#### FRISTON PARISH COUNCIL





#### NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

FRISTON PARISH COUNCIL - IP NO Language & SASES - IP Language & SASES - IP Language & Date: 11 November 2025

#### **DEADLINE 1 - WRITTEN REPRESENTATIONS**

Findings of the Examining Authorities for the EA2, EA1N and National Grid Connection Hub

"28.4.4 The local harm that the ExA has identified is substantial and should not be underestimated in effect. Its <u>mitigation has in certain key respects been found to be only just sufficient on balance</u>." (emphasis added)

"28.4.5 ....the ExA observes that the effects of the <u>cumulative delivery</u> of the proposed development with other East Anglia development on the <u>transmission connection site</u> near Friston <u>are so substantially adverse that utmost care will be required</u> in the consideration of any amendments or additions to those elements of the proposed development in this location" (emphasis added)"

#### **INTRODUCTION & SUMMARY**

- 1. These are written representations of Friston Parish Council and SASES Limited<sup>1</sup> (together "FPC"). They build upon FPC's Relevant Representations RR-1693 and should be read together with them.
- 2. FPC would remind the ExA of the burden which this and the other multiple NSIP applications are placing upon our community. Accordingly FPC has limited its written representations to those subjects where we believe more analysis and information would be of benefit to the ExA.
- 3. These subjects are:
  - Cumulative impact
  - Draft DCO
  - Flood Risk

<sup>&</sup>lt;sup>1</sup> SASES Limited is a company limited by guarantee number 13790115

- Fire Safety
- Operational Noise
- 4. With regard to other subjects Friston Parish Council relies upon its relevant representations although some reference is made to those subjects in the representations below.
- 5. Friston Parish Council has a number of concerns in relation to National Grid's Intention To Submit Request for Proposed Changes dated 16 September 2025, particularly Change 2: Change to Work Plans at Friston (Kiln Lane) Substation. FPC's response to the initial consultation are attached as Appendix A.
- 6. FPC would only observe that Change 2 demonstrates yet again the confusion, complexity, work and cost that National Grid is unnecessarily causing as a result of seeking a third consent for the National Grid connection hub.

#### **CUMULATIVE IMPACT**

#### Additional energy projects<sup>2</sup> since cut-off date

7. Since relevant representations were submitted, FPC has become aware of another NSIP called the Helios Energy Park (a solar farm of at least 250MW which is estimated to cover at least 1000 acres) which is being proposed near Friston for connection at the National Grid connection hub. Details are set out in the relevant representation of Helios Energy Park RR-0586 and are also available at heliosenergypark.co.uk. On this website it is stated that:

"We anticipate formally launching the development of the project at the end of 2025."

- 8. In addition there are a further three projects which are to connect at Friston:
  - a. a 240MW battery storage facility is proposed at Red House Farm
  - b. SolarSeven Ltd, Energy Storage System; PV Array (Photo Voltaic/solar)
  - c. Noventum Power Solar 16 Limited, Demand; Energy Storage System; Reactive Compensation
- 9. All four projects are listed in NESO's TEC Register. Screenshots of the relevant pages are attached at Appendix B with each entry highlighted. FPC only became aware of SolarSeven and Noventum projects after OFH1 because they did not appear using a word search of "Friston".
- 10. There is some inconsistency in the terminology used. The Red House Farm entry is listed as "Red House Farm Friston 400 kV 240 MW connection" and then there is a reference to "South Anglia Connection Node E 400 kV substation". This is the stated connection location for the SolarSeven and Noventum projects where National Grid has ceased to refer to Friston. Therefore National Grid has confirmed that the so-called National Grid "substation" is in fact a connection hub (node).
- 11. A question that has to be asked is how many more NSIPs and energy projects are going to be proposed next to Friston drawn by the National Grid connection hub/node with ongoing construction works for connection hub extensions and cabling, with no end point in sight?

<sup>&</sup>lt;sup>2</sup> There are other major development projects in this area including the recently announced Essex & Suffolk Water, Suffolk Water Recycling, Transfer and Storage Project.

#### 12. All these works:

- will continue the noise, highways, landscape, and other impacts from construction, those impacts being substantially exacerbated by overlapping/sequential construction periods;
- impact landscape mitigation, delaying and/or removing existing landscape mitigation for other projects;
- worsen flood risk and may interfere with flood risk mitigation due to construction works, and then permanently with expansion of the footprint of the National Grid connection hub;
- result in the further loss of very substantial amounts of BMV land.
- 13. FPC has already pointed out the inadequacy of National Grid cumulative impact assessment in its relevant representations. Those inadequacies are worsened by these proposed projects. A very clear example of inadequacy is the fact that National Grid has stated in Chapter 13 of the Environmental Statement APP-060 that Lionlink is 13.96 km from the Suffolk Onshore Scheme see top of page 10.
- 14. In terms of cumulative assessment Friston as a strategic connection point has a number of aggravating factors. It is
  - a. a site of known flood risk;
  - b. the village sits at the bottom of a shallow bowl where the substations site is at a higher elevation to the village;
  - c. it is next to a quiet rural village;
  - d. the site is surrounded by residential dwellings and listed buildings; it has already been found in the examinations for EA2 and EA1N that the harm to heritage assets from the existing projects is at the upper end of less than substantial harm;
  - e. the site overall is very constrained relative to the number of proposed connections.
- 15. Yet with all these projects and given the approach National Grid is taking, there could be at least nine<sup>3</sup> cable routes coming into the substations site plus others close by (e.g Sealink landfall to convertor station DC route).
- 16. It is to be expected that National Grid will state that
- the third project (see paragraph 35 of FPC's relevant representations)
- the Helios Solar Farm
- the Red House Farm energy storage system
- SolarSeven Ltd Energy Storage System and PV Array
- Noventum Power Solar Energy Storage System,

are too uncertain, or there is not sufficient information to carry out an assessment.

<sup>&</sup>lt;sup>3</sup> EA2, EA1N, Sealink (AC), LionLink (AC), Third Project (AC), Helios Energy Park, Red House Farm Energy Storage System, SolarSeven Ltd Energy Storage System 7 & PV Array, Noventum Power Solar Energy Storage System

