SPR EA1N and EA2 PROJECTS

DEADLINE 5 – POST HEARING SUBMISSIONS (ISH4)

Interested Party: SASES **IP Reference Nos.** 20024106 and 20024110

Date: 3 February 2020 **Issue:** 1

INTRODUCTION

These submissions are made following Issue Specific Hearing 4 which took place on Tuesday, 19 January 2021 and Wednesday, 20 January 2021.

AGENDA ITEM 2 - ENERGY WHITE PAPER: POWERING OUR NET ZERO FUTURE

Please see BEIS OTNR Pathfinder Clarification Note submitted at Deadline 5.

AGENDA ITEM 4 – ONSHORE CONSTRUCTION AND OPERATIONAL EFFECTS

4(b) – NOISE

1. SASES called Rupert Thornely-Taylor to give evidence on noise matters. Mr Thornely-Taylor is an acoustician and expert witness with 52 years experience in the field. He has given evidence at the examinations into the Tilbury 2, Thames Tideway Tunnel and Silvertown Tunnel DCOs, and on behalf of the Secretary of State in the HS2 Bill Select Committees. He acted as expert witness in the inquiry into the North-South Interconnector in Northern Ireland.

2. Mr Thornely-Taylor explained that Friston is a very quiet area indeed, and there is only one area in England where he has measured lower noise levels. The quiet noise environment is itself an important environmental resource.

3. Policy (EN-1, 5.11.9) requires that development consent is not given unless proposals avoid significant adverse effects on health and quality of life. It is necessary to mitigate and minimise other adverse effects on health and quality of life. “Avoid” means “do not let happen”.

4. With regards to the requirements of EN-1 the applicants use BS4142 which gives guidance on working out whether there are adverse effects. The assessment under BS4142 is based on the difference between rating level (which is the physical sound level plus corrections for things like tonal character) and the background noise level. BS4142 says that a difference of +5dB is likely to be an indication of an adverse impact, depending on the context and that a difference of around 10dB is likely to be an indication of significant adverse impact.

5. BS4142 indicates that in taking into account context, the assessment should (amongst other things) consider:

> *"The character and level of the residual sound compared to the character and level of the specific sound. Consider whether it would be beneficial to compare the frequency spectrum and temporal variation of the specific sound with that of the ambient or residual sound to assess the degree to which the specific sound source is likely to be distinguishable and will represent an incongruous sound by comparison to the acoustic environment that would occur in the absence of the specific sound."* (section 11(2))

6. As noted above, the receiving acoustic environment is exceptionally quiet.

7. Even applying the +5dB threshold, EN-1 requires the applicant to take steps to mitigate and minimise the noise, beyond restricting the rating level to no more than +5dB above background.

8. The applicants predict noise levels that are lower than the DCO requirement. However, that is only because the applicants are not taking into account the likely presence of tonal characteristics in the noise, which add up to 6dB to the predictions. They have not considered the uncertainty and likely variation in the predictions.

9. The applicants say that tonality will be considered as part of the design process, but it is well established that noise from transformers and associated equipment is dominated by the second harmonic of the line frequency that is a pure tone of 100 hertz. There is a further a special feature about this scheme, which is that there will be two substations relatively close together with similar equipment. That brings to the fore a phenomenon referred to in BS4142 which indicates that it is necessary to establish whether there are standing waves or interference patterns. Where two similar tonal sources are heard together at the receptor, the combined level can be 3dB greater than the result obtained in standard noise models.

10. On the evidence before the examination significant adverse effects cannot be excluded. Based on the background level of 18dBA at receptor SSR9, and proposed DCO limit at SSR3, the rating level could be more than 10dBA greater than background, even when the DCO limit is being complied with.

11. The application also includes single figure predictions for each location, with no indication of confidence limits. These figures are of course subject to uncertainty: the correctness of the model; the accuracy of the manufacturers source data; effective atmospheric conditions; the interference effects described above; and errors on the part of the operator the model. There is no validation against existing comparable sites.

