

WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 9)



Interested Party: Paul Carlaw

PINS Refs: 2002365 & 2002366

Date: 14th April 2021

Issue: 1

Dear Mr Smith,

I listened with great interest to all of the online hearings on live stream not missing any of the events from the start of the preliminary meetings to the end of the original timetable i.e., up to ISH15 on 19th March 2021.

I would like to express my concern and disappointment that the ExA has made a unilateral decision to extend these examinations following a request to the Secretary of State without consulting Interested Parties (IP's) and this is a procedural decision. I would have expected the ExA to have discussed this proposal with all IP's and to have asked IP's whether they required more time. IP's were unaware of the ExA's request to the Secretary of State until we received your notification on 1st April a matter of days before the formal end of the examination – all IP's did their very best to meet the timescales set out. Until this point in the proceedings I would have congratulated the Planning Inspectorate for the way it had managed the process which appeared to be fair and unbiased until it was discovered the hearings were to be extended. However, this unprecedented decision to extend the examination is disappointing at such a very late stage of the process. This decision would seem to be very much in favour of the Applicant to extend the hearings at this stage as it will only give more time to the Applicant to try and make up for its short comings to date. The Applicant has unlimited financial and human resources to attend further events - this decision at the end of the hearings impacts severely on IP's funding and resources, making IP's disadvantaged only one working day before the end of the formal process. As far as I am aware none of the parties requested an extension to the programme which you clearly stated at the preliminary meeting could not be extended despite the request at the time to delay the proceedings to wait for the BEIS review during the preliminary hearing. I would request the ExA reconsiders its decision to close the examination at the revised deadline 9 date i.e., 15th April allowing the ExA to review its findings and issue its report to the Secretary of State within the timescale set out in the original plan.

I am involved in the Sizewell C hearings and the extension of these hearings will impact on my time and resources available. The ExA may be unaware but many of the IP's who attend EA1N and EA2 hearings are now involved with the preliminary meetings for the Sizewell C project.

I would like to state my dissatisfaction about Issue Specific Hearing ISH13 held on 12th March covering Traffic & Transport where I believe the Applicant was given more time to present its case. I felt this hearing favoured the Applicant and if more in depth questioning by the Planning Inspectorate had been used, a better outcome may have been achieved. Apart from this occasion, I had been satisfied with the online hearing process until I was informed about the proposed extension to the examinations.

A number of interested parties were rushed at ISH 13 and told to be quick as it was Friday afternoon when IP's had spent a considerable amount of time preparing their submissions, waiting for many hours to make their presentations but were not given the appropriate time at such a late stage in the examination for what had been a well-managed process over many months.

I had anticipated at the end of deadline 8 that the Planning Inspectorate would have heard sufficient evidence to make an informed recommendation to the Secretary of State without giving the Applicant more time to see if it can improve its application based on a significant number of omissions and lack of due diligence at the point the Applicant submitted its original draft application. There still remain many outstanding unmitigated issues which have not changed substantially throughout the examination. The Applicant's late submissions and lack of due diligence throughout the examination should not be rewarded by extending the examination for three months.

I wish to support the points raised and evidence presented at the various Issue Specific Hearings opposing the onshore elements of these projects and I support the views of Suffolk County Council, SASES, SEAS, Aldeburgh Town Council, Save Our Sandlings, the points of disagreement raised by East Suffolk Council, the points raised by Friston Parish Council, Snape Parish Council and comments made by Dr Therese Coffey and in writing at deadline 8.

The onshore project works should be rejected based on the following headings where the Applicant has not provided satisfactory responses, often very late or not responding, pushing everything out to the last minute due to the lack of pre-planning or waiting too long to submit new documents and amendments.

Cumulative impact – the Applicant has not addressed IP's concerns throughout the hearings about cumulative impact. The proposed extension will allow the Applicant more time to try and convince the Planning Inspectorate or relay still more unconvincing arguments that the Friston site is a realistic option when other more appropriate sites have been identified during the examination. In addition to the proposed onshore projects other significant projects have already been identified and the examination process is starting for at least one of these projects, the Nautilus interconnector. There are significant housing developments planned nearby that will have a cumulative impact on traffic and air quality outside of these projects, along with Sizewell C already at the preliminary meeting stage.

The recent successful case at the Court of Appeal which overturned the Vanguard DCO should be taken into account when making a recommendation to the Secretary of State, particularly the onshore elements. The Friston site and onshore cable route planned have a greater impact on this region than some of the other recently approved DCO's. The Heritage Coast is a very special area and must not be destroyed for generations to come as a result of an uncoordinated approach by the Applicant and National Grid. I would respectfully ask that the Planning Inspectorate recommends the onshore elements of the DCO are rejected, taking into account cumulative impact and the forthcoming BEIS review.

Site Selection – I have heard sufficient evidence provided during the various hearings to enable the Planning Inspectorate to recommend these DCO's are not approved for the onshore works.

Health and Social Well Being – we have heard about the significant impacts of these projects on the health of local people, stress, mental health and physical wellbeing at ISH 10 on 9th March and I fully endorse the concerns raised by IP's including SASES, SEAS and their medical experts who attended and submitted their representations. The onshore elements of these projects will have a significant impact on the people of this region, in

particular the people living in the village of Friston, Knodishall, Aldringham and Aldeburgh, impacting those people living in Snape as a result of people taking short cuts to miss out a congested section of the A12, those people affected along the A1094 and other local roads used to access the onshore sites and the construction consolidation sites. Construction personnel using local roads to create rat runs affecting people's anxiety and stress levels.

