

## **Deadline 2 East Anglia One (N) and East Anglia Two**

**Response of Fiona Cramb, [REDACTED] 17<sup>th</sup> November 2020**

1. Given the very limited amount of time given to us to respond to the material that has been submitted I have concentrated upon those points of greatest impact to my personal position.
2. I strongly support however the responses prepared by SASES, SEAS and SEAC amongst others.

### **Cumulative impact**

3. My principal point relates to the issue of cumulative impact which, of course, is fundamental to an analysis of the adverse effect upon [REDACTED] and its inhabitants.
4. SPR has stated that it has prepared its application (para 86 of Chapter 6 of the ES) only upon the basis of information in the public domain and it has therefore excluded from consideration any other projects that will affect the Friston site altogether. It says that this is based upon Planning Advice Note 17.
5. There are two points to make.
6. First, there is clear and extensive evidence about projects in the public domain which demonstrate that the cumulative impact will be vastly in excess of anything that the application addresses. For instance, as long ago as March 2020 National Grid Ventures wrote, on behalf of National Grid Interconnector Holdings Limited, to PINS (9<sup>th</sup> March 2020 Alicia Dawson to PINS) indicating that they accepted that there would be a need to future proof the substation for future development. It was stated that the Nautlius and Eurolink Interconnector projects would result in the NGET substation needing to be “extended”. In addition, SEAS has provided a list of 8 projects in addition to Sizewell C which have already been referred to in the public domain. The silence by SPR (and indeed its continued refusal to engage at all on this subject) is deafening.
7. Secondly, in any event, the idea that an applicant, such as SPR, can avoid addressing cumulative impact upon the spurious basis that information is not in the public domain is wrong in law and irrational. The Advice Note cannot be used as a smoke screen for applicants to distort the decision-making process by concealing information. The duty on the ExA is to examine cumulative impact. If SPR was correct, then information that it (manifestly) has in its possession could be withheld from public dissemination with the strategic aim and object of precluding the ExA from considering it. SPR's answers and their persistent refusal to provide this information must be seen in this light. It is frankly inconceivable that SPR does not, within its organisation, have all the relevant information. Since National Grid Ventures have for a long time accepted that there will be additional connections at Friston, then it is common sense to infer that National Grid and SPR will have been in discussion about this over many months if not years, and there will be a wealth of internal documentation which records and demonstrates this. SPR's absurd claim that it can ignore what it knows and frame its entire application around such information

that has (unfortunately for it) been leaked or divulged into the public domain would not stand up in a court of law

8. The legal duty, however, under the relevant EU and UK legislation upon the ExA to consider cumulative impact and this means that it is the obligation of the ExA to obtain all the relevant information and evidence. As matters stand it is unclear that the ExA has in fact demanded that SPR and NG disclose their internal evidence on this. Others will no doubt address the law in more detail.
9. If SPR refuses to supply the information, or if it persists in its refusal to face facts, then its application is defective. It is incomplete and it fails to place the ExA in a position where it can fairly and lawfully evaluate the application. It must be rejected.
10. From my perspective this is critical. SPR's case on impact and upon mitigation proceeds upon a false basis, namely that there is but one project being constructed at Friston. In fact, many projects are planned and this will affect the amount of land needed, the duration of works, the consequential disruption and harm, and the final impact.
11. PINS will no doubt recall that SPR has cynically drawn the boundary of its site to exclude [REDACTED] and other dwellings which abut the construction site. This means that they do not have to compulsorily purchase them.
12. The construction works of SPR and National Grid will come right up our garden fence. The final structures will dominate our immediate view. Indeed because of the cumulative nature of the projects the final structures (plural) will proliferate and become ever more overwhelming
13. It is no coincidence that National Grid has indicated that it will not attend the next round of hearings. By going AWOL it can avoid having to answer embarrassing questions.

### **Site selection**

14. My second point concerns site selection. NG has chosen not to offer connections to SPR at other substations where connections could be made. NG is therefore responsible for site selection and it is the anterior decision of that results in the choice of Friston. This is plainly a choice of site that SPR and NG discussed and agreed upon.
15. It must surely follow that since NG has, in every real sense, chosen this site it has determined that Friston will be its hub and spoke for future connections.
16. This is another reason why the ExA should be forcing NG to engage in an open, fair and transparent way **now**.