12. Atmospheric conditions are extremely important because the predictions used here include large amounts of excess attenuation due to the presence of a soft ground. But t in frequently occurring weather conditions, such as temperature inversions and wind from source to receiver, those excess attenuation figures will not arise. Accordingly there will be many occasions when sound levels are materially higher than the central single figures that have been predicted.

13. The applicants argue that the only thing that really matters is achievement the DCO requirement limits. However, these limits apply on all days including those when there are atmospheric conditions favourable to noise propagation from source to receiver. The noise limits are therefore likely to be exceeded. Applying retrospective mitigation measures will

be extremely demanding and challenging from a technical point of view, as well as time consuming. It is therefore vital that the applicants really do face up to the need for much more accurate predictions of what noise levels will be.

14. The DCO requirement might also be interpreted to mean that the monitoring scheme only applies on two occasions: after initial commencement, and six months after.

15. The following further steps are required:

    a. The correct background noise levels should be used, and the applicants' own analysis indicates it should be a lower figure than those assumed even in the revised submission (see further the submission in response to the applicants' D4 submissions);

    b. Predictions should be made including an estimate of uncertainty, with full consideration of tonality, frequently occurring atmospheric conditions and constructive interference;

    c. It needs to be properly established that the amount of mitigation necessary is practically achievable.

16. On construction noise assessment, the approach completely out of line with modern practice in major projects. The assessment criteria are based on a misapplication of British Standard 5228 and modern practice, which is highlighted by recently issued guidance from Highways England which is threshold of *significant observed adverse effect level* at the point where the applicants place the boundary between "no impact" and "negligible impact". The applicants have got this wrong. The lowest observed adverse effect level should be set at background level in accordance with Highways England's approach.

17. This is critical because exceedances of significant observed adverse effect level have to be avoided. The provision of noise insulation as a means of avoidance is not very appropriate for rural areas. This is the first major project that Mr Thornely-Taylor has come across in recent times where there is no provision for the enforcement of a requirement to employ the best practical means to reduce noise. In other words, it's normal for a major project to require in the CoCP that the contractor applies for prior consent under Section 61 Control of Pollution Act. In the absence of that, enforcing a failure to follow the CoCP be a long drawn out process, possibly necessitating proceedings.

18. By way of closing legal submissions, it was noted that the examining authority cannot be confident that the mitigation measures relied upon can in fact be relied upon to deliver the mitigation required. That has important legal consequences, not least because of well-established principles of EIA law. The failure to set an appropriate noise limit could lead to serious and profound enforcement issues. The examining authority should be satisfied that the DCO requirements are capable of being complied with; and the expert evidence of SASES is clear that the ExA cannot be confident of that.

4(d) – FLOOD RISK AND DRAINAGE

1. SASES called Clive Carpenter to give evidence. His qualifications are BSc, MSc and Chartered Hydrogeologist & Water & Environmental Manager. He has more than 30 years' experience in water resources, flood risk and drainage and, amongst other projects, is

currently the Lead Advisor-Designer on an 85km length of construction phase storm water run-off assessment & drainage design of HS2 Railway, covering >40km2 of construction site, > 500 attenuation ponds and >300 discharge treatment units and outfalls.

2. Friston is highly susceptible to storm water run-off flooding and it is established that storm run-off from the proposed sub-station site areas will flow directly into Friston Village. The hardstanding at the substations will increase storm water run-off peak and total flows into Friston compared to the baseline, increasing flood risk. The construction phase removal of vegetation and soils will also increase peak and total flows along with sediment deposition.

3. Because of the existing constrictions to the flows that pass through the village, it is necessary to consider not only the peak flows, but also the total flows that leave the development site which also need to be maintained at pre-development levels to avoid flood risk. The failure by the applicant to assess total flows is a failure to identify, assess and mitigate flood risk. The need to address total flows is confirmed in EA strategies, SCC's flood risk management strategy, and paragraph 5.7.22 of EN-1.

