From: Save Our Sandlings <info@saveoursandlings.org.uk>
Sent: 14 December 2020 21:59
To: East Anglia ONE North; East Anglia Two
Subject: Response to ISH 1_2 - Deadline 3
Attachments: SOS - PINS ISH1 response.pdf; SOS - PINS ISH2 response.pdf

Please find attached our response to Issue Specific Hearings 1 & 2.

Kind regards

Save Our Sandlings

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For more information please see:
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or Twitter:
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Offshore Wind Farms

EAST ANGLIA ONE NORTH PINS Ref: EN010077

&

EAST ANGLIA TWO PINS Ref: EN020078

response from

Save Our Sandlings

Issue Specific Hearing 1

Responses to Issue Specific Hearing 1 1st December 2020

Agenda item 3 Effects on Offshore Ornithology (inc. HRA considerations)

Sizewell hosts the southernmost colony of Kittiwakes in the UK nesting on the inlet and outfall water pipe towers of the decommissioning Sizewell A power station. We are concerned that this colony may experience disruption of their sea areas by the introduction of wind turbines. It should be noted that colony numbers appear to have been unaffected by the Greater Gabbard and Galloper offshore wind turbines, but this may be as they have relocated further northward away from these arrays. The introduction of the 2 arrays for EA1N and EA2 may result in the Sizewell colony moving into the range of colonies off Lowestoft and further north, resulting in increased competition for food.

Agenda Item 6 Effects on Terrestrial Ecology

We welcome the applicant's intent to phase onshore working outside of the nightjar nesting seasons. We also note the applicant intends to install both cable duct for both projects EA1N and EA2 together even if the projects are constructed sequentially. Save Our Sandlings would prefer that both projects to proceed consecutively to minimise disruption to not only to wildlife and local ecology, but also the very many residents close to the cable route. We are concerned following the applicants statement that there could be a gap of several years between the 2 projects. Stringing both projects out over several years will inevitably increase the disruption and potential cumulative effects over a longer period of time. Tree planting and landscaping is planned as mitigation but will this have to be delayed until both projects are complete or can this proceed as part of the initial project phase? Should planting be delayed until the completion of the second project phase, then for any effective mitigation for tree and shrub loss during construction will not be present for a minimum of 10 – 15 years allowing for 4 years for each project (8 years) and up to 7 years for plants to become established. Add to this the delay between each phase and the time stretches further.

We are also cognisant of the other projects planned for this area, namely National Grid Ventures Nautilus and Eurolink and the RWE / SSE partnership Five Estuaries and North Falls projects. Delaying the second phase of EA1N and EA2 projects may coincide with any or all of these subsequent projects causing unacceptable levels of disruption and cumulative impact to the area. Throughout the period of the early 2020's through to mid 2030's EdF may also be constructing Sizewell C New nuclear power station. Whilst the main site works are to the North of planned landfall area, cable runs and substation complex, a number of roads are shared for all construction personnel and light goods vehicles. This will lead to major disruption to local residential traffic and particularly to business and recreational visitors to the area. Unlike many UK holiday destinations, East Suffolk remains a popular destination year round and does have a defined seasonal period.

We are also concerned that the HDD trenching technique may not be the preferred option for crossing the SPA in Work Area 12 (Land plan areas 22, 23 & 24, sheet 3, i.e., Horse paddock C and footpath 23 from Halfway Cottages to the junction of footpaths 24, 25 & 26)[1] [2]. Footpath 23 has a number of mature broadleaved trees, bushes and shrubs, providing excellent cover and a food source for a large number of bird and mammal life, most especially nightingale and collared dove. Nightingales have been regularly returning to this location only in the last few years from a single individual singing less than 10 years ago. Up to 4 individuals can been heard along this path and numbers are gradually increasing. Walking these paths daily during the daytime and early evening, sightings of buzzard, kestrel, barn and little owl can be sighted patrolling and hunting along the fields

