

FRISTON PARISH COUNCIL



NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

FRISTON PARISH COUNCIL - [REDACTED] & SASES - IP [REDACTED]

DATE: 11 JANUARY 2026

DEADLINE 3 – COMMENTS ON RESPONSES BY NATIONAL GRID TO FPC & SASES WRITTEN REPRESENTATIONS ([REP2-034](#))

In this document:

- references to Friston Parish Council (FPC) shall be deemed to include references to SASES; and
- Ref are the reference numbers used by National Grid in its responses (REP2-034).

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Cumulative Impact

Ref 7 - Sufficient information is available

Ref 8, 9, 10 & 11 - As is clear from the TEC register entry for Red House Farm (entry number 1758 - Appendix B of FPC's written representations ([REP1-301](#))) the Friston connection is one and the same thing as the South Anglia Connection Node. NESO makes its recommendations in close collaboration with NGET (as the owner of the transmission system) together with the developer based on the location of the developer's proposed project. It does not act unilaterally in a vacuum. It is suggested that NESO gives evidence in the examination.

Ref 12 - see Ref 7 - Is National Grid saying that Sealink will have no impact on the landscape mitigation required under the EA2 and EA1N DCOs? National Grid's response is confused. It is to be noted that National Grid admits that it is in fact taking account of the effect of further development at Friston.

Ref 16, 17, 18, 20, 21 – National Grid admits that it is working in collaboration with Helios. The location of the Helios project is known so that the direction from which the AC cables will come from the Helios project to the National Grid connection hub is also known. In relation to all future projects given National Grid's extensive knowledge and engineering expertise it is incorrect to say information does not exist. It is just incomplete which is no bar to an assessment. In relation to the "third project" National Grid has already considered some of the effects of the converter station at Saxmundham by including it in its plans.

Ref 22 – The “separation” between NGV and NGET is a convenient legal fiction. They are part of the same group owned by National Grid plc which appoints its directors and determines its capital structure. It is highly likely that some of employees of each of NGV and NGET will have been employees or secondees of the other at some point in their careers.

The purported influence can hardly be considered as “profound” when separate AC cable routes are being proposed in different locations for Sealink and Lionlink with no consideration of a cable route for a third convertor station at Saxmundham.

Ref 23 - It is noted that National Grid admits that the “developments cited by SASES may be within the ZOI of the proposed project”.

Ref 24 - See Ref 8 above

Ref 25 - National Grid is in denial as to the effect of the ever increasing number of projects proposed to connect to Friston on the residents of Friston who have already had to deal with blight and uncertainty for eight years with no prospect of this coming to an end.

Ref 26 – National Grid’s reasons for not pursuing what is self-evidently a sensible solution (i.e. all AC cable routes being installed at the same time) are unconvincing.

Ref 27 – Section 9 (2) does not exist in isolation. Environmental impacts have also to be taken into account as well.

Development Consent Order

Ref 28, 29, 30, 31 and 32 – self-evidently the National Grid connection hub will only be delivered once. There is no need for National Grid to have an “end to end” consent for Sealink where the connection point has already been consented under another DCO and construction started. The question is why should the mitigation for this connection hub be different depending upon the identity of the developer? There needs to be complete clarity that the mitigation will be the same. For example National Grid seems to be unaware of Requirement 15(2) in the EA2 and EA1N DCOs which requires all landscape planting which dies or is seriously damaged within 10 years after planting to be replaced. The response to the EXQ1GEN 11 is awaited.

Ref 33 – Mitigation of Flood Risk - it is noted that National Grid “anticipates that the drainage approach.....will be implemented by SPR and NG in all scenarios.” (emphasis added) Given the advanced state of the Discharge of Requirement process for EA2 there seems no reason why National Grid cannot commit to the operational drainage management plan which will be approved pursuant to the EA2 DCO.

Ref 34 and 35 - Scenario 2 – the consents and land rights for the National Grid connection hub already exist in both the EA2 and EA1N DCO’s. It is a straightforward legal mechanical exercise for those to be transferred to National Grid as provided for in those DCOs. No one is denying that the National Grid connection hub is an essential component of Sealink. The simple point is that the necessary consents already exist and can be easily transferred to the extent necessary.