4. The applicant's characterisation of flood risk is weak. It is necessary to follow a source-pathway-receptor approach. The applicant states that the greenfield run-off rate, which is the rate that is being sought to be achieved, will be confirmed during detailed design. This is inadequate because without confirming those flows it is not possible to design the development to achieve the objective of limiting flows to pre-development levels.

5. The pathway, which is the route from the site to the village in this case, has not been assessed in any detail by the applicant. The applicant has failed to identify that soil erosion will potentially increase and that the mobilisation of that soil and its transposition to and deposition in the drainage network forms part of the increased flood risk within the village.

6. The applicant has also failed to give specific consideration to the receptors within the village, for example residential properties, and whether there are specific needs of particular residents. Instead, they have chosen to argue that because they say they can mitigate the flood hazard, they do not need to assess individual receptors. This is not a reasonable approach to flood risk assessment.

7. As to scheme design, the applicant has failed to demonstrate that there is a viable infiltration solution for operational surface water management. The infiltration rate of 10mm/hour is used to assess whether it is possible to get water into the ground at all: it is an assumption. The applicant has in fact failed to demonstrate that an infiltration rate as high as 10mm/hr actually exists on site. Infiltration rates in the natural environment can vary by more than six orders of magnitude. This leads to consideration of the factor of safety (FOS). The sensitivity analysis by the applicant is inadequate. It should use a FOS of 10 (as is used on the outputs of the model) for the inputs from the source. Accordingly, without using an appropriate FOS and without undertaking infiltration testing, there is a significant constraint on the confidence to the sizing of the storage volumes required to provide storage for infiltration or for discharge to the watercourse.

8. All of that limited analysis and design relates to the operational phase. There is no detail of how the sizing and design of the construction phase of the project will be undertaken. The construction working area is considerably larger, perhaps 2 to 3 times larger than the operational phase. Stripping of soil and vegetation will increase run-off and turbidity. The

issue with turbidity is significant because turbidity will prevent infiltration and will also prevent the water from being released from the site, because the EA will impose strict turbidity limits. Removal of this turbidity requires treatment which requires longer extended periods for the water to be retained on site. The viability of a construction surface water management design is entirely unproven.

9. Such a scheme design will have to work for both peak and total flows and across a range of design periods. The scheme design will have to work for the 1:100 year flood event, but also for the 1:30 and 1:1 year event. The applicant does identify the "Qbar" flow (1 in 2 year return period) which will be released from the attenuation lagoons, but there are no details on the scheme required to enable that discharge to be achieved. There are no details of infiltration rate, floor area, volume, inflow design storm(s), FOS, emptying times etc.

10. The applicant's calculations show the required storage volume in the operational ponds exceeds the design volume by 50% and relies on "freeboard" and landscaping to provide the reported required volume to prevent over-topping. [The freeboard is the additional volume beyond that required for the design storm and is required to allow for other uncertainties (e.g. wave action due to high winds etc).I must not be used to accommodate the design flood itself.] The applicant's methodology is an unacceptable approach.

11. The attenuation ponds are above ground level on their downslope sides, meaning tens of thousands of cubic metres of water could be released into Friston if there is an uncontrolled overtopping and/or failure of the pond bunds. No reservoir inundation modelling has been undertaken, and no consideration has been given of the consequences of such a failure.

12. The most recent submissions at Deadline 4 (Outline Operational Drainage Management Plan and Outline Code of Construction Practice) contain insufficient detail or analysis to demonstrate that: flood risk has been adequately assessed; that the surface water schemes are viable; and that they will achieve adequate flood risk mitigation.

