



EAIN, EA2 Windfarm application

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

Deadline 13 submission

I am writing again at the request and agreement of the Trustees of Wardens Trust for submission at Deadline 13.

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

We are calling for the Examining Authorities to recommend to the Secretary of State a 'split decision' so that:

1. The offshore turbines are recommended for consent.
2. The onshore infrastructure is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or industrialised site.

We are aware that this solution is supported by our local MP Dr Therese Coffey.

There are many arguments against the proposals in their current format as described by others including the [Biodiversity Impact](#), [Tourism and Economic Impacts](#), [Air Pollution and other community impacts](#) and the [Cumulative Impact](#), all of which we support as they are directly relevant to the Ness House property and the impact of the proposals on residents and visitors at that site.

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 Horizontal Directional Drilling (HDD) 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 footpaths around the Rye Grass Walk, the Alexander Wood, Thorpe Went and the Thorpeness common will be massively restricted. Children on Duke of Edinburgh's Award 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.
- 1.3. The cable corridor and associated haul road with regular and extensive traffic to the HDD site will have a major noise, dust and visual impact. The peace and tranquillity of the site, which clients cherish for its restorative atmosphere will be damaged.

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

- 2.1. 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 Horizontal Directional Drilling site will pass close to the site where disabled wheelchair bound people come for their holidays. The noise, dust and visual disruption will be immense. The proposed mitigation of higher fencing and sound barriers is risible and does not alter the substantial intrusion which will ruin this site as a holiday destination for disabled children and adults.

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

- 3.1. Wardens Trust relies on a fragile water supply from the owner of [REDACTED]. The Trust has consistently pointed out the potential risk of directional drilling and boreholes to the aquifer supplying water to the [REDACTED] site and Wardens Trust. The report supplied by SPR examining that risk cannot be considered an objective scientific assessment of risk.
- 3.2. We have previously submitted a report by BA Hydro Solutions Ltd in which it is stated; "**The risk assessment (from SPR) 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.*"
- 3.3. The SPR 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 risk. It is scientifically inadequate to formally assess risk.
- 3.4. We note that SPR have now offered a temporary water bowser for the use of residents at the site. That offer comes without any relevant information concerning where it will be sited, whether and where it will be connected into the main water supply; whether is just drinking water or whether it will have a big enough volume to supply bathing/shower



facilities to Wardens Hall (there are 3 baths and 4 showers at the Hall) and the duration and safety of such a connection. **If the well water is contaminated, how long will it be contaminated or will it be permanent?** The Trustees of Wardens Trust have unanimously rejected the proposal as it stands as inadequate in supplying the water needs for the groups of up to 20 children who may come to the Wardens Hall.

- 3.5. Wardens Trust offers bathing facilities for elderly disabled and wheelchair bound local residents unable to access a bath in their own home. Prior to the pandemic the Trust was undertaking up to 16 baths each week. Will this service be interrupted and if so for how long?
- 3.6. To repeat our point, SPR have thus far not supplied an adequate hydro-geological risk assessment. The fact that they are offering a temporary water bowser indicates that SPR admit there is **SOME** risk. If there was **NO** risk, there would be no need for a temporary water bowser. **The issue that the Examining Authority has to consider is, what is the magnitude of that risk.** Is the risk 1 in 10 or is the risk 1 in 100,000, or is it impossible on the evidence currently available to make any assessment of that risk?
- 3.7. Nowhere in their assessments have SPR numerated that risk. That is clearly unacceptable. Vague comments about mechanisms to seal the drill channel without any assessment of the risk that those mechanisms might fail or be inadequate are not acceptable. **The users of the [REDACTED] water supply require a numerated risk so they, and the Examiners at this enquiry, can understand and decide whether that risk is acceptable or not.**
- 3.8. Because of the inadequacy of any assessment of risk by SPR, we have commissioned a further hydro-geological assessment by BA Hydro Solutions, enclosed with this submission. We specifically asked for this report to be objective. In contrast to SPR's reports it was not to be curated for the benefit of the commissioner of the report but to be, where possible, a formal rigorous and objective assessment, with the following objectives.
 - Document field work and monitoring completed local to Ness House.
 - Confirm the geological sequence.
 - Define the hydrogeological setting.
 - Consider where groundwater is present.
 - Document current and historical groundwater abstractions from the same horizon the Ness House abstraction likely draws from.
 - Develop a conceptual hydrogeological model of the Ness House site.
 - Develop a basic groundwater flow model in order to test different scenarios.
 - Discuss the risk posed to the private water supply from the proposed cable installation.
- 3.9. This report has made a number of recommendations which include;
 - 3.9.1. ***In the absence of reliable data and it only being possible to construct a limited hydrogeological conceptual model it is not possible to conclude there would be no impact from the proposal.***
 - 3.9.2. ***In the absence of a detailed design, it is not possible to accurately and reliably appraise the risk, to ascertain whether sufficient work has been done to ascertain the***



risk, to assess what else needs to be done and/or for permission to be granted for such a scheme.

- 3.10. SPR only acknowledged that there was a fresh water drinking supply at for 5 residencies at Ness House during 2020, more than a year after starting on the planning process. That we have now come to the end of the planning process without enough detail for residents to make an assessment of risk demonstrates an entirely cavalier, arrogant and seemingly incompetent approach to this planning process.
- 3.11. We do not see how the Examining Authority can give permission for HDD so close to a fresh water drinking supply when an objective assessment states that there is no or inadequate data available to assess the risk to that supply. Mitigation with a water bowser, the details of which and duration of which is unknown, is not an adequate solution to that unknown risk.

4. Cumulative impacts

- 4.1. It is now clear that National Grid Ventures (NGV) 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 which would be present until 2028. 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.
- 4.3. Irrespective of the exact route of SPR's Cable corridor, two of the potential routes being considered by NGV immediately impact Wardens Trust. Consent for a second additional NGV cable corridor would result in Wardens Trust being enclosed by fencing to the south, west and north-west with a haul road and all attendant traffic, noise and dust until approximately 2028. That would be a devastating burden for those residents at the Ness House site and crucially users of the Trust's facilities.

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.



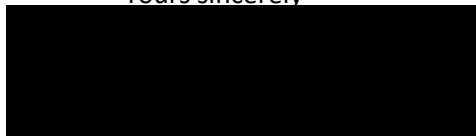
5.3. Rejection of the Trust's offer to work in partnership with SPR to address the route of the cable corridor with the Environment Agency.

5.4. Wardens Trust contacted the applicants prior to Deadline 13 to ask if any further mitigations for the substantial impact their proposal will have on our charity. We were informed that nothing further was forthcoming. Trustees do not have confidence that SPR appreciates the real impact that their proposal will have on 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 understand charitable activities, the improved quality of life and wellbeing associated with peaceful cliff-top sites or really believe Wardens Trust is "*a key community facility*" (their words) which they wish to support.

Until Trustees see hard evidence of a recognition of the impact the new route will continue to have on our facility and the amenity value of the site, Trustees believe SPR's approach (and notwithstanding the route change) is a cynical temporising measure until consent has been granted. Trustees are charged with protecting and maximising the long term value and contribution of this charity for the benefit of the wider population, as our Articles of Association require. Trustees will therefore continue to work with all parties who support those aims.

Notwithstanding the present proposed changes within the draft DCO, the current proposals from SPR and cumulative impact from future proposals up to 2028 from NGV will have a massive impact on this charity, threatening its long term viability. Wardens Trust therefore continues to object strongly to this proposal in its current form.

Yours sincerely



Dr Alexander Gimson FRCP
On behalf of Trustees of Wardens Trust

04/07/2021