[1] 2.2 Land Plans

[2] 2.3.2 Works Plans (onshore)

and hedgerows, with bats hunting at night. Along footpath 23 glow worms are found during the summer months which are very sensitive to light, needing a dark environment for their bioluminescence to be seen by potential mates. Additionally in late summer, following periods of prolonged rainfall, toads come out at night as they travel towards spawning grounds. A great many species inhabit or transit through the Sandlings and are not always readily detectable, leaving few or no signs of their passing. Some are obvious, such as the red deer and muntjac, leaving their spoor and slots on the ground. The footprints of fox and badger are also present, the former are heard calling at night. For all the above reasons we feel it is vitally important that open trenching in Work Area 12 (Land plans 22, 23 & 24) and Footpath 23 should not be undertaken and HDD technique must be the default method of crossing this valuable natural feature, preserving the wild habitat and the valuable lifeline it provides. Whilst this habitat is relatively species rich, most are not immediately noticeable to the casual observer but are responsible for maintaining the eco balance of predator and prey and supporting the abundant birdlife.

We refer to the submission about The Wardens Trust and the important work carried out in the community, working with local elderly residents and many disabled and vulnerable children and young adults. In the 40 years of its existence the trust has compiled survey records of the flora and fauna local to Wardens, which is very extensive. The proximity of the cable run, (Land Plan area 11, sheet 3) to Wardens properties will have a devastating effect not only on plant, bird and animal species, but the peace and tranquillity of the refuge that is so vital to the respite care of visitors to this sanctuary.

Further along the cable corridor at land plan area 15 passes adjacent to White, Pebble and Ivy cottages. Apart from the noise and vibration from trenching works, the light sandy soil is very prone to becoming airborne when disturbed. The wind is predominantly from the west and disturbed soil will travel directly towards these properties. The light soil particulate will be extremely harmful to a number of residents who have existing COPD conditions and they fear a decrease in air quality through soil blow and fumes from plant equipment will lead to a further deterioration in their health. There have been no discussions by the applicant with affected residents to discuss any means of permanent or temporary mitigation during construction works. On the few days that farm machinery works on these fields, residents are able to make personal arrangements to lessen or mitigate any impact. These projects will last several months / years leading to potential extensive periods when staying at home presents a very clear danger to the health of these residents. These issues were highlighted during various consultation events with the applicant but have not resulted in any positive action from them.

Offshore Wind Farms

EAST ANGLIA ONE NORTH PINS Ref: EN010077

&

EAST ANGLIA TWO PINS Ref: EN020078

response from

Save Our Sandlings

Issue Specific Hearing 2

Responses to Issue Specific Hearing 2 2nd – 3rd December 2020

Agenda item 2 Context and update

a) Sizewell hosts the southernmost colony of Kittiwakes in the UK nesting on artificial structures, namely the inlet and outfall water towers of the decommissioning Sizewell A power station. We are concerned that this colony may experience disruption of their sea feeding areas by the introduction of wind turbines. It should be noted that colony numbers appear to have been unaffected by the Greater Gabbard and Galloper offshore wind turbines, but this may be as they have relocated further northward away from these arrays. The introduction of the 2 arrays for EA1N and EA2 may result in the Sizewell colony moving into the range of colonies off Lowestoft and further north, resulting in increased competition for food.

b) We are very concerned of the cumulative impact of the SPR projects, the proposed Sizewell C project and combined traffic for Sizewell A and B power stations and how this increase will affect visitors and residents travelling to Sizewell. EdF plan to build an access road to the construction site removing their traffic from Sizewell Gap Road, but will not happen until year 2 or 3 of their project. During this time ALL traffic to Sizewell C site has to travel along Sizewell Gap Road. Every 18 months Sizewell B has a refuelling outage with a resultant increase in traffic numbers of 2000 – 3000 vehicle movements a day for the 8 to 10 week outage period. Dependent upon when SPR and EdF projects start there could be at least 3 refuelling outages. There is also the ongoing decommissioning at Sizewell A to consider. The site is currently in a Care and Maintenance Preparation phase and little 'heavy' decommissioning work is taking place. We are aware that this may change in the near future as work to decommission and deplant the turbine hall may start at any time. Sizewell Gap road is the only road into and out of Sizewell village and surrounding properties and is vital to the lifeblood of the village. Properties along Sizewell Gap Road and Lovers Lane are directly adversely affected now by the additional traffic levels during outage periods and this can only become worse as project traffic levels increase.

