



EAIN, EA2 Windfarm application

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

This submission responds to the request issued by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) on 2nd November 2021.

We are asking the Secretary of State to recommend 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.

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 impact of the proposals on the 2600 visitors¹ at the Wardens site (2019, pre-pandemic figures).

Our Trust's objections include: the cable route and threat to the fragile cliff; the loss of amenity value for our holiday accommodation; the risks to the Trust's water supply; the cumulative impact of sequential cable corridors; the use of non-disclosure agreements

1. The cable route

- 1.1.** The proposed cable route under the cliffs at the Ness are a serious potential risk to the fragile geology and corraline crag, with a risk of increased erosion to cliffs to the south.
- 1.2.** The cable specifically closes towards the Wardens Trust site will significantly impact the enjoyment of neurodiverse 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 such 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

¹ 2019, pre-pandemic figures.



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 Ness House. The Trust has consistently pointed out the potential risk of directional drilling and boreholes to the aquifer supplying water to the Ness House site and Wardens Trust. The report supplied by SPR examining that risk cannot be considered an objective scientific assessment of risk.
- 3.2.** We note that SPR have 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.
- 3.3.** 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?
- 3.4.** Because of the inadequacy of any assessment of risk by SPR, we commissioned a further hydro-geological assessment by BA Hydro Solutions, enclosed with prior submissions. This report has made a number of recommendations which include;
 - 3.4.1.***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.*
 - 3.4.2.***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.*
- 3.5.** Since the end of the formal Examination process SPR have undertaken at least 5 boreholes into the aquifer which supplies water to the Trust and the other four properties at Ness House. If SPR is allowed to submit such data to the Secretary Of state without residents or Affected persons being able to interrogate or question that data that will be entirely unfair and liable to judicial review.

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.** 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.
- 4.3.** A detailed assessment of the cumulative impact of both corridors must be undertaken before any rational objective assessment of the SPR application can be given.

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 of Wardens Trust strongly feel that the impact of either or both the proposed cable corridors will have an existential threat to the charity's existence on our site.

Yours sincerely



Dr Alexander Gimson FRCP
On behalf of Trustees of Wardens Trust

30/11/2021