

FRISTON PARISH COUNCIL



NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 10th February 2026

DEADLINE 4 - ISH2 - WRITTEN POST HEARING SUBMISSION

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)

“28.4.5the 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)

INTRODUCTION

1. This document is Friston Parish Council's and SASES's (together referred to as FPC below) combined submissions following ISH2.
2. For ease FPC has used the term “National Grid substation” even though that infrastructure is a hub or node as acknowledged by NESO in its TEC register (see REP1-301 Appendix B) and NGV in their LionLink PEIR - page 10 of Non-Technical Summary.
3. References to EA2 means both EA2 and EA1N unless the context otherwise requires.
4. FPC has only commented on the agenda items which are of particular concern to it. Submissions have been made on agenda items in the order in which they appear in the agenda and not in the order in which they were heard.

ISSUE SPECIFIC HEARING 2

Agenda item 9 – Landscape and Visual

5. We noted the comments from East Suffolk Council's Arboriculturist. Planting is very difficult to establish in East Suffolk due to lack of rainfall but also where there is a clay soil waterlogged ground which can rot roots in winter. Also it is just not a question of survival but growth rates. FPC is concerned that although National Grid is committing to lifetime maintenance, the word "maintenance" or "adaptive maintenance" is not sufficiently precise and there need to be very specific requirements to define what this means. This was the reason why requirement 15(2) was included on the face of the EA2 DCO.
6. We support ESC's concern in relation to the major adverse effect on landscape in respect of Viewpoint 5 (APP 209). Not only will the landscape mitigation do very little for many years it will never completely screen what is a huge piece of industrial infrastructure. This infrastructure will be particularly visible on the B1121 going west from the junction with Kiln Lane. The land here is higher than the viewpoint and will provide an exceptionally good view for pedestrians, cyclists, horse riders and car drivers of the convertor station which will be completely out of scale with and dominate the once rural landscape.
7. The Landscape Management Plan for the substations site which is required under the EA2 DCO is due for discharge by ESC on 5th February 2026 (DC/25/4821/DRR). Therefore National Grid should use this plan for the substations site rather than seeking to reinvent the wheel and in doing so waste the time of local authorities and FPC which has engaged in the discharge process. Colin Innes of Shepherd and Wedderburn representing SPR clearly set out the detailed process in the EA2 DCO noting it was heavily secured. FPC reminds the ExA that this plan and the associated requirements is part of the "*only just sufficient*" mitigation.

Agenda Item 10 - Design

8. Michael Mahony for FPC was not available in the afternoon of Friday 30 January. Accordingly Mr Burton helpfully raised the particular issues which FPC has in relation to design.
9. First whilst the design of the Converter Station is clearly secured on the face of the DCO this is not the case with the National Grid substation. Furthermore the design process is not as robust as it is in the EA2 DCO. The design for the EA2 and National Grid substations which is required under the EA2 DCO is due for Discharge by ESC on 6th February (DC/25/4827/DRR) There was an extended process of engagement with the local community in relation to this design including community workshops in which National Grid participated. Therefore National Grid should use this plan for the substations site rather than seeking to reinvent the wheel and in doing so waste the time of local authorities and FPC which has engaged in the Discharge process.
10. Second given the dark skies at Friston the EA2 DCO contains requirements both in relation to construction lighting and operational lighting on the face of the DCO - see requirement 22(2)(j) and 25 in respect of operational lighting. These requirements should be replicated in the draft DCO.

Agenda Item 11 - Cultural Heritage

11. The substation site is ringed by Listed Buildings including the Grade II* Parish Church. In the EA2 examination it was found that the damage to cultural heritage including the setting of heritage assets was at the upper end of “***less than substantial harm***”. Therefore any expansion of the National Grid substation for future projects, LionLink, Helios Solar Farm and the other projects on the NESO TEC register can only worsen that harm.