   The 6 Halfway Cottage properties face directly onto Sizewell Gap Road and will have Hall Road One (ID1)[1] and CCS to the East, Haul Road Two (ID2) to the West and the cable corridor to the South, effectively surrounding these properties with continual noise, vibration, light pollution, and resultant decrease in air quality, especially as the traffic increase will be mainly HGV related. These properties are on a long sweeping bend and access and egress is difficult especially during high traffic flows, (start and end of the working day). There is a history of accidents and near misses at this location. At no time has the applicant made any efforts to contact residents of these properties to a) understand their concerns and b) offer any form of mitigation or acceptable traffic safety plan. If these projects run sequentially rather than consecutively the quality of life for residents at these properties will be immeasurable; even 4 years is too long.

Agenda item 3 Strategic siting – approach

We are concerned that the applicant was obliged to initiate the CION process following a connection offer in the Leiston area. The question of WHY Leiston was chosen as the site of a huge substation that will become the focal point on many subsequent offshore in inter-continent connections has not been addressed by National Grid Energy Transmission. Where are the results of their CION

[1] 6.1.6 EA2 Environmental Statement Chapter 06 Project Description: Section 6.7.3.3.1 Table 6.25

process? The terms Efficient, Economic and Cost Efficient occur many times in the CION guidance but topics like Benefit to Communities, Environment Preservation or Visual impact are deemed not worthy of consideration. The failure NGET to engage with any interested parties shows a complete lack of respect to those communities and stakeholders affected by proposals for massive industrialisation within a valued rural setting.

Agenda item 4 Local siting – impacts and mitigation

We are very concerned that the applicant do not plan to have survey work reports of the landfall area before Q3 2021 and after the conclusion of proceedings by this Examining Authority. Claims of supply chain uncertainty appears a rather weak argument. Many local residents have expressed concerns numerous times at consultation events about the fragility of Thorpeness Cliffs and the presence of coralline crag. The presence of coralline crag offshore has been identified and measures taken to avoid this area during the offshore cable run. But why are no surveys being performed onshore? The applicant must be very confident that ground conditions are congruent to their planned HDD technique.

There are three possible outcomes for future surveys:

1. Survey results show HDD technique have no damaging lasting impact on the cliffs and work may proceed.
2. Survey results show HDD technique will have a damaging impact on the cliffs and work is halted pending an alternative connection solution.
3. As 2 above but works proceeds as damage is classified acceptable risk.

We find it astounding that a fundamental part of these two projects is not adequately scoped and verified prior to DCO submission ensuring project is viability.

The applicant confirmed deep-rooting trees can be planted outside a 6 metre boundary of the cable trenches, and also the trench configuration will not impact later works by National Grid Ventures interconnectors. Whilst we welcome the re-instatement of any removed trees and shrubs, we are concerned the planting does not impede or become disturbed by any subsequent project activities. As has been stated in other submissions, the soil type along the cable route is very fine sand and plants and trees take a long time to establish and any future disturbance will slow or severely arrest their growth.

This does not alter our opinion that Thorpeness and Friston are not the most suitable locations for offshore windfarm connections. Brownfield sites must always take preference over greenfield, especially when the ecological importance of the area is taken into account. If major industrial developments can occur in and adjacent to AONB, SSSI, EPA & ESA areas and the sandling heath habitat this is a very sad day for all environmentalists who care for the countryside.