

## **RHETT GRIFFITHS - ORAL TESTIMONY (OFH3)**

### **Introduction**

Good afternoon, I'm Rhett Griffiths, an Aldeburgh resident who has made written submissions on cumulative impact before.

### **1. Lived experience of cumulative impact**

In terms of lived experience, the cumulative impact of even the current active projects is already weighing heavily on the area and is extraordinarily stressful.

We are already seeing increasing and significant traffic disruption that feeds into all areas of life, pressure on the tourism experience and local businesses, and growing impacts on people's wellbeing and mental health, well before the main construction phases have begun.

Sizewell C is only just ramping up and other projects including but not limited to the National Grid Friston Hub, EA1N/EA2 are only just starting. When you look at the predicted overlap of peak construction activity across multiple planned projects — which has not been properly assessed in a realistic way, we are nowhere near the peak yet — we are in the foothills of the Himalayas ahead, well before the most significant impacts kick in.

The realistic prospect is a continuous, multi-project programme of construction over many years, bringing with it prolonged and overlapping duration of these cumulative effects over many years, with little or no respite.

Sizewell C alone places very significant strain on the area. Sea Link would add to that, particularly through use of the existing fragile local road network, which supports everyday life, emergency access, and the tourism economy. This includes the A1094 — effectively the sole and in places narrow arterial route from the A12 to the coast.

Yet a proper cumulative traffic assessment, including junction modelling, has still not been provided. This modelling was raised by ExA in the 2nd Written Questions for deadline 5, but the necessary modelling is now only expected at Deadline 6, with very limited time remaining in the Examination.

For a project that has been in development for many years, this is staggering and unacceptable, this highlights my concern that the cumulative traffic effects have not been properly assessed, and is an example of the many shortcomings in this application.

### **2. There has been Assessment failure → precaution**

There is no complete or coherent cumulative assessment, and the material provided is not sufficiently location-specific and does not reflect lived experience conditions on the ground.

As well as no complete, holistic assessment across projects, there is insufficient data to support the conclusions drawn.

As a result, the assessment of significance is not robust. In the absence of a complete cumulative assessment and sufficient data, impacts cannot be assumed to be limited. It is not possible to conclude that effects will be minor. A precautionary approach is therefore required, and there is a clear and credible risk of significant adverse cumulative effects.

### **3. ExA precedent gives clear guidance**

This is reinforced by the findings of the Examining Authority for EA1N and EA2

They concluded that local harm was substantial and that mitigation was only just sufficient on balance.

They also warned that cumulative effects in the Friston area were already so substantially adverse that the utmost care would be required in considering any further development.

We are now in precisely that situation, with further infrastructure proposed in the same area. That is clear guidance for the consideration of this Application.

#### **4. Mitigation and DCO control**

I oppose the project and do not consider that a robust needs case or proper alternatives assessment has been demonstrated in a policy-compliant way (2024 EN-Suite).

However, if consent were to be granted, mitigation cannot be relied upon where the cumulative impact assessment is incomplete, because the scale and interaction of effects are not properly understood.

Furthermore mitigation must be secured within the DCO itself. It cannot be left to outline plans or future agreement with councils. If mitigation is not secured at this stage, it will not be delivered in practice.

This is particularly important given the continuous and overlapping nature of these impacts. Without effective coordination between projects, there will be no meaningful respite.

As an example, working hours must therefore be aligned across projects (e.g. with SPRs) to ensure that there is at least some respite for residents and for visitors and the tourism economy. Without that coordination, the reality will be continuous disruption over many years. This should include clear limits on construction hours — weekday and Saturday daytime only, after 8am — with no routine Sunday or Bank Holiday working unless specifically agreed.

#### **Closing**

In summary, the cumulative impact is already being experienced, the assessment remains incomplete despite repeated requests from the Examining Authority, and there is a clear and credible risk of significant adverse cumulative effects.

In those circumstances, the Application does not demonstrate a [REDACTED] or [REDACTED] cumulative impact assessment, and this is a matter which goes to the heart of whether development consent can properly be granted.

Thank you.