Agenda Item 13 – Traffic and Transport

12. Steve Merry the highways expert (Transport Policy and Development Manager) at Suffolk County Council mentioned the potential cumulative impacts of the Helios project. National Grid confirmed that they would be meeting Helios in three weeks' time. The purpose of those meetings can only be to discuss the cumulative impact of Sea Link with Helios.
13. Both of the options to make Benhall Bridge fit for AILs will result in many days of road closures. The outline Construction Traffic Management Plan states “***in the case of exceptional circumstances where the proposed routing to the site is compromised due to an incident or road closure then it is considered acceptable for HGVs to be redirected via an alternative route.***” The B1121 through Friston (for access to S-RL9 and S-BM11) is designated by Sea Link as an HGV route despite its unsuitability. National Grid has said this to be solely for the purposes of the pylon works just to the west of Friston which are very limited in terms of construction time and requiring 2 HGV vehicle movements a day. The Outline Construction Traffic Management Plan needs to clearly state that the B1121 cannot be used in exceptional circumstances and in other circumstances can only be used for 2 HGV movements a day.

Agenda item 14-noise and vibration

14. The subject was extensively discussed in the EA2 Examination and was addressed in a number of issue specific hearings. Part of the issues discussed was the exceptionally quiet baseline noise levels at Friston. This is what led to the stringent noise requirements in the EA2 DCO not just in relation to noise levels but also in relation to testing. Requirement 27 applies to and references the National Grid substation in respect of its “***standard operation***”. This was included on the basis that in “***standard operation***” the National Grid substation would not emit any noise although there were concerns about the noise from the operation of switchgear in non-standard operation. For reasons which were not clear, the ExA did not address this issue. Rupert Thornely Taylor, the noise expert for SEAS in this Examination was also SASES expert in the EA2 Examination and you will note the reference to “***tonal penalties***” in requirement 27(2) in respect of the EA2 and EA1N substations. The Friston community should not lose the benefit of a noise requirement in respect of the operation of the National Grid substation. Furthermore given the expansion of the National Grid substation for LionLink and other projects with the accompanying increase in switchgear and the corresponding increase in noise from the switchgear in non-standard operation, National Grid's assessment of noise from the substation should be secured in the DCO.

Agenda item 16 – health and well-being

Core working hours

15. The working hours permitted under the EA2 DCO are already very extensive, being 7am to 7pm on weekdays and 7am till 1 pm on Saturdays. The local community strongly resisted any Saturday working but was refused. The ongoing works at the substation site since 2025 have already caused significant disruption given the large amount of heavy plant and machinery. What was particularly intrusive were reversing alarms and recorded messages which could be very clearly heard over significant distances. Furthermore given the need to constantly de-water the site, diesel pumps were operating seven days a week which has caused significant disruption to residents who live near the site. The thought of no respite from what will remain significant construction noise 12 hours a day every day will further depress many residents.

16. Whilst National Grid has returned to the EA2 working hours for the substation and the pylon works it has not appreciated the effect of the EA2 working hours, which extend to the entirety of the order limits at the substations site. Therefore in order for Friston residents to have the benefit of the working hours which they currently have, no works should take place within the substations site order limits except in accordance with the EA2 working hours.

17. Through effective workforce management and given the existing extensive working hours National Grid should be able to meet its construction timetable. There are after all a number of exceptions to the EA2 working hours. Furthermore by not having Sunday and Bank Holiday working National Grid will be able to make significant savings through the avoidance of premium rates for employees.

Light pollution effects

18. The impact of light pollution was recognised in the EA2 examination hence the design requirements in the EA2 DCO. Light pollution should be addressed in the Sea Link DCO.

Agenda Item 20 - Cumulative Effects

Helios Solar Farm

19. National Grid admitted that it is holding regular meetings with other developers including with Helios Solar Farm. The location of this farm is known, therefore the AC cable route is known. This AC cable route will have an impact on landscape mitigation in the way that Sea Link and LionLink will have impact on the landscape mitigation at the substation site at Friston. Further it is known that the National Grid substation will need to be expanded in the same way as it is for LionLink. Details of that expansion are shown in the LionLink Statutory Consultation document, General Arrangement Plans and Drawings, Section Number 02-01 and attached to this submission at Appendix 1.. Therefore some of the cumulative effects of Helios can be assessed.

20. National Grid refer to information relating to Helios being confidential. In doing so National Grid implicitly admitted that information exists which would enable some cumulative effects to be assessed. Whilst National Grid denied they could assess cumulative effects of the AC cable route referring to the lack of publicly available information, they made no such comment in relation to the expansion of the National Grid substation. It is self-evident that expansion of the National Grid substation will have further significant landscape impacts given the potential height of the substation at 16m.

