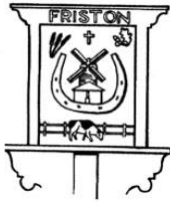


# FRISTON PARISH COUNCIL



**Friston Parish Council IP No. F4DB2AC56**  
**SASES IP No. FD73070EF**

Sarah Holmes  
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Date: 14 August 2025

BY EMAIL ONLY

Dear Madam

I write on behalf of Friston Parish Council and SASES in response to certain matters raised in the correspondence between the Examining Authority and National Grid, namely the letters from the Examining Authority to National Grid dated 8 July 2025 and 5 August 2025 and the letters from National Grid to the Examining Authority dated 24 July 2025 and 4 August 2025.

We welcome the Examining Authority seeking to clarify the situation in relation to the National Grid 'Friston' substation as set out on the third page of your letter dated 8 July 2025. As you are aware from our relevant representations this is a matter of concern to Friston Parish Council and SASES. A particular concern is that the hard fought mitigation recommended by the Examining Authorities for the National Grid, EA2 and EA1N substations and the Friston substations site, as subsequently consented by the Secretary of State, is not weakened by National Grid.

National Grid in its response dated 24 July to this part of your letter of 8 July and in its letter dated 4 August 2025 made a number of statements which we believe require comment/clarification at this time rather than waiting for the examination itself.

## **National Grid letter dated 24 July 2025**

The comments below have followed the numbering used by National Grid under the heading "National Grid 'Friston' Substation".

### **Section 1**

National Grid states that it *“has also been progressing the tender process to appoint contractors for the construction of the National Grid substation”* and that *“Construction of the National Grid substation is planned to start on site in spring 2026.”*

Our understanding is that in fact a contractor ( ) has been appointed to carry out some of the construction works which start in 2026. These construction works will be the groundworks not only for the EA2 substation but also for the National Grid substation/connection hub and the EA1N substation. We think it would be helpful for National Grid to clarify the exact position on contractors and their appointment.

National Grid refers to extracts from the Environmental Statement including *“The second scenario would only occur if the SPR projects do not proceed and Friston substation is no longer constructed under that consent. The second scenario is considered highly unlikely to occur”*.

In fact the SPR EA2 project is very much proceeding as residents can testify with significant construction noise and extended road closures/restrictions. The position with the SPR EA1N project may not be as certain. It might be helpful if SPR could be asked to comment directly on its intentions with regard to both projects. In addition it would be helpful if National Grid could clarify that the second scenario would not occur if EA1N does not proceed even though EA2 is proceeding.

The statement would also appear to be inconsistent with the land plans which show the areas to be compulsory acquired by National Grid at the Friston substation site in Scenario 2. These show the areas required for the EA2 and EA1N substations. Is it really the case that if the SPR projects do not go ahead that this area in the middle of the substation site would not be required and somehow will still be available for agricultural production? See paragraphs 22 and 23 of FPC and SASES Relevant Representations<sup>1</sup>.

Further this extract is inconsistent with the Book of Reference where it is stated at paragraph 1.2.1 – the Suffolk Onshore Scheme<sup>2</sup> that *“if Friston Substation has already been constructed under another consent only a connection into the substation would be constructed as part of the Proposed Project”* (emphasis added). This statement is quite different as it would allow National Grid to build the Friston substation under the terms of the draft Sea link DCO even if either or both of the SPR projects go ahead. It is very possible that National Grid has included further inconsistent statements on this issue in other parts of his application.

This is a critical issue given the overriding need for the existing mitigation to be preserved at Friston. Accordingly there needs to be a single definitive statement of the position with regard to scenario 2 which should be secured in the draft DCO. Alternatively a better approach would be for there to be two draft DCOs one for scenario 1 and another for scenario 2. Otherwise, given that scenario 1 represents the real world, a DCO based on the current draft would include a whole series of unnecessary rights and provisions which could cause confusion given the adjacency of the National Grid and SPR projects, where the SPR DCOs include the National Grid substation/connection hub.

## Sections 2 & 3

To the extent that the consents for the National Grid substation/connection hub including overhead line connection etc need to be adjusted then this could easily be accommodated by making changes to the EA2 and EA1N DCOs.

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<sup>1</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000583-sealink%20friston%20pc%20and%20sases%20relevant%20reps%20230625%20FINAL.pdf>

<sup>2</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000168-4.3%20Book%20of%20Reference.pdf>

## Section 4

National Grid state the detail as to differences in the design principles will be provided in September 2025. However a comparison of the Scottish Power EA2 and EA1N DCOs with the draft Sea Link DCO shows a clear difference in approach to the design principles which are to be secured. The Scottish Power DCOs have a defined “*substations design principles statement*” in Section 2 of the DCOs. This statement<sup>3</sup> is a document certified by the Secretary of State. This statement provides at paragraph 77 that “*The following design principles will be used to develop (and thereafter submit for approval) details of the onshore substation, National Grid substation..... in accordance with requirement 12 of the draft DCO*”.

