

**National Grid Electricity Transmission's (NGET) Sea Link Project  
and  
National Grid Ventures' (NGV) Eurolink Project**

**Public Consultation 24<sup>th</sup> October 2022 to 18<sup>th</sup> December 2022**

**Comments of Friston Parish Council (FPC) pertaining to both projects**

**Introduction**

1. The National Grid Group are promoting three projects in the area each with a connection at the proposed National Grid (NG) connection hub comprising substation, three cable sealing ends and additional pylons at Friston, which in itself was an NSIP included within the DCO Applications made by Scottish Power Renewables (SPR) for East Anglia One North (EA1N) and East Anglia Two (EA2). These DCOs were granted on 31<sup>st</sup> March 2022 but are currently subject to Judicial Review.
2. Given the clear intention of NG (despite its denials) to create a "connection hub" at Friston, FPC is responding jointly to the Sea Link, Eurolink and potentially the Nautilus projects within these comments.
3. The plans produced in the consultation do not properly show the connection hub at Friston it only shows the substation. The cable sealing ends which are substantial structures have not been shown nor the realigned pylon line with replacement and additional pylons.

**The Planning Inspectorate's (PINS) Examinations of EA1N and EA2**

4. The Consultation material for Sea Link and Eurolink (the Projects) makes no reference to the matters discussed in the Examinations of EA1N and EA2 nor to the published Recommendation Report by the Examining Authority (ExA). In Volume 2 of that Report, Chapter 28, Conclusions on the Case for Development Consent (page 274) the ExA stated at paragraph 28.4.5 in respect of the proposed NG substation extension at Friston:-
5. *"the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are **so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.**"*
6. Neither NGET nor NGV has considered these substantial adverse effects at Friston and the consultation materials show a disturbing lack of familiarity with key determinations set out in the ExA's report, including on flooding, landscape, noise, construction hours etc. NGV/NGET should use the determinations of the ExA as the

starting point from which to begin consultation. This has created inefficiency and will continue to do so and wastes the time of the community.

7. FPC has made a number of specific comments to which FPC would like specific response from NG not some generic consultation response.

### **FPC's Position**

8. Friston Parish Council opposes all onshore elements of Sea Link, Eurolink and Nautilus projects in East Suffolk not least because projects do not generate any renewable energy or improve energy security. They create no long term employment. They will cause widespread environmental damage and pose a further risk to the local tourism sector, a key part of the local economy.
9. The community in this area of East Suffolk has borne a heavy load of consultation in relation to energy projects over the past four to five years and NGET and NGV show no consideration of this. No sooner had the consultations begun on 24<sup>th</sup> October, Sea Link submitted its Scoping Report to PINS which increased the burden on all local authorities (Suffolk County Council, East Suffolk Council and all Town and Parish Councils) to make a response by 22<sup>nd</sup> November whilst the Consultations were still ongoing. This was against the advice of PINS at the meeting held on 20 June 2022, whose Meeting Note records *"The Inspectorate advised the Applicant to wait for the consultation period to close **before** submitting its scoping request."*
10. Having responded to the Scoping Report, local authorities are now faced with producing consultation responses to Sea Link and Eurolink by 18<sup>th</sup> December (or effectively Friday 16<sup>th</sup> December). This shows remarkable arrogance and lack of concern for the local community by NG. Please note PINS also stated at the 20 June 22 meeting that *"The Inspectorate responded that considering the amount of consultation in the East Anglia region, the Applicant should be aware of what procedures can be taken forward in a combined matter to minimise resourcing pressures"*.
11. In the current circumstances can we expect a separate Scoping Report to be submitted for Eurolink with the consequent burden on Councils to respond again within a short timeframe? The cavalier way NG has chosen to ignore the considered advice of PINS is concerning. Subject to the outcome of the Judicial Review, if these projects proceed, NG's conduct so far does not bode well for the efficiency of the process for Sea Link, Eurolink and Nautilus. Would NGET and NGV please therefore follow PINS advice and combine consultations or documents requiring responses wherever possible. In this context FPC points out that the onshore impacts of these projects in Suffolk are similar and may become identical.

### **The Consultations**

12. The in-person consultations have been confusing with NG personnel giving conflicting answers, for instance as to whether the DCO will consist of only extensions to the Friston substation or provide for an entire new NG substation.

This is a fundamental question which it appears NG cannot answer at this time. As such the Consultations are premature.

13. The maps provided at the Eurolink consultation were also confusing with the Suffolk Heritage Coast shaded in such a way as to obliterate any detail on the map. For example, Aldeburgh and Thorpeness were not identifiable and the coastline itself invisible.
14. The online Sea Link webinars have not been easy to access with registration and links changing within an hour or two of the events. Insufficient time has been left in these webinars for questions from stakeholders to be answered fully by NG personnel. As such it seems that NGET and NGV simply want to make their presentations but do not wish to hear the views of local people.

