



## **FRISTON PARISH COUNCIL**

### **NATIONAL GRID – SEALINK STATUTORY CONSULTATION**

### **CONSULTATION RESPONSE – DEADLINE 18 DECEMBER 2023**

#### **Introduction**

1. FPC supports the energy infrastructure necessary to address climate change, to increase energy security and to reduce cost to consumers, but not the highly damaging onshore impacts which could be avoided through offshore solutions and/or using brownfield sites. Fundamentally FPC opposes this project, the National Grid connection hub at Friston, EA1N, EA2, Lionlink, Nautilus and any other projects National Grid proposes to connect at the highly unsuitable site at Friston. The comments below are made subject to that fundamental opposition.
2. The recent announcement concerning OCSS highlights yet again the missed opportunities in the transmission of offshore energy. The use of Sealink for the North Falls and Five Estuaries windfarms indicates that the energy from North Falls and Five Estuaries does not need to come to East Suffolk. Therefore the “Suffolk end” of Sealink should be eliminated. Likewise there should be a “Sealink 2” which should connect EA1N and EA2 to London and the Southeast, again without a “Suffolk end”.
3. These comments should not be considered to be a definitive or exhaustive view of the problems with these projects, but those which were most immediately apparent. As you should be aware parish councils have very limited resources.
4. The community is struggling under the burden of multiple projects with multiple consultations and uncoordinated application processes. This renders the entire process unfair. This is damaging the well-being of the community.

#### **Quality (Lack of) of Consultation**

5. This consultation is deeply flawed. It is clear National Grid has:
  - i. ignored the results of the non-statutory consultation – FPC held a meeting with National Grid. Seven members of the National Grid project team attended the meeting yet not one of them had read the consultation response submitted by Friston Parish Council which is a statutory consultee. This response is attached as many if not all of the points remain relevant showing the ineffectiveness of the non-statutory consultation;
  - ii. ignored the findings of the Scottish Power examinations – a clear example is the absence of any consideration of the Examining Authorities’ comments concerning “utmost care”;

- iii. ignored the terms of the Scottish Power DCOs – the proposal to work all day Saturday clearly contradicts these DCOs as is the proposal to use Friston village as a construction route;
  - iv. relied upon information which it knows to be incorrect as an excuse for not assessing cumulative impacts - National Grid states that construction period for Scottish Power projects will be 2023-2026. National Grid know this to be false (it is a matter of public record that the Scottish Power projects have been delayed by two years). Further it is obvious that no construction work has taken place in 2023. Also National Grid is working closely with Scottish Power in relation to the National Grid substation/connection hub. The construction periods will clearly overlap with multiple damaging cumulative impacts;
  - v. ignored the flood risk to the north of the village – the flood risk to the north of the village and in the village is well documented. However National Grid has ignored this.
6. Given this National Grid has not met the legal standards required for consultations.

### **Overarching issues**

7. As this community has argued for many years the unassessed cumulative impacts of all these projects will have a permanent damaging effect on this area.
8. This latest consultation demonstrates yet again the unsuitability of Friston as the connection hub for multiple energy projects. The site is next to a quiet rural village on productive agricultural land, surrounded by listed buildings and which has a serious surface water flood risk and which poses a flood risk to the village.
9. National Grid has not used “utmost care” as recommended by the Examining Authorities for the Scottish Power and National Grid connection hub projects who recognised the unsuitability of the Friston site.
10. In principle FPC supports “coordination” provided it reduces environmental impacts and also the duration of the construction period. Coordination and co-location are different concepts and the two should not be confused.
11. Cumulative effects – There is no evidence that the comments of the Examining Authorities concerning “utmost care” have been addressed. Given the years National Grid have had to conduct environmental assessments, it is not acceptable that so many significant impacts are “to be assessed” particularly when considered in the context of the “utmost care” comments. This approach negates the effectiveness of consultation.
12. Temporal issues - National Grid has completely misinformed itself as to the timing of the EA1N and EA2 projects. It has been in the public domain for over a year that the EA1N and EA2 projects are delayed by at least two years. Referring to construction as being between 2023 and 2026 is woefully out of date. This failure renders the cumulative impact assessment in a number of key areas including air quality, water, noise and traffic almost useless and has undermined the consultation process.

### **Specific Comments arising from PEIR**

13. There follows a number of specific comments which arise from the subject matter and/or content of specific chapters of the PEIR. For obvious reasons these are focused on Part 1 (Introduction) and Part 2 (Suffolk onshore scheme).

