Relevant Representation in Response to Deadline 13

A. Thomas Reg ID 20024089 & 20024090 - [RR-804]

Overview of Conduct of the Examination

1. Firstly, I wish to thank the Inspectorate for its efforts in holding an examination in difficult circumstances.

2. For the most part, I felt that the proceedings were fair to Applicant and to those parties opposing the DCO, such as the SASES and SEAS community action groups, whose countervailing arguments were well constructed and concisely delivered. Unhappily, and late in the examination process, it became clear to the residents of Friston and surrounding area, that East Suffolk Council (ESC) were adopting a "neutral" stance toward the proposed development and one which no longer reflected the strongly held and opposing views of the local population. This had been expected as the only financial benefit from the development appears to be Lowestoft area, where ESC is headquartered and SPR has established a commercial presence.

3. The DCO examination process essentially commenced with the publication by the Applicant of a vast body of material extending to about ~35000 pages of text and diagrams, much of it tedious repetition, but still needing scrutiny. The ExA is to be thanked for treating the two separate DCO applications (EA1N and EA2) as a single entity thereby avoiding unnecessary duplication of effort.

4. I do feel however that in extending the hearing by 3 months, an advantage has been handed to the Applicant in that the whole process is highly asymmetric as local residents do not enjoy the same technical and financial resources as the Applicant. 'Late-in-the-day' revisions by the Applicant to the various "Outline Management Plans", Flood Risk mitigation proposals and Noise Emissions resulted in considerable additional work load and costs to local residents.

Overview of the Proposed Development

5. From the outset of the planning application process, the major concerns expressed by myself and many other were, and remain:

- Site Selection
- Permanent Impact on local landscape amenity
- Impact of site construction traffic
- Impact of substation Operational Noise and Light Pollution at Friston
- Increased risk of flooding in Friston
- Cumulative impact arising from other proposed infrastructure programmes in this area
- Lack of any lasting positive legacy

Site Selection – ISH 16

6. The Red/Amber/Green (RAG) down-selection process adopted by the Applicant at the outset to convince local residents that the site selection was rational, merely compounded a growing disbelief by residents. The RAG process was amateurish, mathematically inept in that it numerically convolved 'attribute' (ie non-measurable factors) and 'parameter' (measurable factors), and failed to apply weighting factors to gauge correctly the relative merits of an entry. It failed completely to include pluvial flood risk as a factor. The Applicant countered criticism of the RAG by stating that it

formed only a minor part of the site selection rationale, and that all would become clear during the planning application. Sadly, no coherent explanation was presented at either ISH 2 or ISH 16.

7. The Applicant failed to provide a convincing explanation of why:

- the delivery of 3.6 GW over the Bawdsey to Bramford link has not been pursued in line with the original planning applications made almost a decade ago: there being adequate space and no need for a new National Grid Substation
- The delivery of 1.2 GW (EA1) power using dc transmission was replaced by a reduced installed capacity of 714 MW using 3-phase ac, thus necessitating a complete revision of the substation infrastructure, demand for a completely new substation at Friston and compromise of the 35 km delivery cable trench, all this under the guise of a "non-material change" to the original DCO.

8. At this point it is worth noting that the combined power delivery of EA1, EA1(N), EA2 & EA3 is envisaged as 3.614 GW, which with minor adjustment would be within that proposed for the original Bawdsey to Bramford link. Given that the twin OHTL at Friston is directly linked to the NG substation at Bramford, (there being no intermediate voltage transformation), the siting of new substations at Friston is thus a commercial "convenience" rather than a "necessity" on the part of the Applicant.

9. It has become clear that the only coherent reason cited for the build of the EA1N & EA2 substations at Friston is that National Grid ESO had, using the opaque reasoning within the Connections Infrastructure Options Note (CION) process, offered a connection to the 400kV OTL. The ExA is invited to secure a copy of a document[1] entitled '*National Grid | Planning for 40 GW by 2030 |How to meet the challenge'*. This document, produced by well-regarded consultants, highlights the shortcomings of the CION process and how that process fails to consider properly the environmental impact of decisions made. It is noted (see page 6 ibid that EA1N and EA2 is not mentioned explicitly, but " …a new substation at Friston" is. There is also reference to a proposed new offshore HVDC between Suffolk and Kent with a time frame of 2029.

Permanent Impact on Local Landscape Amenity [ISH 16]

10. The build of 3 electrical substations comprising an area of ~11.5 hA, (more if the permanent access road is included), is inescapably the siting of an industrial development in a rural environment. By no stretch of imagination could this ever be "mitigated" within the lifetime of most local residents, by the planting of trees and hedgerows. It will remain for ever a blight upon the landscape, despoiling views across open fields of the mediaeval village church in Friston, hitherto unchanged for centuries. The development will rupture the existing network of footpaths that connect outlying houses and listed farm buildings with the village proper, and deprive residents of a cherished amenity.

Impact of Site Construction Traffic (ISH 2, ISH 4 & ISH 13)

11. The subject of Construction Traffic and likely impact upon the lives of local residents was addressed in several of the Issue Specific Hearings. In none of these did the Applicant acknowledge the concerns of local residents, preferring to cite bland assurances contained within Outline Traffic Management Plans and similar documents. It was particularly evident in ISH13 that the Applicant had no proper comprehension of the "fear factor" can be induced by up to 300 daily movements of HGVs along narrow roads and difficult road junctions.

[1] *National Grid Planning for 40 GW by 2030 How to meet "the challenge"* prepared by Quod – 15 March 2021

12. With the Applicant now engaged upon "Pre-construction Works, local residents have direct experience of the impact of earth moving machinery employed by SPR: the concept of "mitigation" in the form of increased signage is risible! The true effect of placing large numbers of 'temporary 'Works Access' and speed restriction signs close to the road margins, would appear to many to exacerbate rather than mitigate collision hazards as the photographs below illustrate.