### **Site Selection**

#### **Landfall**

15. Landfall Option S2 is the only location where all three projects can be brought ashore together. This location has numerous constraints in terms of nature conservation sites, which include an SSSI and a RSPB reserve, as well as having extremely poor ground conditions, which are extremely wet. Notably NG have done no ground investigations to establish whether a trenchless technique is possible or consulted with the relevant nature conservation bodies such as Natural England or the RSPB. The choice of this landfall site is therefore inappropriate and premature. FPC opposes Option S2 and all other landfall locations on the Suffolk Heritage Coast as proposed by Eurolink and Sea Link.

#### **Converter stations**

16. Sea Link proposes two preferred sites for its converter stations, being Site 1, near Blackheath Corner near the junction of the B1069 and A1094, and Site 3 at Saxmundham, adjacent to Hurts Hall (Listed Grade II). Site 3 would require a new access road to be built near Hurts Hall which would be damaging to the landscape and to the setting of the Listed Building, however no plan of this was provided in the consultations. Site 1 would require all construction traffic to use the A1094, which has already been planned as the access road for the SPR projects., which FPC understands have been delayed by two years. This would put an unacceptable traffic load on an already unsuitable access route for construction traffic.
17. Sites 1 and 3 are put forward as locations where converter stations for all three projects could be co-located. It is assumed that the three projects would be Sea Link, Eurolink and Nautilus. If Nautilus does connect at the Isle of Grain, it needs to be clarified that the converter station site would be for Sea Link and Eurolink only. Eurolink proposes two other options Site 4 near Theberton and Site 5 near Knodishall, however it is unclear whether these sites could accommodate all three projects. FPC considers the industrialisation of East Suffolk by numerous energy projects to be completely unacceptable and that these Projects should be directed

to brownfield sites nearer to where the power is needed (i.e the south-east) and include offshore co-ordination to minimise onshore impact.

#### NG Connection Hub at Friston

18. As stated previously NG have ignored the express opinion of the ExA in their Recommendation Report on the SPR projects that effects of cumulative delivery are **so substantially adverse** and that **utmost care** would be required in any amendments or additions to development in this location. The ExA went on to say at paragraph 7.5.60:-
19. *“The ExA therefore consider that the extension of the NG substation would intensify and worsen the effects of the Proposed Development on both the local landscape and on visual receptors.”*
20. No care whatsoever has been shown in the proposals for the Projects which will lead to adverse impacts on landscape, noise and flooding, to name just three of many important issues. FPC strongly opposes any development of an energy hub at Friston including any extensions of the NG substation, whether AIS or GIS. FPC also strongly opposes the use of SF6 gasses within the substation due to their known status as “greenhouse gasses” and the impact on climate change. FPC is also concerned about fire risk at the site given recent interconnector and substation fires in the UK.

#### Cable routes

21. The choice of the landfall locations and the substation/converter station sites inevitably leads to inappropriate cable routes through very attractive countryside, including Areas of Outstanding Natural Beauty. The selection of Site 3 also involves a wide swathe of both AC and DC cables to the north of the proposed Friston substation site, which would also impact on the setting of various Listed Buildings.
22. The cable routes also impact on Public Rights of Way (PRoWs) which would suffer closure and diversion during the construction period. These PRoWs are important to both local people and especially to local tourism which draws visitors from far and wide to enjoy the open and accessible landscape with its extensive network of PRoWs. FPC objects to the location of all cable routes in the East Suffolk area.

#### Landscape and Visual

23. Paragraph 7.5.60 of the ExA’s Report goes on to say:  
*“The ExA also consider that the extension of the NG substation would have an adverse effect on the landscape through other effects. **The western extension would remove land currently allocated for the proposed northerly SUDs basin.** This would presumably need to be re-located elsewhere and enlarged to accommodate the increased physical footprint of the NG substation. .. It is reasonably self-evident that an enlarged SUDs basin in the landscape would have adverse landscape effect and potentially adverse visual effects too.*

24. The consultation material for the Projects does not contain any information on how these landscape issues would be dealt with nor does it address any further landscaping measures to be taken to minimise the impact of the enlarged substation.

#### **Ecology and Biodiversity**

25. FPC is of the opinion that the landfall site between Aldeburgh and Thorpeness would be extremely detrimental to a wide range of wildlife and ecology and this must be assessed by all relevant expert stakeholders, backed up by local knowledge and experience.
26. Friston currently enjoys a very rural landscape inhabited by a wide range of birdlife, bats, badgers, reptiles, insects etc. Great crested newts have been identified as present in the Grove Wood area, through which NG proposes to connect to the Friston substation.