- 17. In terms of certainty at ISH1 Mr. Stevens from the Applicant, in explaining the need for Sealink, referred to Sealink being needed for "contracted" generation. He confirmed in a response to a question from FPC that this included projects on the TEC register and the Interconnector register. However his response on whether these projects' impacts should be cumulatively assessed was less clear. Fundamentally it is illogical for the need case for Sealink to be justified by "contracted" generation when the projects that will deliver that generation are not cumulatively assessed. Put another way how can the environmental impacts of projects on the TEC register not be cumulatively assessed when the need for Sealink is being justified by the generation capacity of those projects?
- 18. In relation to the third project shown on the National Grid masterplan, National Grid should either cumulatively assess the impacts or rule out the development of such a project.
- 19. As to the sufficiency of information projects such as these are now well understood in terms of their technology and construction. By way of illustration:
  - a. each project will require a cable route to the National Grid connection hub and the location of each of these projects is known by their developers. The construction requirements and timescales for laying underground cables is well understood;
  - b. the scale (e.g. land use) of converter stations, solar farms and battery storage is well understood as is their construction. For example National Grid has already demonstrated this in its master plan which was attached as Appendix 2 to the FPC Relevant Representation and which is attached at Appendix C for ease of reference;
  - c. the scale of the extensions required to the connection hub is also well understood. FPC attended a presentation by Scottish Power and National Grid on the design of the infrastructure at the substations site. A PowerPoint slide was shown (but not subsequently distributed) which showed the extension needed for Lionlink and proposed cable route from the converter station site at Saxmundham to Friston. Please note that rather than following the Sealink route it showed a different route to the east of High House Farm with apparently no regard to residents in that area.
- 20. Further Government Guidance<sup>4</sup> accepts that information "may be qualitative and high-level" and that where data about development is incomplete that "a precautionary but reasonable approach should be taken based on the best available evidence".
- 21. Given the climate crisis, the urgent need to move to net zero and government policy both in terms of renewable energy and growth, it is highly unlikely that any energy project which can be branded as contributing to net zero and growth will be refused. The history of consents granted to date clearly demonstrates this, and most of these consents were granted before the current government came into office. Furthermore the very presence of the strategic connection hub at Friston makes it even more likely that these projects will go ahead.
- 22. Therefore in reality whilst there is some uncertainty, it far from prevents a robust cumulative impact assessment in respect of these projects. In fact it is evident from the Helios Energy Park relevant representation that it is understood there will be significant cumulative impacts see section 4 of their relevant representation <a href="RR-0586">RR-0586</a>. It should be noted that Helios are keen to collaborate with National Grid and recognise opportunities and benefits of doing so. It seems that Helios is able to do this despite being a wholly independent company unlike NGV and NGET who are part of the same National Grid group with boards of directors who are appointed by National Grid plc.

<sup>&</sup>lt;sup>4</sup> Government Guidance Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment

- 23. The Government Guidance contemplates the need to examine projects such as these. The Overview acknowledges that there is "a broad… <u>temporal</u> zone of influence". Further given the identification of the Helios Solar Farm, the Red House Farm Energy Storage System, the SolarSeven project and the Noventum project in the TEC Register, and the space allocated to the Third Project on the National Grid masterplan these projects fall to be examined not least given the ample information upon which to undertake a cumulative impact assessment and the high likelihood of these projects receiving consent.
- 24. Otherwise an approach which allows National Grid <u>not</u> to carry out a cumulative impact assessment in respect of these projects is tantamount to National Grid "having its cake and eating it". On the one hand it wants to avoid a cumulative impact assessment of the projects with connection offers or otherwise planned, yet on the other to have complete freedom to offer connection points to a seemingly unlimited number of projects, creating a huge level of uncertainty with the prospect of long-term disruption from construction into the mid 2030s and possibly beyond.
- 25. This level of disruption and uncertainty makes it very difficult, if not impossible, for people to live peaceably and to plan for and look forward to the future. This impact on people's lives and wellbeing is so significant that Protocol 1 Article 1 Protection of Property and Article 8 Right to Respect for Private and Family Life of the Human Rights Act 1998 need to be examined as to whether all of this activity and uncertainty is compatible with such rights. FPC considers that the current approach of National Grid sanctioned by DESNZ is incompatible with these rights.

#### Mitigation of Cumulative Impacts

- 26. The last paragraph of government guidance relating to mitigation and monitoring states that "applicants should consider opportunities to develop holistic mitigation strategies in collaboration with other... developers". A clear example of such a holistic strategy would be for Sealink, Lionlink and the third project to share the same cable route from the converter stations site to the substations site, and the ducts for future projects to be installed at the same time as those for Sealink. There is no evidence of such an approach being considered despite the obvious benefits in respect of environmental impacts and also cost savings and efficiencies overall for National Grid. In fact the opposite is being considered see paragraph 17(c) above. In situations such as these National Grid often seeks to rely on artificial distinctions between NGET and NGV. However this just reflects a lack of will. Undoubtedly collaboration on this issue between the Secretary of State, OFGEM and National Grid can result in an efficient and cost effective solution beneficial for all including consumers.
- 27. With regard to the disruption and uncertainty referred to above one approach could be that National Grid commits to a reasonable maximum number of connections that will be made at its connection hub at Friston and a reasonable deadline by which all development will be complete, subject to a cumulative impact assessment.

#### **DEVELOPMENT CONSENT ORDER**

28. FPC understand there are ongoing negotiations between some statutory authorities and National Grid in respect of the terms of the draft DCO. Those negotiations no doubt involve reference to other DCOs as precedents. National Grid seem to be in denial that the most relevant precedents for the substations site are the EA1N and EA2 DCOs. Given these ongoing negotiations, which do not involve parish or town councils, the published draft DCO has been superseded. It is assumed an updated version will be provided at Deadline 1.

#### Reduction of mitigation for the National Grid connection hub

- 29. In its relevant representations FPC set out the flawed manner in National Grid prepared the draft DCO. FPC does not have the resources to do a textual analysis to compare the wording of the DCO for the National Grid connection hub in the EA2 and EA1 DCOs (which for all intents and purposes are identical) with the wording for the National Grid connection hub in the draft Sealink DCO, to assess the full extent to which National Grid is seeking reduce the mitigation which has already been determined for the National Grid connection hub. Such a textual analysis should set out clause by clause and paragraph by paragraph where the wording is different in the draft DCO from the existing consents, insofar as they apply to the National Grid connection hub. In addition if National Grid continues to seek to resile from the existing mitigation it should explain why it is necessary to reduce the mitigation for the National Grid connection hub.
- 30. Of course if National Grid was not seeking a further consent such a textual analysis would not be necessary, particularly in circumstances where it is using the application for an additional consent as an opportunity to resile from the mitigation which has already been determined by another ExA to be necessary after an extended 9 month examination period.
- 31. An example of why such analysis is necessary is the difference between Schedule 3 Requirements of the draft DCO and Schedule 1 Part 3 Requirements of the EA2 DCO in relation to the onshore part of the project<sup>5</sup>.
- 32. Furthermore in relation to the various outline plans which are secured in the EA2 and EA1N DCOs and which set out more detail of mitigation (for example the Outline Operational Drainage Management Plan and the Outline Landscape And Ecological Management Plan) National Grid should set out the specific areas where the mitigation has been reduced and why. The ExA should be aware that when FPC attended a design meeting for the local community hosted by Scottish Power and attended by National Grid, a National Grid representative was asked about National Grid's approach to mitigation and in particular was asked why the period of maintenance for landscape mitigation had been reduced from 10 years to 5 years. The answer provided was that 5 years was "standard". This is a totally inadequate response.