AGENDA ITEM 5 – ONSHORE TRAFFIC AND TRANSPORT

Friday Street Junction

1. The Friday Street junction and Snape crossroads are accident black spots. This is recognised in the ES (Chapter 26) and if you look at figure 26.6 this shows Friday Street as collision cluster 3 and Snape crossroads as collision cluster 4.

   https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001384-6.2.26.6%20EA1N%20ES%20Figure%2026.6%20Collision%20Cluster%20Locations.pdf

2. The Friday Street junction is a key junction as the A1094 is the artery for the coastal area of East Suffolk. It feeds the town of Aldeburgh and the villages en route but is also the access for Snape Maltings which aside from its concert hall has developed into a significant retail destination. Furthermore close to Friday Street there is (i) a new development currently in the course of construction which includes a potato processing plant and weighbridge (ii) and a large farm shop/supermarket and café which is currently being expanded.

3. Residents who use the local road network on a daily basis are concerned that mitigation measures being proposed at Friday Street will cause congestion on the A12. If there is congestion south of Friday Street, traffic will take to the country lanes to the east of the A12 and end up joining the B1069 which runs by and is the access to Snape Maltings as well as being the main route through Snape. This traffic will then join the A1094 at Snape crossroads which is a difficult junction to navigate as evidenced by the fact that it is an accident black spot. In this context although cluster 3 is identified as an accident black spot it is not considered to be an issue with congestion – see figure 26.7 of the ES. This is contrary to local residents experience.

   https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001385-6.2.26.7%20EA1N%20ES%20Figure%2026.7%20Sensitive%20Driver%20Delay%20Locations.pdf

4. Into this mix has to be added the additional traffic which will result from the Sizewell C project and EDF's plans to construct a four arm roundabout at Friday Street, the fourth arm being necessary to join a new bypass which is to be constructed around the villages of Stratford and Farnham to the east or Friday Street.

5. There are concerns as whether the assessments are complete and correct for example:

   a) It would appear that the conclusions are based on traffic flow data collected on a single day namely Wednesday, 5th June 2019 - see paragraph 2.6.3 of the Royal Haskoning July 2020 report. Is it really satisfactory to rely upon a single day's data? What about data in the peak of the holiday season in July and August when there are many events and festivals taking place in East Suffolk not least Latitude and at Snape Maltings.

   b) No account has been taken of the new development on the A1094 near Friday Street or of the increasing popularity or the Friday Street farm shop/retail/food destination.

   c) Snape crossroads is not considered by the ES to be a problem in respect of congestion, this is not residents' experience not least given this is the access to Snape Maltings.

   d) The potential displacement of traffic onto the rural lane network joining the A12 to the B1069 does not appear to have been considered and the consequent road safety and congestion issues.

6. It is curious that a roundabout solution was rejected as a mitigation measure for the Scottish Power projects because it caused delay to the travelling public (see paragraph 4.1.5 of the Royal Haskoning report dated 28 January 2020) and yet it is considered to be appropriate for Sizewell C in combination with the Scottish Power projects.

7. In the Transport and Traffic Clarification Note there are references to the interaction with Sizewell C and at paragraph 8 it is stated that:

   "the SZC roundabout would provide a modern standard compliant solution at the Friday Street junction and would therefore be appropriate to mitigate the cumulative impact of the traffic generated by both the projects and SZC in the event that these projects are constructed at the same time"

8. The clarification note refers back to the Sizewell Projects CIA (Traffic and Transport) which was submitted by the Applicants at Deadline 2 and therefore prior to the traffic signal proposal subsequently agreed with SCC.

9. In section 2.4 of the CIA on page 14, which addresses Road Safety, collision cluster 4 is not mentioned and at section 2.4.4 the A1094 (on which the Snape crossroads is a major junction) collisions are stated to be "just below the national average for comparable roads". The Applicants have also caused confusion because in the ES table 26.33 on page 103 Chapter 26 includes what is known as link 6 in cluster 3. As can be seen from figure 26.5, link 6 is the A1094 from Friday Street junction to the junction with the B1121 and is divided into three sections 6a, 6b and 6c, where 6b is the Snape crossroads and is identified as being of high sensitivity. This omission/confusion casts doubt on the conclusions of the Sizewell Projects CIA made in respect of road safety.