#### **Cultural Heritage**

27. FPC repeats its concern over the impact on Listed Buildings which encircle the proposed NG substation at Friston and whose setting would be further diminished by these Projects. The ExA's report stated under Historic Environment that "*Cumulative Effects of the SPR projects with the potential National Grid extension will be increased to Little Moor Farm, the Church of St Mary, Friston War Memorial, Friston House, Woodside Farmhouse and High House Farm.*"
28. Wood Farm (Listed Grade II), which is immediately adjacent to the proposed Site 3 at Saxmundham, has not been identified in the Sea Link consultation material. This must be rectified and an assessment made of the impact the converter station will have on the setting of this heritage asset.

#### **Flooding**

29. Flooding, and in particular surface water flooding, is of extreme concern to the village of Friston and there has been a long history of flooding in the village, which in some instances has caused damage to properties. Any extension of the NG substation will inevitably exacerbate the situation. As noted by the ExA the effects of the proposed substation and any extensions to the north of Friston would be substantially adverse.
30. EN1 requires that all sources of flooding be considered as part of site selection where the Sequential Test should be applied to all sources of flooding. NG seems to be unaware of basic policy requirements and information must be given by NG as to how the converter and substation sites have been assessed against these policies.
31. FPC objects to the extension of the Friston connection hub and if NG is determined to go ahead with this proposal, is absolutely vital that surface water run off is fully and properly assessed and a great degree of detail provided as to how the effects

of pluvial flooding can be mitigated. Further all forms of flooding must be considered and assessed for all locations being proposed by Sea Link and Eurolink.

### **Geology**

32. For reasons which are not apparent, NG has considered groundwater levels and the effects of introducing hardstanding in this section. FPC consider that ground water levels should properly be considered (including an increase in the ground water levels in the village) along with other forms of flooding and a proper assessment made.

### **Agriculture and soils**

33. East Suffolk is an important area for the production of cereals, root crops and some livestock. There is a considerable amount of BMV land along the cable routes, converter and substation sites, which will either be temporarily or permanently taken out of use. It is important, particularly in the context of a global food crisis resulting from the war in Ukraine, that this loss is acknowledged and assessed in the planning balance.
34. The ExA's report at paragraph 16.5.11, it is stated that the ExA concludes that the local impact of the NG substation in respect of land taken out of existing use is **major adverse**. Land at the substation site is Grade 2 or 3 and any extension will take further BMV land permanently out of agricultural production. As indicated above the global food crisis requires much greater weight to be placed on the loss of agricultural land, particularly the best and most versatile agricultural land.

### **Traffic and Transport**

35. Given the plethora of energy projects proposed for this region, it is vital that a careful detailed analysis of effects on traffic and transport is carried out. FPC understands that the SPR projects have been delayed by two years and therefore there is the potential for Sizewell C (SZC), EA1N, EA2, the Friston NG substation, Sea Link, Eurolink and Nautilus to be in the construction phase concurrently from 2026 to 2030. The local road network is totally unsuitable for the level and type of traffic which these projects will generate. Full cumulative assessment of traffic associated with these projects is absolutely essential. There is a risk that the cumulative impact of these projects will displace the resident population, who will not find it possible to lead normal lives given the disruption. These impacts will be particularly severe during the Spring and Summer when there are high levels of visitor traffic which is further exacerbated by the numerous festivals which take place during this period.
36. There is no information on where vehicles would access the NG connection hub at Friston for construction works. The proposed "operational" access road planned to be constructed off the B1121 between Friston and Sternfield under the SPR projects is unsuitable. Use of this access road would lead to increased traffic through the village of Friston and also along the very narrow winding road through Sternfield village, which also requires the negotiation of a single lane humpback bridge.

37. The landfall site at Aldeburgh would also increase traffic along the A1094 and into Aldeburgh, where there are a number of notoriously difficult, dangerous and congested junctions including Friday Street, Snape crossroads and Blackheath Corner. Full details of the route to the landfall site must be published and an assessment made. It should be noted that SPR had to abandon access via this route for its landfall site due to problems including the inability for HGVs to negotiate the roundabout on the outskirts of Aldeburgh.

#### **Air quality**

38. Due to the high levels of construction traffic and plant, it is essential that air pollution is fully assessed cumulatively with all other projects in the area, including SZC, EA1N, EA2, and all the NG projects. This assessment must be made over a wide area including a long stretch of the A12 from Ipswich to Lowestoft. There are sections of the A12 which are not dualled and there are also residential properties very close to the road.