#### Mitigation of flood risk

33. FPC has been engaging with Suffolk County Council in relation to its discussions with Scottish Power concerning operational drainage and the agreement of the Operational Drainage Management Plan as part of the discharge of requirements process under the EA2 DCO. No doubt Suffolk County Council will address the subject in more detail in its local impact report. Now that proper survey work has been conducted at the site it would appear that for the Scottish Power projects the SuDS basins can operate as infiltration only basins and there will be no need to discharge any water into the Friston watercourse/main river which runs from the substations site and through the village. Therefore the order limits do not need to include the Friston watercourse/main river.

#### Circumstances in which Scenario 2 consent applies

34. As set out in FPC's letter of 14 August 2025 AS-073, National Grid has made inconsistent statements in respect of the circumstances in which the additional consent will be used. It should not be used if either the EA2 or EA1N projects proceed. There is great capacity for confusion if either of those projects go ahead (and in fact EA2 is going ahead) and the Sealink

<sup>&</sup>lt;sup>5</sup> https://www.legislation.gov.uk/uksi/2022/433

DCO contains a consent for the National Grid connection hub. FPC's position is that scenario 2 simply should not be examined for reasons previously stated. However if it is and a single DCO is granted for Sealink then the provisions of the Sealink DCO which represent the consent for the National Grid connection hub should be expressly disapplied and be of no effect if either EA2 or EA1N proceed. This will avoid any confusion as to under which consent the National Grid connection hub has been built, thereby avoiding confusion as to who is responsible for implementing and maintaining mitigation measures as well as other matters.

35. At ISH1 National Grid seemed to change its position yet again referring to "land rights" without specifically explaining why this issue merited an additional consent, set against all the evidence given in ISH1 that EA2 is rapidly progressing. Probably the most telling piece of evidence is that Scottish Power has entered into binding contracts with its contractors for EA2.

#### LANDSCAPE & HERITAGE

36. As set out in FPC's relevant representations and as referred to above, the further connections at the National Grid connection hub for the Helios Solar Park, the Red House Farm Energy Storage System and the SolarSeven and Noventum projects will require yet further expansion of the hub with yet further damage to the landscape as set out in paragraphs 44-48 of those relevant representations.

#### **FLOOD RISK**

37. Flood risk and flood risk mitigation should be revisited given the recent work between Suffolk County Council and a Scottish Power in relation to the mitigation of flood risk at the substations site. FPC would expect this matter to be discussed in SCC's local impact report in relation to flood risk.

#### **NOISE**

- 38. FPC thanks the ExA for raising the issues of:
  - construction noise temporal restrictions; and
  - Friston substation operational noise assessment,

in its letter of 5 September 2025.

39. In this section FPC makes reference to a submission which SASES made in the EA2 and EA1N examinations ("SASES 21 March Submission") REP8-220.

#### Construction noise – temporal restrictions

40. It may be instructive for the ExA to consider the construction phase noise and vibration management plan which has recently been prepared by Scottish Power in respect of both EA2 and EA1N which is currently subject to a discharge of requirement process. A copy of the relevant extracts of this plan are attached at Appendix D. This plan applies not only to the EA2 and EA1N<sup>6</sup> substations but also to the National Grid connection hub. In particular FPC would point to paragraph 3.7.2 (core working hours) and the contrast between that and National Grid's response set out at the top of page 16 of its letter of 16 September 2025. National Grid has provided no justification of why it cannot abide by the noise and vibration management

 $<sup>^{</sup>m 6}$  There is a separate discharge process for EA1N but the plan is identical

plan for the National Grid connection hub in the EA2 and EA1N consents. The concept of core working hours arose from discussions between a Scottish Power experts and SASES expert which is set out in paragraphs 9 and 10 on page 2 of SASES 21 March Submission REP8-220.

#### Friston substation operational noise assessment

- 41. FPC does not have the benefit of the expertise of an acoustic consultant, but it is familiar with the variance of expert opinion there can be between acoustic consultants from its experience with the EA2 and EA1N examinations. In those processes SASES had the benefit of the advice of Rupert Thornely-Taylor, a leading acoustic expert. Therefore whilst FPC does not have the expertise to challenge the technical aspects of the response from National Grid in its letter of 16 September 2025 starting at the foot of page 17, it is sceptical of the assurances given. In this examination FPC is reliant upon the ExA in ensuring that the operational noise from the National Grid connection hub will be compliant with policy.
- 42. FPC's concern with regard to operational noise from the National Grid connection hub arises from the EA2 and EA1N examination as it does not believe this issue was satisfactorily resolved.
- 43. FPC would make the following comments on National Grid's response.
  - a. It is very surprising that an organisation such as National Grid has limited data for noise levels from GIS switchgear operation. This is very unsatisfactory. It is even more unsatisfactory for National Grid's assessment to be based on "indicative" information provided by its own team, which inevitably will be self-serving. The reliability of this information is questionable. By way of contrast the SASES 21 March Submission contains some information for the National Grid connection hub at the bottom of page 9. FPC understands there is a difference between noise levels for AIS switchgear and GIS switchgear but no information has been provided on that subject in National Grid's letter of 16 September 2025.
  - b. National Grid statements of representative night time background level are wrong. The area around Friston is exceptionally quiet. This was shown in the EA2 and EA1N examinations (and reference is made to paragraph 3 on page 7 of the SASES 21 March Submission). In addition these exceptionally low noise levels are shown by the more recent sound level of monitoring carried out by Scottish Power which is set out in section 7 Baseline Conditions of the Construction Phase and Vibration Management Plan Appendix D. This shows that in three out of the four sound monitoring sites closest to the substations site (SSR2, SSR5, SSR6 and CCR18 as shown in the plan set out on the last page of Appendix D) the median night-time sound level was 19/20 dB. In fact noise levels could be even lower because these low levels are below the level at which most acoustic equipment can measure i.e. if noise levels are lower than 19/20 dB the measuring equipment will still show a noise level of 19/20 dB. In relation to the other monitoring site, SSR6, monitoring was only carried out for a short period, 30 minutes at night time and one hour at daytime and therefore the results are open to question.
- 44. As a result there is a situation where there is no reliable noise level information for the National Grid switchgear, whose noise has then been assessed against an incorrect background noise level. National Grid's statements on this matter cannot be regarded as in any way reliable.

- 45. Turning to the practical question of what the noise requirement (secured in the DCO) should be for the National Grid connection hub (covering all noise sources not just switchgear), there could be a number of parameters/controls for example:
  - a. in usual operation there will be no noise from the National Grid connection hub;
  - b. there could be an absolute limit on the noise to be emitted from National Grid switchgear and a separate limit for other equipment such as generators, cooling fans etc:
  - c. there should be a restriction so that no testing of such equipment can take place outside the hours of 9 am to 5 pm Monday to Friday and then only once every three months:
  - d. great emphasis is placed on the fact that this equipment will only operate "infrequently" and/or "in emergencies". The question is how often will there be emergencies. Further the greater the number of connections to the connection hub the greater the number of circuit breakers/switchgear and the greater likelihood of emergencies. Therefore there should be an absolute limit on the number of emergencies over a period and if this limit is breached that will trigger remedial action, to be defined.

