

# FRISTON PARISH COUNCIL



## NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

FRISTON PARISH COUNCIL - IP NO [REDACTED] & SASES - IP NO [REDACTED]

Date: 19 JANUARY 2026

### DEADLINE 3A - REPRESENTATIONS RELATING TO CR1

#### 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 mitigation has in certain key respects been found to be only just sufficient on balance.”* (emphasis added)

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

1. This document is Friston Parish Council's and SASES's (together referred to as FPC below) combined relevant and written representations in relation to CR1. Whilst FPC has a number of concerns about the implications of this change (as set out below) they arise from the fact that National Grid is seeking to compulsorily acquire more land than it needs for a GIS substation – see paragraph 10 below.
2. FPC engaged in the consultation process for CR1. The principal concern was in relation to Change 2 in part resulting from the confusion between:
  - a. the requirements set out in the EA2 and EA1N DCOs (as set out in Part 3 of Schedule 1 paragraphs 12 (7), (8), (12) and 15(a) and (b); and
  - b. the limits of deviation set out in Article 5 of the draft Sealink DCO – REP3-006
3. National Grid's response to the comments made in the consultation is set out in its Consultation Report CR 1-069. Its response in relation to change 2 is set out on pages 27 and 28. This response does not specifically address the concerns of FPC. For ease of reference FPC has attached its response to the consultation in Appendix A below.

4. It will be noted that FPC felt it would have been helpful if National Grid had met with representatives of FPC to discuss the change. National Grid did not take up this offer. That has meant that any “misconceptions” (as National Grid has put it) could not be resolved ahead of the examination of CR1.
5. Accordingly FPC’s concerns as set out in its consultation response remain.
6. Principally it would appear that National Grid are seeking to secure limits of deviation in terms of area/footprint for a GIS “substation” which are far larger than those which are permitted under the EA2 and EA1N DCOs. The area shown on the Change 2 work plans as the Proposed Deviation is a similar size (but might be even larger) than that permitted for an AIS substation under the EA2 and EA1N DCOs. Under those DCOs (as set out in Part 3 of Schedule 1 paragraphs) 15(a) and (b) the

*“....compound area for the National Grid substation must not exceed –*

  - a. *where the AIS substation arrangement is used, 44,950 m<sup>2</sup>; and*
  - b. *Where GIS substation arrangement is used, 16,800 m<sup>2</sup>.*
7. In part the reason for the difference was that, although the AIS substation has a larger footprint, it was substantially lower at 6m therefore would have a significantly lower landscape impact than a GIS substation at 16m. In essence the greater landscape impact of a GIS substation was offset by its smaller footprint.
8. FPC is concerned that change 2 will allow the development of a far larger National Grid substation/connection hub than that which was consented under the EA2 and EA1N DCO’s after a detailed examination of landscape impacts during a nine-month examination period. It must be clear that the National Grid substation/connection hub must be no larger than that permitted under the EA2 and EA1N DCOs. To grant a DCO which allows a larger National Grid substation/connection hub to be built would be irrational, not least given the comments of the examining authorities set out above.
9. There is no doubt that the National Grid connection hub will be used as the connection point for a number of proposed projects. Those projects will require the substation/connection hub to be expanded. Change 2 may allow that expansion to take place without the need for any further consent. This should not be permitted.
10. Therefore compulsory purchase of land should be limited to that which National Grid actually needs for a GIS substation to serve EA2, EA1N and Sealink alone.

**END**

## APPENDIX 1

### NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

FRISTON PARISH COUNCIL - IP NO [REDACTED] & SASES - IP NO - [REDACTED]

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.

**END**