10. There is also the obvious question of the timing of when the SZC four arm roundabout is to be constructed at Friday Street and how that might affect congestion and safety. The Sizewell Projects CIA blithely states at paragraph 72 that

    "the SZC application confirms that it would be intended that the roundabout would be delivered off-line meaning that the existing Friday Street junction would be largely unaffected during construction"

    What does "largely unaffected" mean?

11. Paragraph 17 then states

    *"the provision of a roundabout would provide a modern standard compliant solution at this location and would therefore be appropriate to mitigate****……(once the roundabout is complete and open)*** [emphasis added]

    but presumably not before.

12. Paragraph 86 states

    "with regards to the potential for cumulative impact during the six-month period when the roundabout is being constructed (as advised within the SZC ES), the SZC assessment does not include consideration of this scenario, and no temporary mitigation is proposed"

13. These inconsistent and oddly contradictory statements cause one to question:

    a) what will really happen at Friday Street when EDF are constructing a four arm roundabout whilst the Applicants' projects are being constructed; and

    b) what the consequences will be for (i) congestion on the A12 and at the Snape crossroads and (ii) for safety on rural lanes and at the Snape crossroads.

14. Finally of course there is the ongoing issue of the other proposed offshore energy projects and what that will mean for traffic at this junction and the consequent knock on effects.

<u>HGV movements at site resulting from new proposals on finished ground levels</u>

15. Scottish Power is proposing to reduce the finished ground levels of its eastern substation by 2m and of the National Grid substation by 0.7m. SASES is unconvinced as to the calculations that Scottish Power has made in respect of the resulting HGV movements.

This has been commented on in the SASES submission which was made in relation to construction at Deadline 4.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003532-sases%20deadline%204%20bh%20final%20comments%20Applicants%20D3%20submissions%20re%20construction.pdf

Access Point 13

16. Figure 26.2 in the ES shows the locations of the access points.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-001380-6.2.26.2%20EA1N%20ES%20Figure%2026.2%20Access%20Locations%20and%20Associated%20Onshore%20Infrastructure.pdf

17. Access point 13 is the new access road which is to be built as part of the project. It is work number 34 and it is part of both the Scottish Power NSIP and the National Grid NSIP. Originally this was called the "operational" access road but now it is merely the access road.

18. Access Point 13 can only be reached by either driving through Friston Village or through Sternfield. The road through Sternfield is unsuitable for heavy traffic and generally increasing traffic on this road is highly undesirable given it has a single lane humpback bridge and there are residential properties immediately adjacent to the road.

19. SASES has been very concerned as to the use which will be made of this road not least as the Applicants have stated that National Grid construction employees will use this road. That of course begs a number of questions.

    a) Why do National Grid construction workers need to use this road (which will result in further traffic through Friston and more likely given its access to the A12, through Sternfield which is highly undesirable for the reasons stated) when the Applicants' do not?

    b) Is this access road part of the Scottish Power NSIP or the National Grid NSIP? At the moment the DCOs show it as being part of both and it is included in both the definition of the Scottish Power NSIP and the National Grid NSIP.

    c) Why does it need to be 7m widetwhen the tarmaced part of the B1121 accessing it is only 5.1m wide? Although this road will be the means of delivering the four AILs, there is no reason why the road should not be temporary widened for this purpose and then reduced to a width which is only necessary for maintenance which was how this road was initially presented. There are obvious concerns that this road is being designed for the purpose of facilitating the construction/expansion necessary for other projects to connect at the National Grid connection hub.