#### **TRAFFIC**

- 46. FPC has little further to add to its Relevant Representations. As the ExA is aware FPC's view is the B1121 through Friston and Sternfield should not be used as an HGV route and should not be used by other construction traffic.
- 47. By way of illustration of the unsuitability of the B1121 for HGV traffic, HGVs are accessing farm buildings at Red House Farm and Hill Farm along the B1121 from Bigsby's Corner. They are both causing a hazard, as traffic coming in the opposite direction has to stop, but also causing serious damage the roadside with verges being seriously eroded. The B1121 from the proposed operational access road to Friston is of a very similar nature being narrow and twisty, therefore demonstrably unsuitable for HGV traffic.
- 48. A concern relating to cumulative impact is that this disproportionately sized entrance would be used for construction when the National Grid connection hub has to be expanded for future projects.

#### **SAFETY**

- 49. The National Grid connection hub alongside the Scottish Power substations and the proposed converter stations represent a significant fire risk as referred to in FPC's relevant representations.
- 50. Looking at the relevant representations of emergency services/1<sup>st</sup> responders, relevant representations been received from the Suffolk Constabulary and the East of England Ambulance Service NHS Trust, but not from the Suffolk Fire and Rescue Service.
- 51. It is of concern that in the latest assessment of the Suffolk Fire and Rescue Service available on the website of HM Inspectorate of Constabulary and Fire and Rescue Services, that both "understanding the risk of fire and other emergencies" and "responding to fires and other emergency" are assessed as "requires improvement". That would seem to be borne out by

SFRS not engaging with the examination process. A screenshot of the relevant page from the HMICFRS is attached at Appendix E.

52. In contrast the East of England Ambulance Service NHS Trust (EEAST):

"consider that the Project (Sea Link) is likely to have a significant impact on its emergency ambulance operations, service capacity and resources (staff, vehicle fleet and estate assets) requiring appropriate mitigation and management measures to be identified and secured through either a planning obligation or Deed of Covenant."

#### **TOURISM AND SOCIO-ECONOMIC IMPACTS**

- 53. Sealink, the National Grid connection hub and current proposed projects do not provide any permanent jobs in East Suffolk they only have potential to damage tourism and agriculture, two pillars of the local economy.
- 54. National Grid have made no contribution to the Friston community unlike Scottish Power, although even that contribution does not begin to reflect the damage that has and will continue to be caused to Friston.
- 55. Whilst the subject may not be of direct relevance to the ExA, FPC would like to put on record the defects of the Government Guidance (Community Funds For Transmission Infrastructure) on this subject. This guidance is based on deeply flawed research published in 2024, entitled Community Benefits for Electricity Transmission Network Infrastructure. The Friston community did raise the inadequacy of this research with DESNZ in the context of what is happening in this community. Not surprisingly DESNZ did not accept this community's views and have refused to engage in further correspondence on this subject.
- 56. The guidance itself is flawed as (aside from transmission lines) it takes no account of the scale of infrastructure involved only its type. Substations/connection hubs can vary greatly in scale and in the number of connections they may draw. But the real problem is the reliance on the social research.
- 57. The social research was on the basis of a highly misleading image of a substation, which bears no resemblance to the developments at Friston. Further the question asked in relation to this image was how would you feel if you lived within 15 minutes' walk of a substation? Furthermore no question was asked if multiple developments were to take place in the same small area. In the case of Friston many people live within a two minute walk of the substations site and everybody within five minutes. A screenshot of the relevant image and question is attached at Appendix F so the ExA can judge for themselves the quality of the research.

**END** 

#### **APPENDIX A**

#### NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

Date: 7 November 2025

# RESPONSE TO CONSULTATION ON PROPOSED CHANGES TO THE SEA LINK DEVELOPMENT CONSENT ORDER

- 1. Thank you for your letter of 7 October 2025 concerning the consultation National Grid is conducting with regard to the proposed changes referred to above. FPC has considered this letter and National Grid's letter of 16 September 2025 to the ExA which sets out the proposed changes. FPC notes there is further documentation on the National Grid website concerning these changes but FPC has assumed that this is consistent with the letter of 16 September. Bearing in mind this is a consultation only our comments are relatively brief not least because this is yet another piece of unwelcome work which requires the goodwill of volunteers to examine. Accordingly the comments below cannot be regarded as exhaustive and are initial thoughts only.
- 2. Given our limited resources we have focused on change 2 for the moment but clearly there are serious issues in relation to the Benhall railway bridge which is the subject of change 4. In relation to change 3 we would not want this expansion of the order limits to adversely affect residents near this part of the cable route.