In contrast in the draft Sea Link DCO paragraph 3 of Schedule 3 only refers to converter station design (not substation design) and then refers to “*Key Design Principles set out in the Converter Station Design Principles*”. This document is neither a defined term nor is it a certified document. The Sea link application does include Design Principles<sup>4</sup> that refer to the National Grid substation. However National Grid then includes an incomprehensible explanation (page 36) as to why the design principles which National Grid accepted for its substation in the Scottish Power’s DCOs do not apply to the same National Grid substation in the draft Sea Link DCO. This is all in the context where the maximum dimensions of the National Grid substation are not secured in the draft Sea Link DCO, whereas they are in the Scottish Power DCOs.

## Section 5

National Grid state in relation to mitigation measures that “*the majority of these measures were not specifically written for the small area where the SPR projects and Sea Link project overlap and do not necessarily have directly comparable measures in the SPR consents. The mitigation measures for each project aim to mitigate different effects, so are not comparable even if similarly worded.*”

We would suggest that National Grid are looking at this in the wrong way. It is not an issue of whether the projects overlap. Rather there are two sites where there will be permanent above ground infrastructure, namely:

- (i) the converter stations site to the south east of Saxmundham which will accommodate Sea Link, Lionlink and potentially a third project; and
- (ii) the substations site next to Friston.

These two sites will be connected by underground cables.

The mitigation necessary at the substations site at Friston (as determined by the examining authorities) does not change with the identity of the developer.

Also the use of the word “small” is questionable. National Grid under the draft Sea Link DCO wants to acquire a large area of land to the north of Friston much of which is necessary to mitigate the impact of the National Grid substation/connection hub. Again see paragraphs 22 and 23 of FPC’s and SASES’s Relevant Representations<sup>5</sup>.

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<sup>3</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010078-005274-ExA.AS-6.D11.V4%20EA2%20Substations%20Design%20Principles%20Statement.pdf>

<sup>4</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000204-7.12.1%20Design%20Principles%20-%20Suffolk.pdf>

<sup>5</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000583-sealink%20friston%20pc%20and%20sases%20relevant%20reps%20230625%20FINAL.pdf>

National Grid also refers to “*mitigation is secured in the numerous outline management plan submitted with the application*”. Whilst a number of outline plans are listed in Schedule 19 of the draft DCO as Certified Documents, very few of these plans are defined terms. Further a significant number are duplications since they essentially deal with the same issue both in Suffolk and in Kent. Also there are a number of key omissions most notably an outline operational drainage management plan. This is an essential plan given the high flood risk at Friston. There is such a plan defined and secured in the Scottish Power DCOs respect of the substations site at Friston. Whilst the offshore elements of Sea Link and the Scottish Power projects are not directly comparable, it is instructive to compare the onshore outline plans set out as defined terms in Section 2 of the EA2 DCO<sup>6</sup> (and also listed in Schedule 17) with the outline plans in the list of documents in Schedule 19 of the draft Sea Link DCO.

**National Grid letter dated 4 August 2025 and Examining Authority letter dated 5 August 2025**

National Grid now admits that its approach is complex and difficult to understand. It is also confusing and arguably National Grid has confused itself given the inconsistency in its documents. This is compounded by the fact that such complexity and difficulty is in reality unnecessary as the Scottish Power EA2 project including the National Grid substation/connection hub is going ahead and this has been the case for some time. We have further views on this issue but we do not think it would be helpful to set those out here.

In its letter of 24 July 2025 National Grid stated that scenario two “*is considered highly unlikely to occur*”. In other words Scenario one is highly likely to occur. In this 4 August 2025 letter Scenario one has become “*even more certain*”. The question is what is “*even more certain*” than highly likely? Are we not now at a point where “*even more certain*” than highly likely means certain?

In this context we note that the Examining Authority has asked for confirmation on when a final decision will be made on which scenario will be followed by National Grid. We understand why you have asked this question and why you consider you will have to examine both scenarios unless you receive such confirmation on when a final decision will be made. However examining both scenarios will add to the already intolerable burden of multiple NSIPs on our community where we have little resource to address them, rendering these processes ever more unfair and oppressive.

Yours sincerely



On behalf of Friston Parish Council  
On behalf of SASES

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<sup>6</sup> <https://www.legislation.gov.uk/uksi/2022/433>