Flooding - I support the concerns raised by the SASES and the Suffolk County Council regarding the unmitigated impact of flooding discussed at ISH 11 on 10th March, the village of Friston has already suffered a number of flooding events in recent years.

Noise – I listened to the evidence at ISH 12 held on 11th March, but I believe operational noise has not been mitigated and the arguments raised by SASES acoustic consultant should be accepted. I have concerns over the noise from construction traffic and construction site noise over many years along the cable corridor and at the proposed Friston site, the construction consolidation sites and traffic movements in the early hours despite agreement that works will only operate from 0800 – 1800 Monday to Friday and 0800 – 1300 Saturday. I note in the Outline Code of Construction Practice (OCoCP) submitted at deadline 8 that vehicle movements are allowed one hour before and one hour after the scheduled working day. I ask the Planning Inspectorate reviews this clause concerning allowable vehicle movements outside of the agreed working hours as set out in the OCoCP please.

Traffic & Transport – I listened to ISH 13 on 12th March, but I still have major concerns that the small roads, tracks and existing infrastructure is incapable of taking the loads, volume of traffic and HGV's even after the proposed road alterations suggested by the Applicant. This will create danger for local people, cyclists, walkers and tourists. The A1094 from the A12 turnoff at Friday Street and other small village roads are too narrow to take large loads making their way to construction consolidation sites etc impacting on this beautiful and peaceful area. This locality cannot accommodate so many site workers travelling to and from the construction sites every day along with abnormal loads and significant numbers of HGV's.

Socio Economic and Tourism – we heard at great length the genuine concerns and the impact on tourism outlined in the DMO report for the entire region which appeared to be refuted by the Applicant without appropriate counter arguments including impacts on Friston, Benhall, Knodishall, Aldringham, Aldeburgh, Thorpness, the holiday park at Sizewell, the Wardens Trust all impacted particularly those people who are disabled or those who rely on these facilities to improve their health and wellbeing.

Heritage and Landscape – to lose the Pilgrims Way footpath across the substation site, a local amenity for the village and for tourists alike that is 100's of years old must be considered significantly detrimental to the area as well as its loss impacting on the approach and views towards the Grade 2* listed Church of St Mary the Virgin. The visual impact on other Grade 2 listed properties that surround the site and the visual impact from the village green resulting from industrialisation must be key reasons to recommend the onshore works do not proceed. There is no mitigation possible to be set against the environment damage these projects will cause.

Habitats and Environmental Impact – I would like to endorse the points and concerns raised by Natural England and the impact on the Hundred River Crossing, the fragile cliffs impacted by the cable access point, the impact on wildlife habitats, the wetlands, that could be avoided if a more appropriate site had been selected prior to the submission of the draft DCO.

Area of Outstanding Natural Beauty (AONB) – I have listened with interest to the points raised by Natural England which I fully endorse and support. I have significant concerns over the fragility and erosion of the crumbling cliffs where it is proposed to use Horizontal Directional Drilling. These very cliffs have been eroding for years and it is well known about how fragile the landscape is – in recent years at least one fatality has resulted due to fragile cliffs and rocks falling away.

Emissions and Pollution – the cumulative impact of other projects given the promise of connection points at Friston as well as the Sizewell C project which has now entered the preliminary examination stage need to be considered along with the Applicant's DCO. I do not believe we have seen a satisfactory answer to the concerns and questions raised by interested parties concerning NO2 emissions, even with the use of 80 % of Euro V1 diesel vehicles as has been suggested by the Applicant.

Light Pollution – the addition of artificial light controlled by an automatic movement sensor monitoring system will impact on the local community and the dark skies local people and tourists alike have enjoyed for 100's of years. There is virtually no artificial street lighting in the village of Friston – therefore selecting a more appropriate site with better transport links, remote from local communities or using a brownfield site is another reason why the Applicant should consider a more appropriate location or use more appropriate offshore technology i.e., a ring main should be investigated and adopted as an appropriate green energy solution.

I have lived in Friston and Suffolk for over 27 years, moving here because of its rural location, closeness to the sea, its beautiful landscapes, dark skies, it's music at Snape Maltings, its wildlife and having lived and worked in London for many years I have found peace and tranquillity in Suffolk. We need to treasure beautiful landscapes, big skies, dark skies, natural habitats – keep and retain this region as it has been for centuries and preserve it for future generations.

I support green energy and windfarms but do not agree with the proposal to industrialise this region. Please recommend the rejection of the onshore elements of the DCO to the Secretary of State and recommend the Applicant uses a ring main approach or reviews its site selection criteria to use an appropriate onshore location that reduces environmental impact.

In summary, I have over 40 years' experience in private practice, construction working with end user clients in retail, telecommunications and banking. The evidence I have heard and observed provides overwhelming data demonstrating that there is no need to extend the examinations and there is sufficient evidence to make an informed decision as a result of the hearings already available. Please end these examinations at deadline 9 – we have all heard enough why the onshore elements of the DCO should not be allowed to proceed.

Yours sincerely,

**Paul Carlaw BSc(Hons) MRICS
Chartered Surveyor**