



## WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 31 January 2022)

**Interested Party:** Paul Carlaw

**PINS Refs:** 2002365 & 2002366

**Date:** 31st January 2022

**Issue:** 1

Dear Secretary of State,

I have read the comments by the Applicant with interest and I would like to comment on the responses to flood risk. I would also like to comment on other areas that I do not believe have been fully addressed during the examinations, in particular cumulative impact and site selection which relate directly to flood risk.

1. **Flood Risk** – During the initial consultations and prior to the Issue Specific Hearings (ISHs) it was clear the Applicant had never carried out any due diligence or pre-design relating to flood risk. If infiltration testing and design calculations had been carried out at the appropriate time prior to deciding upon the Friston site, I do not believe we would be where we are today as the Applicant should have considered alternative more appropriate sites – more suitable locations were identified during the ISHs. Infiltration testing and site investigations were only instigated after the date the process should have concluded despite (and it was not expected by attendees) that the process would be extended after the Planning Inspectorate made a request for additional time to try and deal with outstanding matters, several issues remain outstanding which have not been satisfactorily addressed.

It was good to see questioning by the Planning Inspectorate at newly arranged ISHs following the extended timetable. The SASES drainage consultant and other Interested Parties (IP's) placed the Applicant under pressure to focus its attention and produce new drawings where the Applicant tried to plug gaps, playing catch up when ponds or SUDS for storing water appeared on its drawings where the Applicant tried to convince IP's that it had dealt with the concerns raised. It's clear even with everything the Applicant has carried out as part of its gap analysis that they had still not convinced IP's that it had a drainage solution to minimise impact on Friston village – all of this has happened because the site selected was inappropriate at the outset – with no due diligence before making a decision about an inappropriate site.

Friston village has suffered various flooding events which seem to be happening more regularly with significant flooding now being all too common. The Applicant has ignored the concerns of IP's and the evidence and reports submitted by SASES flooding expert.

Prime agricultural land in Friston for the proposed substations is fragile, including the fragility of the cliffs at the proposed landing point at Thorpeness – none of this gives any confidence that site selection has been carefully considered. It is important to remember that Dr Therese Coffey MP, who gave evidence during the IPH's identified more appropriate sites along with SASES and other IP's.

The Applicant has continually bluffed its way through the ISHs trying to convince the Planning Inspectorate and other IP's that they had addressed concerns and that the flood risk could be mitigated if the DCO's were allowed to proceed. It did seem to many IP's that the Applicant had opened an Ordinance Survey map and used a pointer to find a piece of land that would meet their requirements despite its location, proximity to the AONB and the damage it would cause seemed to be of little interest to the Applicant. Following the initial consultation meetings and throughout the examination the Applicant has ignored the points raised by specialists stating that their proposals would not cause further flooding – it's clear that there is disagreement by so many parties.

It is agreed green energy is partly the right approach to reduce environmental impact to reduce global warming but the Applicant is putting profit before what is best for the environment.

2. **Cumulative impact – Flood Risk** – the Applicant has not addressed IP's concerns throughout the hearings about cumulative impact and additional flood risk. The projects likely to follow the approval of EA1N and EA2 have not been fully considered using a cumulative impact assessment if these DCO's are allowed to proceed with some examples of projects that are likely to follow including Nautilus (already being planned), North Falls, Five Estuaries, Euro link, SCD1/Sea link along with the potential impact of The Sizewell C Project. The cumulative impact of additional projects that may follow will compound the flood risk to Friston – this has not been addressed despite a three month extension to the original timetable.

The recent case decided at Judicial Review which overturned the Vanguard DCO must be considered when making a final decision, particularly the onshore elements of these projects. The Friston site as proposed and onshore cable route planned have significantly greater impact on this region than some of the more recently approved DCO's. The Heritage Coast is a very special area and must not be destroyed for generations to come because of an uncoordinated approach by the Applicant and National Grid. Therefore, the Secretary of State is responsible to review the proposals set out in the draft DCO's and as a minimum decline the onshore elements of these DCO's, considering the lack of due diligence and failure to assess the true cumulative impact of projects that are likely to follow.

The test of reasonableness has been ignored by the Applicant, where they introduced gagging clauses to try and silence the voices of concerned parties where potential compensation was placed in jeopardy as IP's were under pressure to sign Non-Disclosure Agreements. IP's were disallowed from making future representations when they signed NDAs and were asked to withdraw any previous objections or potentially it may have otherwise impacted on compensation proposed if they had refused to sign the NDA in a timely manner. This has compromised the process.

3. **Cumulative Impact - Site Selection** – there was a significant amount of evidence provided by IP's during the various hearings to ask the Secretary of State to decline the DCO's on the grounds of inadequate due diligence and inappropriate site selection. This does not only relate to flooding but also the wildlife impacted by the proposals.

4. **Cumulative Impact - Traffic & Transport** – there were significant concerns raised at the ISH 13 on 12<sup>th</sup> March – there remain concerns the small roads, tracks and existing infrastructure is inadequate to take the loads, volume of traffic and HGVs proposed 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 allow huge vehicles to make their way to construction consolidation sites 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. This again relates to cumulative impact that has not been assessed by the Applicant.
5. **Cumulative Impact - Socio Economic and Tourism** – it was discussed at great length the genuine concerns and impact on tourism outlined in the DMO report for the entire region which was refuted by the Applicant without appropriate counter arguments including the impacts on Friston, Benhall, Knodishall, Aldringham, Aldeburgh, Thorpness, the holiday park at Sizewell, the Wardens Trust. This heading relates to cumulative impact that has not been assessed based on the significant number of projects that will follow and industrialise the region driving away people who have made the region a sought after destination affecting the livelihoods of businesses who rely on tourism.
6. **Cumulative Impact - Heritage and Landscape** – to lose the Pilgrims Way footpath across the substation site, a local amenity for the village and tourists which is hundreds 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. The cumulative impact of any projects that will follow e.g., Nautilus have not been assessed by the Applicant.

In summary, please consider the points raised above relating to these environmentally damaging DCO projects and request the Applicant to find and design a more appropriate sympathetic onshore solution using a brownfield site or consider the use of an offshore ring main to bring power ashore where it is needed.

Yours sincerely,

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