## **Part 1 – Introduction**

### **Chapter 3 Main Alternatives Considered**

14. In terms of the Sizewell location this chapter demonstrates that no alternatives have been considered. An obvious alternative would be for EA1N and EA2 connect offshore and the power taken direct to Kent (see paragraph 2 above) or an alternative location in the Southeast/London where the power is required. There are similar considerations for Lionlink and Nautilus. It is notable that this is the approach being adopted for the North Falls and Five Estuaries projects.

### **Chapter 4 Description of the Proposed Project**

15. National Grid Connection Hub - Pylon Realignment and Cable Sealing Ends - clearly a different approach is being taken compared to the Scottish Power EA1N and EA2 DCOs, but there is no explanation of this in the consultation materials including the PEIR. There needs to be a clear explanation of the differences, why they have been made and what infrastructure will be necessary not just for Sealink but for EA1N, EA2, Sealink, Lionlink and Nautilus to connect to the Grid.
16. Construction Impacts - Key concerns are road traffic, construction noise, air pollution, light pollution, multiple cable swathes close to residential buildings, ecology and flood risk. In effect there will be a vast construction site stretching from Friston all the way to Saxmundham. These impacts will be greatly exacerbated by multiple projects – see paragraph 6 below. The scale of the construction impacts is difficult to comprehend as the area stretching from Friston to Saxmundham will become one vast construction site for many years, with the associated noise, pollution, traffic congestion, flood risk, loss of amenity, loss of habitat and other damaging environmental impacts. It will be truly unpleasant to live here. Yet this statutory consultation barely scratches the surface of these issues.
17. Working Hours - working at the weekend will disrupt many people's free time when they are looking forward to enjoying the countryside. This is unacceptable. Saturday working should not be permitted. National Grid has completely ignored the position in the Scottish Power DCOs where working on a Saturday is limited to the mornings. Any Saturday morning working needs to be revisited in any event given the multiplicity of projects and the cumulative construction impacts - see further below.

## **Part 2 - Suffolk Onshore Scheme**

### **Chapter 2 Landscape and Visual**

18. National Grid Substation Design - architectural solutions sympathetic to the rural and historic environment should be used for the substation and other National Grid infrastructure. National Grid has suggested a number of architectural approaches for the converter stations and yet completely ignored the substation at Friston.
19. A GIS substation is far too tall relative to AIS (16m v 6m) and its landscape impact cannot be effectively mitigated. No information has been provided as to gases in the GIS substation. Are alternatives to SF6 being proposed if so what are they?

### **Chapter 3 Ecology and Biodiversity**

20. Construction in particular will have a very damaging impact on the diverse wildlife in this area. These projects will result in the elimination during the construction period of a vast area of habitat stretching from Friston all the way to Saxmundham.

#### **Chapter 4 Cultural Heritage**

21. Not all assets been identified, both designated and undesignated – see EA1N and EA2 examinations.
22. Study areas have been identified at 500m and 2km however this has the effect of underrepresenting the impact on key heritage assets in and around Friston in particular the Grade II\* assets of Friston Parish Church and the Post Mill which lie just outside the 500m line.

#### **Chapter 5 Water Environment**

23. National Grid seems unaware of the water environment in the catchment to the north of Friston. The baseline plans are wrong. The surface water flood risk to the north and above the village and in the village has been ignored when National Grid knows there is a problem. Clearly it has chosen to pretend this issue does not exist.
24. If these projects are to go ahead then FPC remains concerned that the mitigation proposed will not be adequate and the proposals for a discharge pipe under Church Road are not workable.
25. Flood risk during construction is an even greater concern given the large area of land which will be rendered impermeable. Flood risk during construction is an even greater concern given the large area of land which will be rendered impermeable.
26. National Grid is advised to review the submissions made during the examinations for and the Examining Authorities' report for EA1N and EA2. The ExA was very concerned about future development at Friston and highlighted drainage in particular.

#### **Chapter 7 Agriculture and Soils**

27. Loss of BMV land – as noted this is significant but there needs to be greater analysis.
28. Loss of BMV land needs to be broken down, both for Sealink and cumulatively for all projects, between:
  - i. loss during construction and duration of loss
  - ii. loss during operation
  - iii. loss of land used for the infrastructure itself
  - iv. loss of land required for mitigation.
29. This needs to be expressed both in absolute terms acres/hectares and as a percentage of BMV land in East Suffolk.
30. Further as agriculture is a key part of the local economy there needs to be an economic analysis in terms of the loss of productive land and the impact on food security.

