

Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS Supplementary Submission on
Cumulative Impact**

Deadline 13 – 5 July 2021

The final Deadline before the nine month examination
closes at midday 6 July 2021

by

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

Unique Ref. No. EA2: 2002 4496



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SEAS Supplementary Submission on Cumulative Impact

Deadline 13 – 5 July 2021

1. This is a supplementary submission by SEAS on cumulative impact.
2. This submission should be read in conjunction with SEAS's previous submissions on cumulative impact, (Deadline 11 Submission [[REP11-183](#)], Deadline 9 [[REP9-087](#)], Deadline 8 [[REP8-242](#)], Deadline 6 [[REP6-141](#)] and Deadline 5 [[REP5-115](#)], in addition to our original Written Representation submitted at Deadline 1 [[REP1-328](#)] on this topic).
3. In our submission on cumulative impact made at Deadline 6 on 24 February 2021 immediately after the Vanguard judgment we drew attention to the fact that SPR has chosen what was by far the largest of the possible sites which had been identified notwithstanding its distance from the coast and submitted that this spoke for itself. [[REP6-141](#)]
4. Over the last couple of months SPR has carried out extensive digging of the entire site identified in the DCO. We understand the purpose of the digs to be to investigate the soil properties and identify whether there are any archaeological remains. It is notable that the operation goes way beyond the locations identified for the construction of the substations and the laying of the cable corridor. On some days more than 30 operatives have worked on this with a lot of heavy machinery. The cost must be immense.
5. Two contradictory explanations have been offered for the extent of these works by those working on the site: (i) that they are needed to refine the location of the cable corridor, and (ii) they are to assess the suitability of the land for mitigation measures for example the planting of trees. Neither is credible.
6. In the absence of a credible explanation one of our volunteers wrote to the Applicant's official spokesperson, Ms Joanna Young, asking why the works extended to the whole site. She replied that SPR was required to survey the entire site. She has been asked now on no less than 4 occasions who had imposed this requirement on SPR and eventually she has responded to say that in fact "*no requirement has been imposed by a third party rather the investigation works are being undertaken to inform future engineering design, environmental management and to support the detailed design of the projects*". This contradicts her original



reply and does not of course begin to explain why the entire site is being excavated. We attach the email chain in question [Appendix One].

7. We also attach a video taken by a drone by another of our volunteers which graphically depicts the extent of these operations [Appendix Two]. We estimate that the two proposed substations and cable corridor would occupy 20% of the total site yet as can be seen SPR has dug up the whole of it.
8. SPR's approach to cumulative impact has been to ignore it or provide the minimum possible information. We do not believe it has been candid. For example, as stated in our Deadline 9 submission [[REP9- 087](#)] it had misstated, and continues to misstate, the position of North Falls in an attempt to mislead the ExA on this topic.
9. In the absence of any credible explanation for the extent of these works, and noting the repeated failure to answer a very simple question followed by a retraction of the original reply, we invite the ExA to make the only reasonable inference which is that SPR has surveyed the entire site pursuant to an agreement with or with a view to selling the survey to other developers or energy companies or itself further exploiting the site. The whole site would not have been surveyed by SPR at huge expense absent a plan to build other substations there.



APPENDIX ONE

From: "Young, Joanna" [REDACTED] [scottishpower.com](mailto:[REDACTED]@scottishpower.com)>

Date: 30 June 2021 at 16:44:46 BST

To: Anthony Fincham [REDACTED]

Cc: East Anglia Two <eastangliatwo@scottishpower.com>, East Anglia ONE North <eastangliaonenorth@scottishpower.com>

Subject: RE: EXTERNAL:Friston

Dear Anthony,

The onshore site investigation works are not being undertaken to adhere to a 'requirement' imposed by a third party, rather, and as noted previously, they are being undertaken to inform future engineering design, environmental management and to support the detailed design of the projects.

The onshore site investigation works that are currently being undertaken are typically undertaken post consent however the Applicants have scheduled these site investigation works to be undertaken at the present time in order to maintain the Projects' development programme and allow for the rapid deployment of much needed renewable energy in line with Government policy should the Projects receive consent. It is therefore a legitimate requirement of the Projects that these works are undertaken at this stage.

These onshore site investigation works comprise:

- Ground investigations (to confirm the soil properties necessary to enable the detailed design of the projects); and
- Archaeological investigations (to establish the extent or otherwise of buried archaeology within the onshore development area).

All of the investigation works are being undertaken within the projects' Order limits and on land where voluntary agreement with the relevant landowner has been obtained. The scope of the archaeological investigations and the locations of the archaeological trial trenching have been agreed with Suffolk County Council Archaeology Service.



As noted in my previous response, further details can be found within the Applicants' Statement regarding Ground Investigations Work (REP 10-029) submitted into the Examinations at Deadline 10.

Kind regards,

Joanna

Joanna Young | Stakeholder Manager | East Anglia

[REDACTED]

[REDACTED]

-----Original Message-----

From: Anthony Fincham [REDACTED]

Sent: 22 June 2021 10:43

To: Young, Joanna [REDACTED] ScottishPower.com>

Subject: Re: EXTERNAL:Friston

Dear Joanna

Could I please hear for you in reply to my email below?