21. In terms of confidentiality it is submitted that the information which exists which is allegedly confidential may not in fact have the nature of confidence. Rather it is information which Helios does not want to disclose which is something quite different. There is a strong public interest in as much information as possible about the Helios project being made available so that cumulative effects can be assessed.

22. Not considering the cumulative impacts of Helios in this Examination results in a lopsided and asymmetric situation. Developers discuss cumulative impacts privately so they can assess the cumulative impacts on their projects, and yet cumulative effects which impact the environment are not addressed in an Examination process which is meant to consider cumulative impacts.

Single AC Cable Route for Sealink and Lionlink

23. LionLink is proposing two options for the AC cable route from the converter stations site to the substations site. One is the same route as Sea Link and the other, is further east to the other side of High House Farm. If LionLink selects the eastern route this will significantly increase the cumulative environmental impacts including from extended construction (noise, traffic, dust) and disruption of landscape mitigation.

24. To reduce the cumulative impacts of LionLink and Sea Link, AC cable ducts for LionLink should be installed alongside the AC cables for Sea Link. The benefits of installing cable ducts for a future energy project to reduce cumulative impacts are well understood and appreciated. This approach was adopted for the EA1 and EA3 projects which connect at Bramford, as well as the EA2 and EA1N projects which connect at Friston. No doubt National Grid will state that NGET and NGV are two separate companies. However that is no bar to cable ducts for a future project being installed alongside a current project. All that is required under Government Guidance on associated development is for the Developers to be “related”. Rather than recite the arguments here FPC would point to article 41 of the National Infrastructure Planning Handbook – Fourth Edition. In the EA2 DCO this approach was secured in Requirement 42 in Part 3 of Schedule 1. National Grid referred to “coordination” being a key design principle but that is inadequate to secure the installation of AC cable ducts for Lionlink.

Agenda Item 21 – The draft Development Consent Order

25. FPC has made extensive comments on the draft DCO in its comments on National Grid's responses to EXQ1 which have also been submitted at Deadline 4.

Article 10

26. As previously submitted National Grid has created a confused position in terms of mitigation at Friston by proposing a draft DCO, which in circumstances which are not entirely clear, will apply to the substations site. At the heart of the problem is that the draft DCO reduces the requirements and mitigation at the substations site which is secured in the EA2 DCO, mitigation which the examining authorities for EA2 and EA1N deemed to be only “just sufficient”. In this context and as the ExA recognises, the effect of article 10 and in particular article 10(3) needs to be carefully considered.

27. It is understood in complex planning consents that a consent for one development might inadvertently conflict with a consent for another development. However the situation at the substations site at Friston is quite different and possibly unique. National Grid is seeking consent for the same site excluding areas specifically reserved for the footprint of the EA2 and EA1N substations. The requirements and mitigation in the EA2 and EA1N DCOs have been established for the site as a whole. This is one reason why the DCOs for EA2 and EA1N are identical. National Grid by seeking a separate consent for the same site but with reduced requirements and mitigation has very substantially increased the possibility of a conflict between the draft DCO and the EA2 and EA1N DCOs. In such circumstances the onus should be on National Grid (particularly given all its resources) to avoid any conflict between the

extant EA2 and EA1N DCOs, and the draft DCO. Therefore to the extent there is a conflict then the EA2 and EA1N orders should take precedence. The wording “*and will not prevent the authorised project being carried out or used or any other power or right under this Order being exercised*” in 10(3) should be removed. Article 10(3) should be re-drafted so that in the event of any conflict the EA2 and EA1N DCOs take priority.

28. As noted in ISH2, the EA2 and EA1N DCOs do not have an equivalent provision to Article 10¹. Therefore the position in the case of conflict under those DCOs is unclear. Accordingly by the EA2 and EA1N DCOs taking priority the issue regarding conflict should not arise in respect of the coexistence of those projects with Sea Link.

Use of the words “substantially” and “generally”

29. The use of these words in qualifying National Grid’s commitment to comply with various outline and other documents was raised in the hearing.

30. If there is need for any “discretion” that should lie with the approving authority alone and not with National Grid.

END

APPENDIX 1 follows on page 7

LionLink Statutory Consultation January – March 2026
General Arrangement Plans and Drawings
Section Number 02-01

¹ Something which National Grid were unaware of reflecting its general lack of regard for the terms of the EA2 and EA1N DCOs.