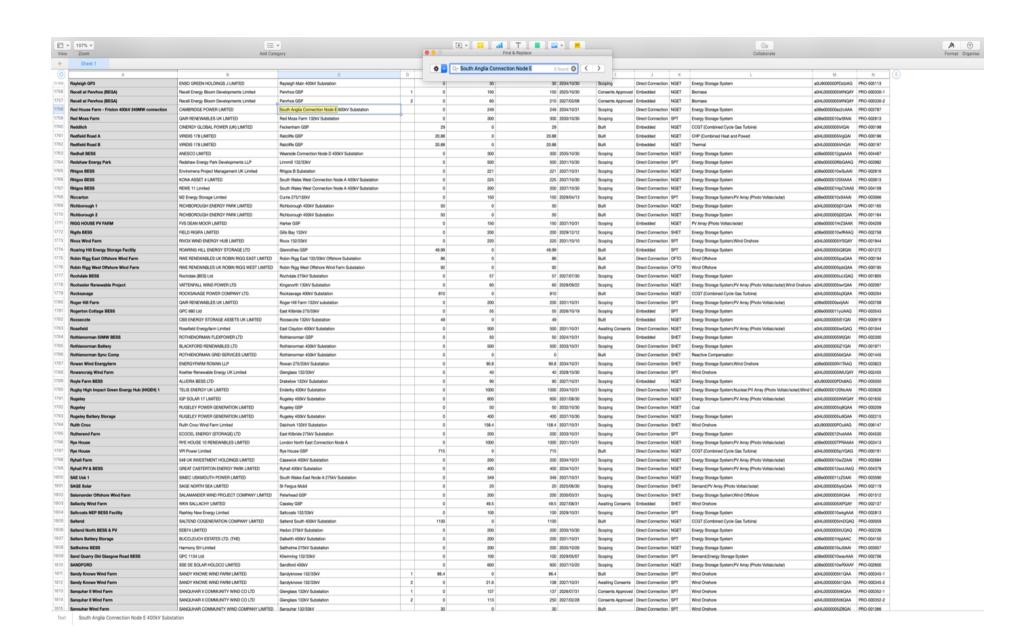
#### Change 2

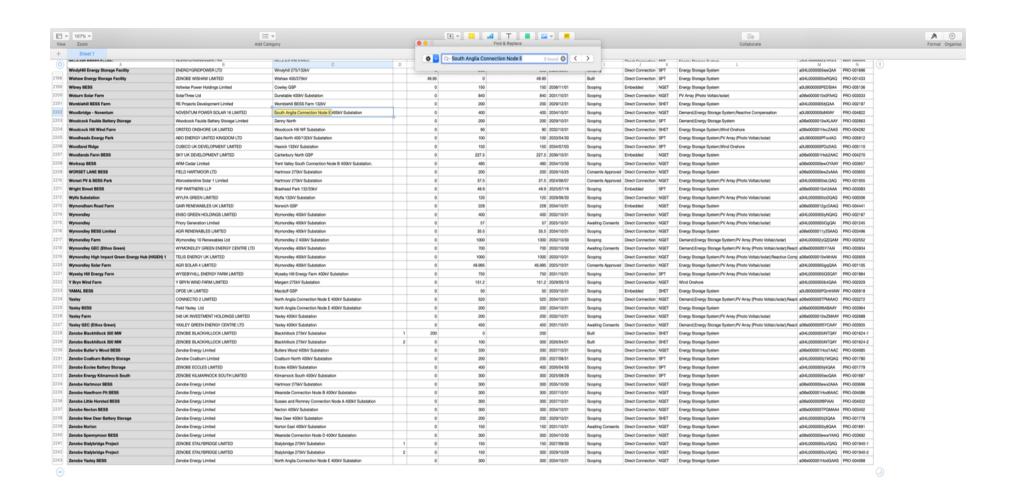
- 3. This change is unnecessary as National Grid already has the consent that it needs as the Scottish Power EA2 project is going ahead. It would be helpful if the language National Grid uses in its documents could be made consistent with its reasoning with regard to scenario two in that the additional consent is only necessary if neither of the Scottish Power projects goes ahead. Accordingly the wording in your letter "National Grid would only deliver the substation under the Sea Link DCO if it was not built under the SPR DCO" should be changed so that it is consistent with that reasoning. In other words you will deliver the National Grid connection hub under the SPR consents if either EA2 or EA1N goes ahead. As is well known EA2 is going ahead and it is highly likely that EA1N will as well.
- 4. National Grid is now seeking to use the limits of deviation under the Scottish Power consent which were put in place for the purposes of the AIS design even though it would have a significantly bigger footprint. FPC considers that there should have been a separate works plan for the GIS design showing a significantly smaller area for work number 41. Therefore FPC does not understand why National Grid needs the entirety of the area shown for the GIS design. National Grid's reasoning is not convincing.

- 5. Further this requested change highlights one of the areas where the draft DCO is deeply flawed, namely there are no requirements in relation to the size of the National Grid "substation" unlike the Scottish Power DCOs. It is clearly unacceptable for there to be these limits of deviation when there are no such requirements. This must be corrected as well as reinstating all the requirements and mitigation secured in the Scottish Power DCOs which are required.
- 6. This also creates a concern that National Grid through this change will effectively be able to expand the National Grid "substation" for other projects without needing planning consent. FPC will require there to be a specific undertaking that National Grid will not expand the "substation" without seeking planning consent.
- 7. It would be helpful if FPC could meet with representatives of National Grid to discuss these changes.