AGENDA ITEM 6 – PUBLIC RIGHTS OF WAY (PROW)

1. The closure and diversion of Public Rights of Way (PRoWs) in the onshore development area represent an unacceptable and serious loss of amenity to residents and visitors. This is especially true of the permanent closure of Footpath 6 (E-354/006/0) in Friston. The relevant policies from NPS-EN-1 applicable to this issue are:

a) Paragraph 5.10.2 "*The Government's policy is to ensure there is adequate provision of high quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change."*

b) Paragraph 5.10.21 *"The IPC should also consider whether mitigation of any adverse effects on green infrastructure and other forms of open space is adequately provided for by means of any planning obligations… Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality and, where possible, at least as accessible.*

c) Paragraph 5.10.24 "*Rights of way, National Trails and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The [IPC] should expect applicants to take appropriate mitigation measures to address adverse affects on coastal access, National Trails and other rights of way."*

<u>The Substation Site and Footpath 6</u>

2. The Friston site is the only one of the 8 zones considered which involves permanent closure of PRoWs. This should have been given more weight in the RAG Assessment and Site Selection process.

3. The permanent closure of Footpath 6 through the substation site results in the loss of:-

    a. An historic Parish and Hundred boundary, which is also believed to be Pilgrim's Way.

    b. A well-used and attractive circular walk from village (other walks in village are inferior to this)

    c. Links to and from the outlying historic farmhouses and the village.

    d. Views of Grade II* Listed Parish Church over a considerable distance from the north will be obliterated by the substations. This affects the setting of the Listed building. It is to be noted that northern part of village near to the Church is the oldest part of village.

4. The proposed alternative route to Footpath 6 is inferior, and therefore contrary to EN-1, due to:-

    a) The new footpath runs close to the substations and Grove Road, resulting in a loss of tranquillity due to the visual intrusion and noise impact of the substations.

    b) It is a far less direct route than that existing. The draft Development Consent Order gives the length to be stopped up to be 693M with the diverted route to be 1345M. This is an increase of 94% i.e almost twice the distance, which is significant particularly for those accessing the outlying farmhouses. It also makes the current one hour circular walk substantially longer and may deter those who regularly walk their dogs twice a day.

c) The motion sensitive lighting and CCTV system proposed for the substations will be intrusive to walkers on the PRoW.

d) The mitigation planting will be ineffective for many years and parts of the new route will have direct views of the substations in perpetuity due to gaps in the planting.

e) SPR propose hard surfacing on the alternative route instead of the current wide grass paths on Footpath 6. This is inappropriate in a rural area and increases its urbanisation.

5. The use of PRoWs on the substation site during the construction period has not been properly considered or thought through, resulting in a loss of connectivity.

a) The proposed temporary diversions for the substation site shown on REP3-008, Sheet 7, are for the early period of construction only (potentially just for enabling works) as these diversions are in the location of the construction of the SPR substations themselves.

b) The permanent closure of FP6 is required early in construction phase and it is not clear what diversions, if any, are to be provided. The haul road (marked as 88M wide on the Works Plans REP3-006) enters the substation site where the alternative PRoW route is proposed. Where the haul road enters the substation site there is also an area for the marshalling/turning of lorries (See Works Plans Sheet 7 – work No 26 coloured brown, REP3-006)

c) Construction Consolidation Compounds are proposed in same location as the alternative PRoW route, to the north of the haul road (see Indicative Construction Plan APP-101). It is not demonstrated that the proposed alternative PRoW can be established during the construction period.

d) It is not clear that the alternative route can be established prior to the closure of FP6 and, if so, what arrangements would be made to cross the haul road in this constricted and dangerous area. It would seem likely that walkers will be diverted onto Grove Road itself with all its inherent dangers.

e) Ground levels are proposed to be lowered by 2M on the east of the substation site and it is not apparent how this interacts with levels of the new PRoW or Grove Road itself, which would be at a higher level.

