by highlighting the omissions and lack of detail in The Applicants ‘s documentation to date, serve to point out the flaws in SPRs representations to the Examining Authority on these matters.

2. Examining Authority’s questions to the Applicants. Temporary Water supply Ness House/ Wardens. (Rep11-089)

3.7.2.

“A temporary potable water tank will be placed at a location to be agreed with the landowner.... And will be tied into the existing pipework from the well at an agreed location....

In respect of SPRs response to the ExA question, in terms of the water supply to Ness House and Wardens, I maintain the position that the proposed mitigation is not acceptable. It can't possibly achieve what it would need to should that become necessary as a result of contamination caused by HDD or other construction activities. Isn't what SPR propose here effectively, as Dr Gimson asked that it should not be, a bowser? Nothing has really moved forward. The same form of words is used to respond the the ExAs question ascwas used at Deadline 6.

How could any such arrangement service multiple large groups at Wardens through hot weather, as well as all the households, one of which has two adults and five children in residence most of the time during the summer, and Avocet and all at Ness House? Horses at grazing on the site draw on this water resource too. They consume a huge amount of water.

There is also no knowing how long such an arrangement might have to be in place and functioning. That would necessitate a lot of unwanted visits at a site where visitors are controlled due to the vulnerable characteristics of people on site.

As far as the siting of any such structure providing such a supply how large is it to be? How could it be accommodated?

It is also likely that any contamination might become evident retroactively, in months or years afterwards. To this extent I'd wish that the ExA's question had incorporated that point. It is simply an unacceptable risk in the face of SPR's inconclusive arguments on potential contamination or compromise of the aquifer.

Ultimately, the issue of risk to the Wardens/ Ness House water supply has not been adequately answered at all, although the question has been outstanding since Deadline 5. Re-iteration of the same position in different terms on behalf of the Applicants doesn't indicate engagement in good faith with this matter of serious concern.

End.