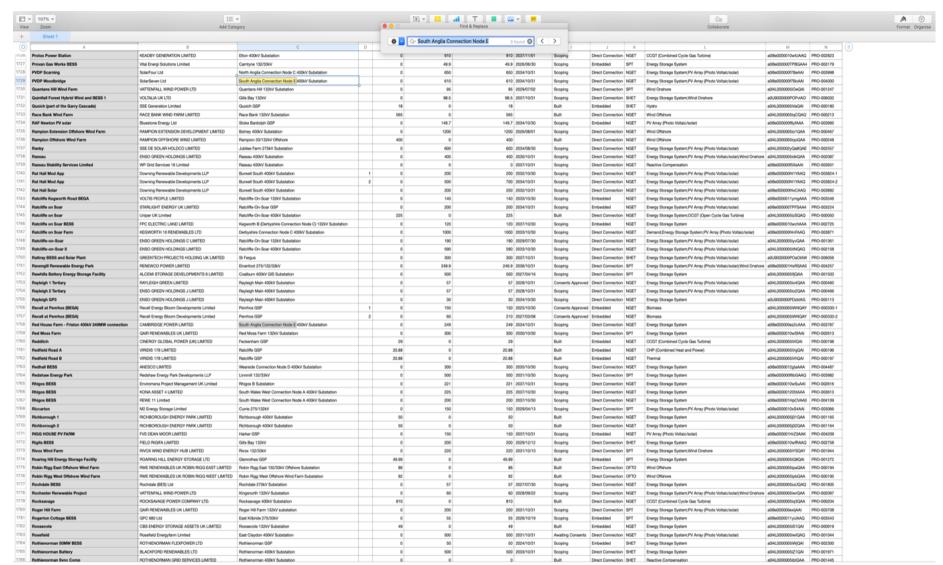
#### **APPENDIX B**

#### **TEC REGISTER ENTRIES**

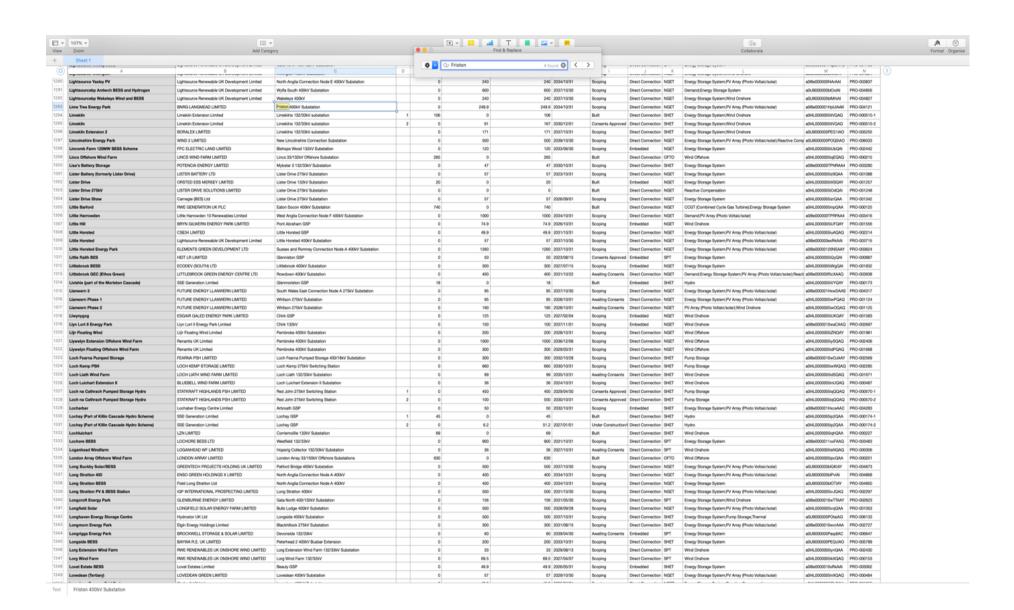




Text South Anglia Connection Node E 400kV Substation



Text South Anglia Connection Node E 400kV Substation



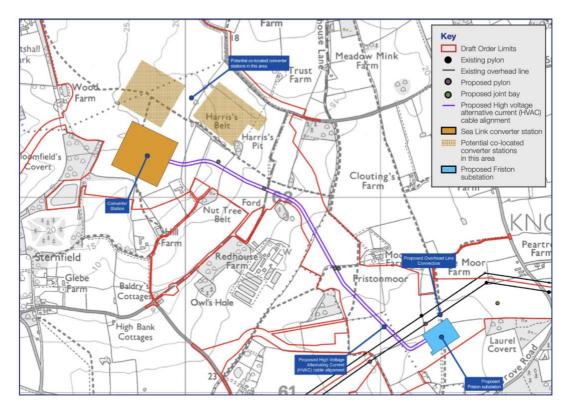
#### **APPENDIX C**

#### THIRD PROJECT AT CONVERTER STATION SITE

National Grid | October 2023

Project overview document 10-minute read

#### **Converter station**



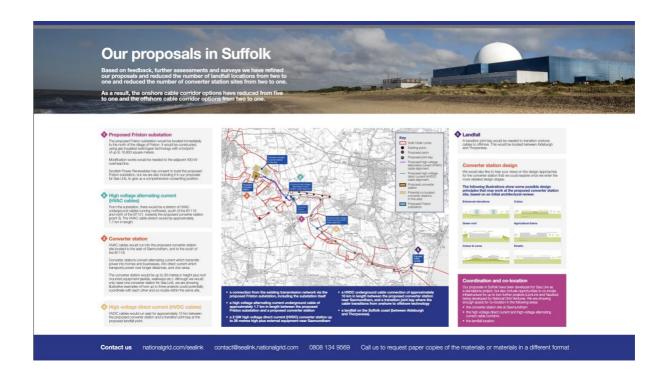
The high voltage alternating current cables would run into the proposed converter station site located to the east of Saxmundham, and to the south of the B1119. Converter stations convert alternating current which transmits power into homes and businesses, into direct current which transports power over longer distances, and vice versa.

The converter station would be up to 26 metres in height plus roof mounted equipment (aerials, walkways etc.).

Although a single converter station would be required for the Sea Link project, we are showing illustrative examples of how up to three projects could potentially coordinate with each other and co-locate within the same site.

We would also like to hear your views on the design approaches for the converter station that we could explore once we enter the more detailed design stages.

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#### APPENDIX D

#### **WORKING HOURS AND BASELINE NOISE LEVELS AT FRISTON**



## **ONSHORE CABLE STAGE**

# Code of Construction Practice Appendix 3 Construction Phase Noise and Vibration Management Plan

DCO Requirement 22(2)(c)

Project	East Anglia TWO Offshore Windfarm	Classification	Public
Doc. ID	EA2-LDC-CNS-PLN-IBR-000009	Reason for Issue	Issued for Review
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Prepared by:	Checked by:	Approved by:
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(d) the testing or commissioning of any electrical plant or cables installed as part of the authorised development; and

(e) activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property.

Further information is provided in Section 5.5 of the CoCP (EA2-ONC-CNS-PLN-IBR-000008).

#### 3.7.2 Core Working Hours

While the above permitted working hours apply across the project as a whole, the contractors working within the Onshore Cable Stage will be required to adhere to working within the more-stringent core working hours of 08:00 hours to 18:00 hours on weekdays (excluding bank holidays) and from 08:00 hours to 13:00 hours on Saturdays, as far as is reasonably practicable or unless otherwise permitted under Section 61 of COPA permission (See Section 10.2). Except in the case of an emergency, any work required to be undertaken outside core hours (not including repairs or maintenance) will be agreed with ESC prior to undertaking the work under Section 61 of COPA.

To maximise productivity within the core working hours, the contractors will require a period of up to one hour before (Monday to Saturday) and up to one hour after (Monday to Friday) core working hours for start-up and close-down of activities. This will include (but not be limited to) deliveries, movement to place of work, unloading, maintenance, and general preparation work. This will not include operation of plant or machinery likely to cause a disturbance to local residents or businesses. These periods will not be considered an extension of core working hours.

Certain operations such as earthworks are season and weather dependent. In these instances, the contractors will seek to extend the core working hours and/or days for such operations to take advantage of daylight hours, with the consent of ESC. Surveys (e.g. for ecological or engineering purposes) may also need to be carried out outside of core working hours. ESC will, thereby, retain control over the activities that can be undertaken outside the standard construction hours.

#### 3.7.3 Emergency and Essential Activities

Onshore construction activities will normally, therefore, be conducted during working hours of 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays with no construction works on Sundays or bank holidays, except in the case those circumstances set out in paragraph (2)(a) to (d) of Requirement 23 and also during emergency activities.

In the case of emergency works which are not specifically listed in paragraph (2) of the Requirement, approval will be required from ESC as to whether such works are essential. Examples of the type of work envisaged include where unexpectedly poor ground conditions, encountered while excavating, require immediate stabilisation

The term 'essential activities' relates to such works that, if not completed within a particular sequence or within a particular time frame, would be of detriment to the safety or construction of the Onshore Cable Stage and may include such activities as those that require continuous periods of operation and which have been assessed in the ES such as those activities set out in paragraph (2) (a) to (e). This would be particularly relevant for the completion of continuous processes predicted to last more than 12 hours, such as HDD works at the landfall

It has been agreed with ESC, that for the purposes of Requirement 23, 'essential' will also include the following activities, which can therefore be undertaken outside of the above working hours without prior notification to ESC:

- Fuelling of generator servicing pumping equipment etc, where the need for this was not known during normal working hours and fuelling is required to enable the continued operation of the equipment;
  - Response to failure of the following to enable return of service:
  - Electrical Generator to Welfare Facilities;
  - Site LAN/WAN;
  - Utility Power Supply;
- · Security patrols and response to unauthorised access;

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## 5. CONSTRUCTION NOISE AND VIBRATION MANAGEMENT SCHEME GOVERNANCE

Prior to the commencement of construction, an Environmental Clerk of Works (EnvCoW) will be appointed by the contractor to manage *inter alia* the implementation of the CPNVMP. Contact details for the EnvCoW will be submitted to stakeholders for their records prior to commencement of construction.

#### 6. LOCAL COMMUNITY LIAISON

EA2L is committed to providing clear communication to local residents and will ensure proactive community liaison is maintained, keeping local residents and businesses informed of the type and timing of any works. As outlined in the Code of Construction Practice (EA2-ONC-CNS-PLN-IBR-000008), a combination of communication mechanisms such as; mailshots, exhibitions, letters, newsletters, website updates, and parish council meetings will be employed to keep local residents and businesses informed.