f) The Outline Landscape & Ecological Management Strategy (REP3-030/031) paragraph 149 states *"the proposed permanent diversions will be in place prior to the existing PRoW being stopped up. Any temporary diversions to be used during the construction phase will be agreed post-consent with the relevant highway authority".* This is a contradictory statement in that the Applicant is obliged to have the permanent diversion in place before stopping up FP6, but also implies that diversions may be necessary. The Applicant should explain how the PRoW network is to be kept open during construction prior to DCO consent.

g) The Draft Development Consent Order (REP3-011/012) paragraph 32(1) states "*No stage of the authorised development is to commence that would affect a public right of way in Schedule 3 or Schedule 4 (footpaths to be stopped up) until a public rights of way strategy, including making up of an alternative right of way (where appropriate) have been submitted to and approved by the relevant highway*

authority in consultation with the relevant planning authority. Paragraph 32(2) goes to say *"Any alternative public rights of way must be implemented in accordance with the approved public rights of way strategy".* The Applicant should be obliged to show that this is achievable.

h) The above difficulties have been identified in the Statement of Common Ground with the Councils (REP1-072). Table 31 on Public Rights of Way ID 15.10 (pp 209 to 211) includes the following proposal, which is not agreed between the parties: *"Provision of a dedicated area amenity space for PRoW users for* ***a period of 10 years*** *from establishment (establishment to be early in the Projects' construction period)*". This proposal was presented to Friston Parish Council on 30 November 2020 and said to be a field near the village which people could use for exercise in place of the PRoW network. This was rejected at the Parish Council meeting with support from a County Councillor as being totally unsuitable and inadequate mitigation for the loss of amenity of the PRoW network.

i) Footpath17 (E-260/017/0) on the western boundary of the substation site, which forms part of the circular walk at the substation site, is also subject to considerable diversions/closure, which further inhibits use of the footpath network.

Temporary Closures of PROWs along the haul road/cable route

6. Footpath 2 (E-354/002/0), a bridleway heading east from Grove Road is part of the Sandlings Way and currently offers residents an additional, and potentially long-distance, walk from the village of Friston. This footpath is however proposed to be used as a pre-construction access and also subject to diversions due to the location of the haul road and Consolidated Construction Compound (Work No 27 on Sheet 6 of REP3-006). The use of this footpath as a pre-construction access raises safety issues for walkers, cyclists and horses, which have not been addressed, and further deprives residents and visitors of a valuable amenity. The diversions on the stretch of FP2 from Friston to Knodishall will continue throughout the construction period as this section of the haul road will be used as access to the substation site by HGVs.

7. There is a total of 26 PRoWs affected by closures and diversions (some in multiple locations) on the 9km length of the haul road/cable route. This can be compared with East Anglia One Bawdsey to Bramford cable route of 37km where 41 PRoWs were affected. The Thorpeness to Friston route therefore proportionately affects 3 times more PRoWs than for the EA1 project.

8. The high number of footpath closures is due to the chosen location of the landfall site and the character of the landscape with more open and accessible land, including Nationally Designated sites, which draw visitors to the area. Visitors to the area will be deterred by the inconvenience of the footpath diversions and the close proximity of noisy, dusty and visually intrusive works. This will cause harm to the tourist economy.

9. The total length of closures along the haul road/cable route is 8.433km and the total length of the diversions is 17.258km (figures taken from the draft DCO). This is unacceptably high and demonstrates the flawed site selection process, both for the SPR projects and the National Grid project, including the selection of the most western substation zone.

10. FP25 (Ref E-106/025/0) is a by-way open to all traffic linking B1353 at Aldringham to Sizewell Beach. The by-way forms part of the Emergency Escape Route for Sizewell, but is proposed to be diverted in the vicinity of the haul road/cable route. It is not clear whether access will be maintained for vehicles, horses and cyclists. Sizewell Gap Road is the

only classified road in and out of Sizewell and SPR also plan closures on this road. SPR appear not to have properly considered the Emergency Plan necessary for the nuclear plants and Sizewell village.