#### **Chapter 8 Traffic and Transport**

31. It is unacceptable for the B1121, the road through the middle of the village, is to be used for construction traffic and for there to be accesses off the B1121 to the construction sites. Whilst a B road, the B1121 is narrow and twisty and in places there is not even a white line.
32. In terms of HGVs National Grid is proposing 84 a day which is 7 per working hour which equates to one less than every 10 minutes. The road passes the village green where there is a children's playground. Also there are bus stops either side of the road where pedestrians cross without the benefit of a pedestrian crossing. Given the north of the village will be a no-go area for walking and recreation all village residents will need to walk south which means much more pedestrian traffic across the B1121.
33. The operational access road was discarded as a construction access road due to its unsuitability during the EA1N and EA2 examinations.
34. The B1121 should not be used for HGV traffic, LGV traffic or construction workers travelling to site.

### **Chapter 9 Air Quality**

35. See comments on the construction and cumulative construction impacts

### **Chapter 10 Noise and Vibration**

36. Construction - National Grid needs to demonstrate it can achieve the noise requirements. For example will it be able to achieve the required noise level through BPM (Best Practicable Means) where there are multiple projects conducting construction at the same time? See further comments on the construction and cumulative construction impacts.
37. Operation - all noise at the substations and convertor stations needs to be assessed including the impulsive noise from switchgear. The site is close to a quiet village with very low background noise. There was clear evidence in the Scottish Power examinations that the switchgear, when operated at night, will wake people up. In terms of continuous noise National Grid should take the noise limit of 31dB as a starting point for all infrastructure on a combined basis

### **Chapter 11 Socio- economic Recreation and Tourism**

38. The damage which these projects will cause to this area's key tourism sector is understated.
39. These projects will provide no long-term jobs locally. Therefore these projects offer only economic damage with no economic benefits locally.

### **Chapter 12 Health and Wellbeing**

40. These projects are already damaging the health and well-being of the community. The construction impacts of Sealink in isolation and cumulatively with the other projects will have a very serious effect on the well-being of all local residents many of whom are elderly or vulnerable. These projects do and will continue to blight the last productive lives of many residents. There needs to be a proper assessment of well-being impacts.
41. Fire Safety - substations and convertor stations can and do catch fire. When they do they emit toxic gases. This infrastructure will be surrounded by vegetation which will be very

dry in the summer. Such a risk is unacceptable next to a village. A full fire safety assessment needs to be conducted including the impact of a serious fire upon the village of Friston in the summer months, when prevailing winds could drive the fire and smoke/gases towards the village across very dry vegetation. A similar assessment should be conducted for Saxmundham.

#### **Chapter 14 Inter-project Cumulative Effects**

42. The weakness of the analysis in specific environmental impacts (e.g. landscape, noise, water environment, traffic and transport etc) flows through into the cumulative assessment.
43. The description of other projects is poorly organised. There are serious factual errors in respect of the projects which may significantly affect Sealink. A key example is the construction timetable.
44. This has led to cumulative effects being underestimated. The plans particularly in relation to the other offshore projects are unhelpful both in terms of detail and overall cumulative effect.
45. The length and complexity of this chapter is proof of the excessive burden of at least four other projects (in addition to Sealink and the National Grid connection hub) being developed in the same small area and connecting in the same place where the temporal construction duration of the projects overlap. It is self evident that National Grid has chosen the wrong development and the connection location for these six projects. This is significantly exacerbated by the Sizewell C project.
46. In particular cumulative construction impacts have not been properly assessed which undermines the consultation process. National Grid has included incorrect information on the construction period for the Scottish Power projects (2023 - 2026). These are already running two years late which is a matter of public knowledge and obviously no construction activity has been going on this year. There will be overlapping construction periods for all six projects. It is unacceptable that cumulative impacts are not being assessed and consulted upon based on information that National Grid knows to be incorrect. The cumulative impact of potentially six projects (EA1N, EA2, the National Grid connection hub, Sealink, Lionlink and Nautilus) across a vast construction site will be severe and unsustainable. Key concerns are:
  - i. the capacity of the local road network
  - ii. flood risk during construction when there will be far more impermeable areas created than will exist in the operational phase
  - iii. the combined construction noise from all these projects
  - iv. the combined air pollution from plant emissions and dust
  - v. light pollution from multiple construction sites
  - vi. multiple cable swathes. National Grid estimate the multiple cable swathes between Friston and the converter stations site at Saxmundham will be 180m wide
  - vii. ecology – this vast construction site will disrupt a very large area and effectively eliminate habitat where there is a great deal of wildlife activity

viii. landscape & heritage - this multiplicity of projects will impact the deliverability of landscape and heritage mitigation which will significantly increase the landscape harm.

47. Overall cumulative effects have been severely understated.

**Friston Parish Council**  
**15 December 2023**