A designated EA2L Community Liaison Officer (CLO) will manage and respond to any public concerns, queries or complaints in a professional and diligent manner as set out in the Project Stakeholder Communications Plan contained within the Code of Construction Practice (EA2-ONC-CNS-PLN-IBR-000008). The Complaints Procedure will be publicised, and complaints will be directed to the EA2L CLO. All enquiries will be logged, investigated and rectifying actions taken when deemed appropriate. Enquiries will be dealt with in an expedient and courteous manner. Details of complaints will be reported to ESC and SCC within two working days.

Key milestones will be reported via the SPR project website and mailshots will be sent to the relevant councils and other stakeholders to inform them of the ongoing works. The information provided will include as far as possible; a programme of works, the scope of the works, and a contact name, email address and telephone number in case of complaint or query.

In addition, EA2L will engage with the Wardens Trust and St Mary the Virgin Church in Friston, in accordance with the Stakeholder Communication Plan (EA2-GEN-CNS-PLN-IBR-000061). Information obtained from this engagement will be used to prepare a specific Noise Control Plan for this noise sensitive receptor. The Noise Control Plan will then be incorporated into the application for prior consent under Section 61 of COPA.

#### 7. BASELINE CONDITIONS

A baseline noise survey was undertaken at locations representative of the nearest NSRs as part of the ES. Volume 1, Chapter 25 Noise and Vibration of the EA TWO ES notes that noise measurements were carried out at NSRs in the surroundings of the onshore works.

Attended measurements were conducted by Royal HaskoningDHV at positions representative of NSRs between 26th June 2018 and 12th July 2018. The NSRs identified are residential properties. Due to the length of time between the 2018 survey and present, it is considered good practice to update the survey. A further survey was, therefore, conducted by SLR Consulting between 17th June and 2nd July 2024 at locations in the vicinity of the onshore cable works.

The survey locations undertaken in 2024 chosen as representative of NSRs relating to the Onshore Cable Stage in the assessment are presented in Table 7-1 and Figure 2 Environmental Sound Survey Locations.

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Table 7-1: Environmental Sound Survey Locations

I accessor ID	A STATE OF THE STA	Co-ordinates <sup>3</sup>		
Location ID	Location	Easting	Northing	
SSR2	Located in the grounds of Woodside Cottages	641834	261110	
SSR5	Located in back garden of Woodside Barn Cottages	641275	260638	
SSR6	Daytime - Located on Church Road opposite Walnut Tree Cottage	641417	260524	
	Night-time - Located on Church Road, close to Friston Village Hall	641313	260526	
CCR1	Located at the end of the drive of 1 Ness House	647336	261629	
CCR2	Located in the garden of building associated with the Sizewell Estate	647149	261971	
CCR3	Located on Red House Lane opposite Home Farm	647189	262374	
CCR4	Located on road adjacent to Halfway Houses	646223	262331	
CCR5	Located on field boundary with Hawsell's Farm	645502	261836	
CCR7	Located at the turning circle on the B1353 leading to Mansard Cottages	645533	260681	
CCR8	Located opposite 1 & 2 Church Lane	645315	260593	
CCR9	Located on Gypsy Lane	644713	260416	
CCR10	Located in garden located west of Suffolk Lodge	644463	260292	
CCR114		-	-	
CCR12	Located in the front garden of 1 Thorpe Road	644899	260922	
CCR13	Located adjacent to 25 Hawthorn Close	643853	260591	
CCR14	Located on Sloe Lane outside of Billeaford Hall	643277	260289	
CCR15	Located on the public highway within The Fitches estate	643420	260648	
CCR16	Located on the public highway within The Fitches estate	643420	260648	
CCR17	Located on land to the north but within Bulls Hall	642679	260460	
CCR18	Located in field to north of Manor Farm	642135	261381	
CCR19	Located south of property at Davenport off School Road	642548	261531	
LFR1	Located on public land to the north of Red House	647542	260202	
LFR2	Located on field boundary the north west of 9 Pilgrims Way	647222	260132	
LFR3	Located on land to north west of Black Cottage	646498	260303	
LFR4	Located approx. 28m north of Shell pit Cottages	646677	260948	

A mixture of attended and unattended measurements for up to a one-week period were undertaken. This approach ensured representative and repeatable environmental sound level measurements were obtained of the existing soundscape. All measurements followed appropriate practice for environmental sound level measurements in accordance with guidance contained within BS 7445-2:1991 and BS 4142:2014+A1:2019.

Measurements were undertaken between a height of 1.2m to 1.5m and in free-field conditions i.e. > 3.5 m from a reflective surface other than the ground.

The Sound Level Meters (SLM) were fully calibrated, traceable to national standards and satisfied the requirements of BS EN 61672-1:2013 for a 'Class 1' Sound Level Meter, and BS EN 60942:2018 for a 'Class 1' portable hand calibrator. The calibration of the SLM was checked before and after the measurements using a portable hand calibrator, with no drift being observed.

Table 7-2 presents the results of the environmental sound level measurements for the representative locations.

Table 7-2: Environmental Survey Baseline Noise Measurements

Location	Start Date	Period, T	L <sub>Aeq.</sub> T dB	dB	Median L <sub>A90,T</sub>
SSR2	17/06/2024	Daytime (7-days)**	39	31 - 81	33
		Night-time (7-days)**	42	29 - 75	19
SSR5	17/06/2024	Daytime (7-days)**	37	36 - 83	31

<sup>&</sup>lt;sup>3</sup> Co-ordinates relate to location of noise monitor rather than the residential building

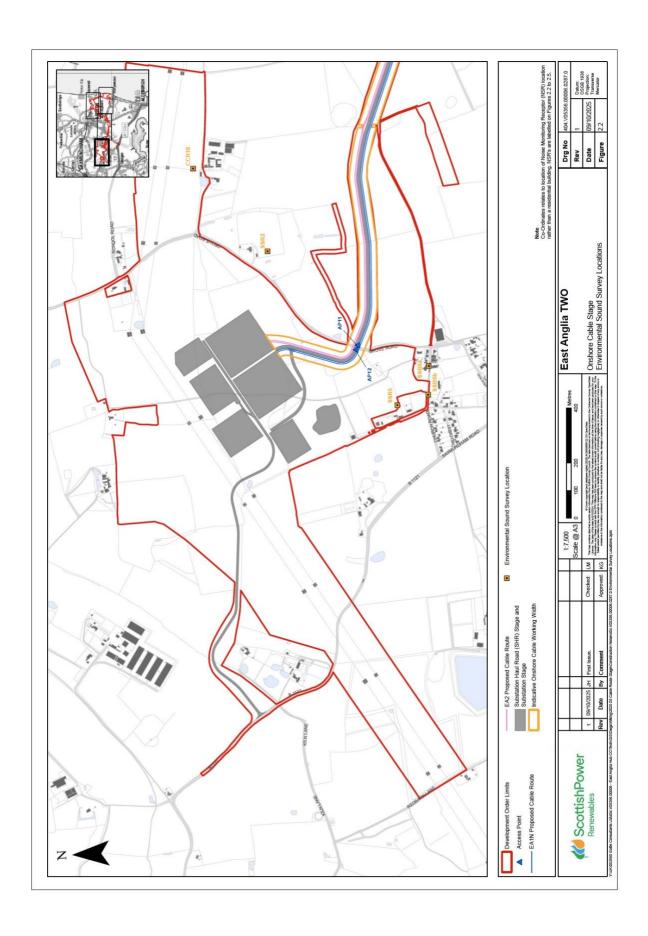
<sup>&</sup>lt;sup>4</sup> CCR11 was not surveyed due to restrictions on access, therefore an alternative but representative location was found. Due to the proximity and the similar sound climate, noise data obtained at CCR09 is considered representative of the sound climate experienced at CCR11.