Figures 1(a) & 1(b) - Showing ill-considered siting of warnings

13. The Applicant has failed to reveal adequately the level of vehicular traffic along the haul road during the construction phase and the extent to which local road users may find their journeys disrupted by crossing and turning HGVs.

14. In the immediate area of Friston and the proposed cable route, farm vehicles do give rise to minor 'dust storms' during dry weather, owing to the friability of the local topsoil. However, farm vehicles do not operate 12 hours per day for 6 days per week over perhaps a 3 year period as envisaged by the Applicant. As regards noise, dust particles and pollutants, the haul road will pass in relatively close proximity to residential properties, a nursing home and a school all of which may be adversely impacted. The Applicant has not shown a proper understanding of the likely impact of these factors.

Impact of Substation Operational Noise and Light Pollution at Friston

Light Pollution

15. In addition to the despoiling of the visual landscape by this development, the potential noise and light pollution that may exist for the next 30-40 years remains an abiding concern to local residents, which for most, means the rest of their natural lives!

16. The operational noise environment was addressed at ISH 16 but no ISH addressed specifically the issue of light pollution and little evidence has been presented by the Applicant regarding the means of avoidance. The Applicant has intimated that lighting will only be used during routine maintenance or emergency, but has failed to provide any indication of how frequent this might occur. Of deep concern is the use of security lighting triggered by motion sensors which has the potential to disturb seriously the dark skies environment that Friston currently enjoys and interfere with sleep patterns.

17. No assurances have been forthcoming from the Applicant regarding "temporary" high level illumination of the construction compounds to aid site security. It may be that this matter is addressed, albeit obliquely, in the DCO, but it would be grossly unfair of the Applicant to assuage its concerns over theft and vandalism by bathing Friston and the surrounding area in unwanted artificial light. A condition of the DCO should restrict illumination levels outside working hours to that of the

full moon in the UK, ie 0.1 to 0.2 lux and compel the Applicant to make full use of low-light vision systems.

Operational Noise

18. During ISH 16, it is my recollection that the Examiner requested subject matter experts for the Applicant, SASES and ESC to convene a meeting to resolve issues of a technical nature surrounding the correct approach to establishing an agreed baseline for background noise levels measurements in Friston. To date, I have seen no evidence that such a meeting has taken place or that limiting noise levels and frequency spectra have been agreed, and I urge the Inspectorate clarify the situation.

19. Irrespective of the background noise levels, it is my belief that the Applicant should be compelled to employ the best technical practice regarding noise absorbing enclosures for all noise emitting equipment from the outset. Anything less would make the residents "hostages to fortune".

Increased Risk of Flooding in Friston

20. The Applicant failed from the outset to recognise that Friston was prone to pluvial flooding. This information was readily available to the Applicant and could have been accessed by simple research of Defra and house insurers websites: this parameter should have featured strongly in the RAG assessment.

21. During ISH 16 it became clear for all to see how inadequately presented were the Applicant's proposals for flood mitigation in Friston. It was pointed out to the SPR at the initial consultations held in Friston Village Hall, that the proposed site is elevated at 8-10 metres above the village and that the subsoil in the development area includes numerous pockets of clay. Simple arithmetic indicates that 50 mm rainfall over a compacted surface of 11.5 hA would result in several thousand tonnes of water needing to be vented in perhaps as little as an hour. It is reprehensible of the Applicant not to have properly assessed the flood risks associated with their proposed development ***before*** engaging with the DCO application. Recent infiltration tests merely confirm what villagers have known for years! Below is an image of an exploratory archaeological survey trench following recent rainfall, and from which the ExA may draw its own conclusions.

Figure 2 – Showing partial view across proposed EA1N substation site

Cumulative Impacts

22. Throughout the hearings local residents and community action groups have registered their concerns that the proposed National Grid substation was not being subjected to a detailed and totally separate scrutiny by the ExA. I feel that the stance taken by NGET not to appear before the ExA at ISH 16 (see email of 20 May 2021 from BCLP Legal 2026502.000310) was disrespectful and undermined what should have been a reasoned explanation to all participants in the process.

23. It would appear that the current proposal for an Air Insulated Switchgear (AIS) system occupies an area much larger than is necessary for EA1N and EA2 alone and looks at first sight to be designed to service the needs of the proposed 'Nautilus' and 'Euroconnector' trans-North Sea submarine cable links to Belgium and The Netherlands. Responses by the Applicant regarding possible design changes to a Gas Insulated Switchgear at ISH 16 were weak and unconvincing. This contrasts dramatically with the level of detail attached to positioning of road signs as given in the Outline Access Management Plans!

24. The local population is now being approached to respond to the Sizewell C Nuclear Power Station DCO. This combined with the impending arrival of DCOs for Nautilus and Eurolink viewed will present the local population with a totally unfair cumulative workload in formulating a cogent response, and is viewed with growing dismay. The EA1N and EA2 DCO should include a provision that excludes the developer from allowing any part of the National Grid substation and associated cable sealing ends, from being used for further energy developments.

Legacy

25. When complete, the substations will be unmanned, thus the development as a whole fails to provide any lasting legacy to the local area by way of employment or amenity.

26. The local area does not have large reserves of labour available for construction and it is clear from SPR documentation that the construction work force required will be drawn from a wide area, nominally within a 45 minute drive time. Any "poaching" of labour to make up a shortfall will result in adverse impact upon local industry which is mostly focussed on holiday destination and hospitality.