Best wishes

Anthony

On 17 Jun 2021, at 16:26, Anthony Fincham

[REDACTED] wrote:

Dear Joanna

Thank you for your email.

You have still not answered my simple question of who has REQUIRED the extensive excavations? They go way beyond the proposed sites of the power stations and cable corridor. They have come as a surprise to local inhabitants and also represent a disruption- we no longer feel able to walk our dog as usual with the public footpath turned into a road- and we would like to know who has imposed this requirement on SPR. The fact that the excavations may have been agreed with SCCAS is a different matter.

Best wishes

Anthony



On 17 Jun 2021, at 15:39, Young, Joanna
[REDACTED] <[REDACTED]@scottishpower.com> wrote:

Dear Anthony,

In terms of further details regarding the archaeological investigations please refer to the following submission made at Deadline 10:

- EA1N EA2 Applicants' Statement regarding Ground Investigations Work

(REP 10-029)

The locations of the archaeological investigations have been agreed with Suffolk County Council Archaeological Service and seek to establish the extent or otherwise of buried archaeology.

Kind regards,

Joanna

Joanna Young | Stakeholder Manager | East Anglia

[REDACTED]
Internal Use

-----Original Message-----

From: Anthony Fincham [REDACTED]

Sent: 04 June 2021 15:29

To: Young, Joanna <jyoung@ScottishPower.com>

Subject: Re: EXTERNAL:Friston

Thank you Joanna but the question remains who is responsible for the requirement whether it be standard or otherwise? It is odd and has given rise to much surprise locally that, no doubt at great expense, you have gone so far beyond the proposed site.

Kind regards



Anthony

On 4 Jun 2021, at 12:22, Young, Joanna
[REDACTED] [scottishpower.com](mailto:[REDACTED]@scottishpower.com)> wrote:

Dear Anthony

Apologies if the use of the word required has caused confusion. What was meant was that the type of investigation works currently being undertaken on site at Friston are a standard requirement to inform the design for these types of projects, if consented.

Kind regards

Joanna

Joanna Young | Stakeholder Manager | East Anglia
[REDACTED]

Internal Use

-----Original Message-----

From: Anthony Fincham [REDACTED]
Sent: 04 June 2021 11:13
To: Young, Joanna [REDACTED]@ScottishPower.com>
Subject: Re: EXTERNAL:Friston

Dear Joanna

Thank you very much for getting back to me but I note you haven't answered my question.

In your email of 24 May you said you were REQUIRED (my emphasis) to investigate the wider area and I asked who had imposed that requirement. Would you please let me know.

Judging from the small army of orange clad operatives digging up all the fields SPR must be incurring a huge cost in this exercise. The explanation you give lacks credibility and contradicts two different explanations (each contradicting the other) given by the foreman and another operative working on the site.

I appreciate that I should be able to get to the facts by making a Freedom of Information Act request of Suffolk County Council Archeology Service but surely you can please answer my simple question.

Best wishes

Anthony Fincham



On 4 Jun 2021, at 10:11, Young, Joanna [REDACTED]@scottishpower.com> wrote:

Dear Anthony,

We are investigating the ground conditions in the onshore development area, including in and around any proposed structures. This provides more certainty on ground properties to inform future engineering design and environmental management if the project is consented.

The locations for current archaeological trial trenching have been agreed with Suffolk County Council Archaeology Service and extend beyond the substation footprint. The purpose of these investigations is to establish the extent or otherwise of buried archaeology in the area around the substations and the cable corridor.

Ground investigations and archaeology investigations all occur within the red line boundary.

Best wishes,

Joanna

Joanna Young | Stakeholder Manager | East Anglia

[REDACTED]

Internal Use

-----Original Message-----

From: Anthony Fincham <[REDACTED]>

Sent: 29 May 2021 10:11

To: Young, Joanna <jyoung@ScottishPower.com>

Subject: Re: EXTERNAL:Friston

Dear Joanna

Thank you for getting back to me.

Could you please let me know who has imposed this requirement?

Best wishes

Anthony Fincham

On 24 May 2021, at 14:35, Young, Joanna [REDACTED]@scottishpower.com> wrote:

Dear Mr. Fincham,

Thank you for your email.

We are required to investigate the wider area within our proposed Development Consent Order limits and around the proposed infrastructure location to ensure we fully understand the soil properties in the vicinity and to understand any archaeology within those limits.



Kind regards,

Joanna

Joanna Young | Stakeholder Manager | East Anglia

[REDACTED]

[REDACTED]

-----Original Message-----

From: Anthony Fincham [REDACTED]

Sent: 21 May 2021 10:14

To: Young, Joanna <jyoung@ScottishPower.com>

Subject: EXTERNAL:Friston

Could you please let me know why SPR are undertaking archeological digs on land at Friston which is outside the proposed sites for the power-stations and cable corridor.

Thank you

Anthony Fincham

Sent from my iPhone

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APPENDIX TWO

Drone footage of ground investigation works at the substation site of Friston

https://www.youtube.com/watch?v=1WzDwse_HzU