#### **Noise and Vibration**

39. NG must appreciate how quiet Friston and the surrounding area are. Rupert Thornely-Taylor, a highly experienced acoustic expert who acted for Substation Action|Save East Suffolk, commented that Friston was one of the quietest areas he had ever encountered during his career.

40. The ExA reported following the SPR Examinations:-

*“The ExA concludes that important and relevant differences remain in the context of industrial sound sources introduced to Friston, **a tranquil location** with dark skies.”*

And also at paragraph 13.2.113 of its report:-

41. *“**Friston is a quiet area** so the context must be considered in the respect of the introduction of new industrial sound sources” and “the noise levels measured at SSR9 are consistent with **the inherently quiet rural noise climate of the Friston area**”.*

42. It must be fully understood that Friston is an extremely quiet rural area with very low background noise levels in some cases below those which can be measured by commonly used acoustic equipment.

43. The policy requirement is as set out in EN1 with which Sea Link, Eurolink and Nautilus will have to comply and all sources of noise should be considered accordingly.

44. FPC makes a few specific points below:-

- The impulsive noise of switchgear in the operational phase is capable of waking people from their sleep (as given in expert evidence in the EA1N and EA2 Examinations). It is important that the nature and significance of the impacts are properly understood and assessed.
- In relation to the above FPC objects to the use of SF6 gas due to its links with climate change.

- With regard to all NG connection hub extensions at Friston, it is important that the cumulative sound levels of this hub plus that of EA1, EA2 are incorporated into the overall noise assessment.
- With regard to construction noise, NG have ignored the position which was reached in relation to EA1N, EA2 and NG connection hub in the Examinations. In relation to both noise and working hours the position in these DCOs should be regarded as the starting point for construction noise impacts from which there should be further improvement in terms of lessening environmental impacts. The assessment should include all plant, including diesel generators and air compressors.
- Vibration from construction activities should also be fully assessed.

#### **Socio-economics, Recreation and Tourism**

45. No assessment has been made of the accommodation needs of construction workers for Sea Link and Eurolink. It is vital that this assessment is made cumulatively with all known projects for the area, so that an assessment can be made to check that local people and visitors will not be displaced due to the numbers of construction workers seeking accommodation.
46. There is no information on the number of workers to be employed on these projects and these figures must be provided urgently.
47. The projects do not deliver the creation of any permanent operation phase employment and this should be recognised when considering the planning balance.
48. Tourism is a very important element of the local economy and this will be adversely affected by the disruption caused by the plethora of proposed energy projects in East Suffolk. This must be properly analysed and a full assessment made of the overall effect on the local economy.
49. Recreation will also be badly impacted by the permanent or temporary closure or diversion of PRowS, which will affect local people and visitors alike. The local footpath network is also an important in contributing to visitor attractions in the tourist sector.

#### **Health and Wellbeing**

50. The health and wellbeing of local people has already been badly affected for at least four years by the SPR projects and has led to mental health issues in the population. All projects associated with the NG substation at Friston should have been brought together in one set of consultations and Examination to shorten the length of time residents were subject to the stress of the DCO process and also importantly that people could fully understand the likely impacts on their lives.
51. It is well-known that substation/converter stations can, and do, catch fire and the consequences of this on health and well-being of residents must be taken into account. Further if a GIS option were taken, then the use of SF6 gasses would need to be considered in its impacts on climate change globally and the community locally.



### Cumulative Effects

52. The ExA stated in its Recommendation Report on the SPR projects:-  
***“the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.”***
53. NG appear to be unaware of these findings or feel that it is not in their interests to recognise how constrained the Friston site is in terms of flood, landscape and noise issues, the presence of Listed Buildings, loss of recreational areas and BMV land.
54. All cumulative impacts of Sizewell C, EA1N, EA2, the NG connection hub, Sea link, Eurolink and Nautilus plus potentially North Falls and Five Estuaries must be considered.

### Conclusion

55. The Sea Link and Eurolink projects are being promoted by NG, however they fail to recognise the issues which arose during the Examination of EA1N and EA2, including the NG connection hub NSIP, or in the Recommendation Report issued by the Examining Authority. The ExA found that the **“utmost care”** should be taken. The materials presented in the Non-Statutory Consultation does not demonstrate care, let alone “utmost care”.
56. In this context the DCO process should not be treated as a “negotiating game” whereby NG puts forward an unreasonable position in its initial consultations and any movement from that is regarded as NG demonstrating how fair and reasonable it is as a developer. This is a waste of time and resources for everyone. It is also unfair to local communities and local authorities who have limited time and resources as opposed to NG which has relatively unlimited time and resources.

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