Landscape and Heritage

Ref 36 - See comment at ref 8 etc above.

Flood Risk

Ref 37 - see comment at ref 33 above.

Noise

Ref 38, 38, 39 and 40 - whilst FPC welcomes that National Grid has at last after several years recognised the existing mitigation in respect of working hours for the connection hub the problem remains in respect of the remainder of the project as construction noise will travel from the remainder of the project particularly from the DC and AC cable routes.

Ref 41-45 - FPC notes the reassurances given by National Grid in respect of noise levels and infrequency but these are in no way secured in the DCO. Furthermore National Grid has stated that noise from the operation of the substation is only “negligible and not significant” during the “normal operation of the substation” (emphasis added). In addition presumably as more and more connections are made at the National Grid connection hub the level of frequency will increase? A community should not be expected to rely on the unsecured assurances of National Grid, because if there were to be a problem what recourse would the community have?

Traffic

Ref 46 - FPC maintains the position that the B1121 from Benhall through Sternfield and Friston to the A1094 is unsuitable for HGV and construction traffic. However FPC notes the National Grid’s Comments on the Local Impact Report submitted by Suffolk County Council ([REP2-026](#)) ref 11.125 and its reliance on the Outline Construction Management and Travel Plan ([CR1-041](#)). However this plan does not address the concerns of FPC not least as there are no restrictions on the use of the multiple access points on the B1121 (S-APs 10 and 12 and S-MAP 3) or on Grove Road (S-AP 8 and 9 and S-MAP 1). Further the working hours in this plan require alignment to the working hours permitted under the EA2 and EA1N DCOs.

Ref 48 – National Grid has not addressed the concern that the excessively sized bell mouth (access point S-AP-12) accessible via the Saxmundham Road and Aldeburgh Road on the B1121 (SRLs 8&9) will be used for construction activity when the National Grid connection hub has to be extended for future projects. National Grid has not explained adequately why HGV access to what is meant to be an operational access road for maintenance is necessary. Furthermore even if it is necessary given the infrequency of use there are far less intrusive means of designing this access from a landscape perspective.

Safety

Ref 49-52 - In its response National Grid states that fires are a “rare” risk . In its responses to SASES’s and FPC’s relevant representations (now [REP2-022](#)) it was stated that they are “relatively rare” – paragraph 77 of Applicant’s Responses To Selected Relevant Representation Responses Table 6.8. Could National Grid please clarify? National Grid also states that “rigorous maintenance and inspection programs and safety protocols” exist. The mere existence of protocols does not stop catastrophic incidents as the substation fire at the site serving Heathrow Airport demonstrated. Overall whilst FPC notes the assurances given it is concerned about National Grid’s complacency in saying “There is no risk of fire spreading to vegetation, crops or houses” (emphasis added)- paragraph 77 of Applicant’s Responses To Selected Relevant Representation Responses Table 6.8 (REP2-022). It is difficult to believe there is “no risk” given the proximity of very dry vegetation in periods of low rainfall.

Tourism and socio-economic impacts

Ref 53 - This response demonstrates how little Sealink will contribute to the local economy. Care should be taken in relation to references to “the East of England” as past experience has

demonstrated this extends remarkably far north, west and south and in no way can be regarded as local.

Ref 54 -57 - National Grid places great reliance on Government guidance which as evidenced in FPC's written representations ([REP1-301](#)) is deeply flawed. In addition National Grid seeks to distance itself from that guidance on the basis it is a matter for DESNZ. However National Grid was a key contributor to the formulation of that guidance. Did National Grid point out that "substations" vary greatly in impact particularly when in reality they become strategic connection points for a multiplicity of projects with ever-increasing environmental impacts? Furthermore did National Grid point out that the image used by DESNZ for its research was completely unrepresentative of the major "substations" which National Grid was proposing to develop? There is no recognition of the damage that has been done and will continue to be done to the mental and financial well-being of the Friston community.

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Ref 1-5 – FPC notes that National Grid admits that the newsletter it circulated to thousands of people in the local community did not accurately represent its intentions with regard to the Sealink project. It should be noted that that same newsletter on its first page states that "No new pylons would be built in Suffolk as part of Sealink".

END