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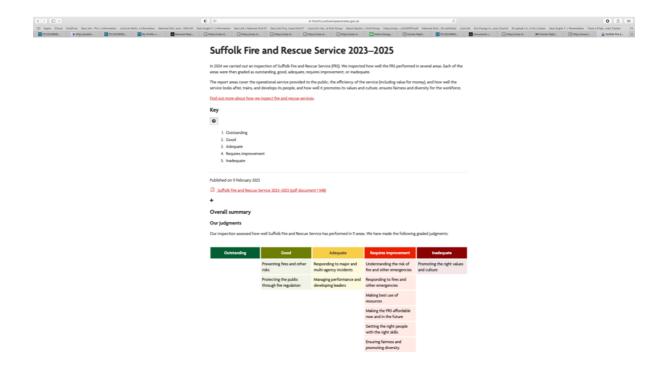
Location	Start Date	Period, T	L <sub>Aeq.</sub> T dB	dB	Median L <sub>A90,T</sub> dB
		Night-time (7-days)**	37	29 - 81	20
SSR6	18/06/2024	Daytime (1-hour)*	47	47 - 71	34
SSKO	02/07/2024	Night-time (30-minutes)*	33	32 - 49	27
CCR1	26/06/2024	Daytime (1-hour)*	42	38 - 72	36
CCKI	27/06/2025	Night-time (30-minutes)*	38	31 - 67	29
CCR2	26/06/2024	Daytime (1-hour)*	42	37 - 80	38
CCR2	27/06/2024	Night-time (30-minutes)*	31	35 - 66	28
CCR3	25/06/2024	Daytime (1-hour)*	51	42 - 76	35
CCR3	26/06/2024	Night-time (30-minutes)*	36	37 - 61	34
CCD4	25/06/2024	Daytime (1-hour)*	52	55 - 71	40
CCR4	26/06/2024	Night-time (30-minutes)*	56	34 - 88	32
2005	25/06/2024	Daytime (1-hour)*	41	39 - 69	38
CCR5	26/06/2024	Night-time (30-minutes)*	33	36 - 66	31
0007	25/06/2024	Daytime (1-hour)*	53	37 - 73	36
CCR7	26/06/2024	Night-time (30-minutes)*	30	30 - 69	27
	25/06/2024	Daytime (1-hour)*	51	45 - 85	37
CCR8	26/06/2024	Night-time (30-minutes)*	28	35 - 75	26
	24/06/2024	Daytime (1-hour)*	50	48 - 70	40
CCR9	27/06/2024	Night-time (30-minutes)*	29	26 - 68	21
	01/07/2024	Daytime (1-hour)*	45	56 - 64	37
CCR10	02/07/2024	Night-time (30-minutes)*	34	63 - 64	30
	24/06/2024	Daytime (1-hour)*	50	48 - 70	40
CCR11	27/06/2024	Night-time (30-minutes)*	29	26 - 68	21
SKE US	02/07/2024	Daytime (1-hour)*	43	69 - 96	34
CCR12	27/06/2024	Night-time (30-minutes)*	42	33 - 78	33
200000000	25/06/2024	Daytime (1-hour)*	53	39 - 70	36
CCR13	26/06/2024	Night-time (30-minutes)*	30	31 - 64	27
See	25/06/2024	Daytime (1-hour)*	44	40 - 72	36
CCR14	02/07/2024	Night-time (30-minutes)*	32	30 - 72	29
	01/07/2024	Daytime (1-hour)**	55	59 - 74	43
CCR15	02/07/2024	Night-time (30-minutes)**	40	48 - 54	28
	02/07/2024	Daytime (1-hour)*	41	40 - 46	35
CCR16	27/06/2024	Night-time (30-minutes)*	40	26 - 64	29
	25/06/2024	Daytime (1-hour)**	40	53 - 66	35
CCR17	26/06/2024	Night-time (30-minutes)**	42	48 - 52	34
	24/06/2024	Daytime (1-hour)**	45	63 - 72	34
CCR18	25/06/2024		29	37 - 46	20
->1000000		Night-time (30-minutes)**	39	48 - 58	32
CCR19	26/06/2024	Daytime (1-hour)**	36	40 - 45	35
	27/06/2024	Night-time (30-minutes)**			
LFR1	26th June	Daytime (1-hour)**	45	59 - 56	43
	27th June	Night-time (30-minutes)**	43	48 - 49	40
LFR2	26th June	Daytime (1-hour)**	38	51 - 65	34
	27th June	Night-time (30-minutes)**	37	44 - 46	35
LFR3	1st July	Daytime (1-hour)**	49	41 - 74	37
	2nd July	Night-time (30-minutes)**	27	28 - 54	25
LFR4	1st July	Daytime (1-hour)**	40	33 - 61	35
2000000	2nd July	Night-time (30-minutes)**	28	27 - 53	26

<sup>\*</sup> Recorded with 1-minute logging periods
\*\* Recorded with 15-minute logging periods
\*\*\*Based on logging period, only two measured values recorded which were identical to a whole decimal point.



#### **APPENDIX E**

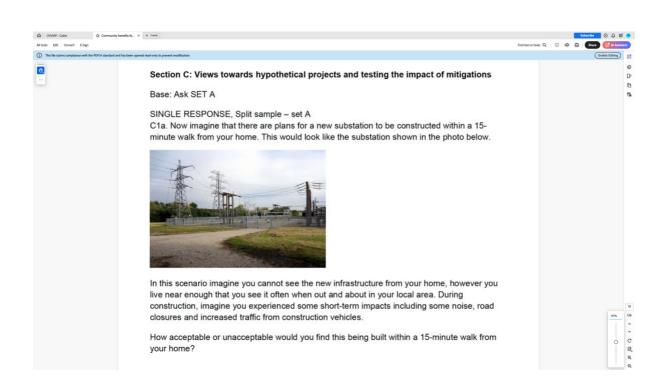
#### SUFFOLK FIRE AND RESCUE SERVICE REQUIRES IMPROVEMENT



#### **APPENDIX F**

#### WHAT DESNZ THINKS A SUBSTATION LOOKS LIKE





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