

## FRISTON PARISH COUNCIL

### NATIONAL GRID – SEALINK STATUTORY CONSULTATION

#### KEY CONSULTATION RESPONSE POINTS FOR SCC & ESC

- FPC supports renewable energy but not the highly damaging onshore impacts which could be avoided through offshore solutions and/or using brownfield sites. Fundamentally FPC opposes these projects.
- 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.
- The following are key Friston specific issues.
  1. 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 a number of people in the community. You should be aware that two residents of Friston who were actively involved in challenging the Scottish Power projects have died.
  2. 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 poses a flood risk to the village.
  3. 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.
  4. **Construction Impacts** - Key concerns are road traffic, construction noise, air pollution, light pollution, multiple cables 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.
  5. **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. Saturday morning working needs to be revisited given the multiplicity of projects and the cumulative construction impacts.
  6. **Cumulative Construction Impacts** - these have not been properly assessed which undermines the consultation process given the six projects proposed for this area. 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 cables 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 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.
7. **Traffic** - it is unacceptable for the B1121, the road through the middle of the village, to be used for construction traffic and for there to be accesses off the B1121 to the construction sites. In terms of HGVs National Grid is proposing 84 a day which 7 per working hour, one less than every 10 minutes. The road passes the village green where there is a children's playground. Whilst a B road it is narrow and twisty and in places there is not even a white line. The B1121 should not be used for HGV traffic, LGV traffic or construction workers travelling to site. 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.
8. **Flood Risk** - 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 given the Court of Appeal hearing. If these projects 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.
9. **Noise** – all noise at the substations and converter stations needs to be assessed including the impulsive noises 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 31 dB as a starting point for all infrastructure on a combined basis.
10. **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. 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 the environmentally damaging

gases in the GIS substation. Even if alternatives to SF6 are proposed those gases are still likely to be environmentally damaging just not as much as SF6.

11. **Pylon Realignment and Cable Sealing Ends** – clearly a different approach is being taken 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.
12. **Fire Safety** – substations and convertor stations can and do catch fire. When they do they create 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 will drive the fire and smoke towards the village across very dry vegetation.
13. **Quality of Consultation** - 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;
  - 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 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 blindingly obvious that no construction work has been going on 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;
  - v. ignored the flood risk to the north of the village – the flood risk to the north of the village and in the viallage is well documented. However National Grid has ignored this.

Given this National Grid has not met the legal standards required for consultations.

5 December 2023