

# FRISTON PARISH COUNCIL



## NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 10 March 2026 (submitted 12 March 2026)

### DEADLINE 5 - RESPONSES TO EXQ2

#### 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 responses to EXQ2.
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) 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. Responses are set out below using the unique reference number for each question

**2GEN5&6** – FPC notes that these questions have been directed to National Grid and the local authorities, however the focus on the detail of Requirement 3 has meant that fundamental “design” requirements in the EA2 DCO have been overlooked namely,

- the height of the substation;
- the footprint of the substation; and

- the need for it to be a GIS substation.

No criticism of the local authorities it suggested but this oversight is a consequence of National Grid's wrongheaded approach to the drafting of the DCO with respect to the substations site.

The design of the National Grid substation at the substations site at Friston has either been approved by East Suffolk Council under the discharge of requirements process for EA2, or is very close to approval, following an extensive design process in accordance with the EA2 DCO, including workshops with the local community which National Grid attended. That design should be the final design regardless of which DCO the National Grid substation is built under.

Amendments have been made to paragraph 3 (Detailed Design) of Schedule 3 of the draft DCO submitted at Deadline 4 (REP 4–217 & 218) in an attempt to address this issue. However those amendments do not ensure that the detailed design approved under the EA2 DCO in respect of the National Grid substation are fully replicated under the draft Sealink DCO.

Accordingly the amendments are defective in a number of respects relative to the design requirements for the National Grid substation in the EA2 DCO as follows.

In the EA2 DCO the height of the GIS National Grid substation is not to exceed 16m above finished ground level - Paragraph 7(b) Part 3 of Schedule 1. However as previously submitted National Grid is now seeking to exclude from this height limit "*roof mounted equipment*" as set out in Clause 5 of the draft DCO. Further there is no definition of roof mounted equipment so it could be of any size. This exclusion should be deleted.

The National Grid substation in the draft DCO is of GIS design, but there does not appear to be any reference to this type of design in the draft DCO. The height of 16m was only permitted in the EA2 DCO for a GIS substation based on the fact that it would have a much smaller footprint than an AIS substation (maximum height 6m) and therefore in theory less landscape impact notwithstanding its height.

Accordingly requirements should be included in the draft DCO that:

- the substation is to be of GIS design and therefore will not include any AIS equipment (this also goes to the noise issue with AIS equipment). Currently the description of Work No. 1B – new Substation at Grove Wood, Friston, Suffolk set out in Schedule 1 Part 1 does not reference GIS;
- the footprint on the GIS substation is not to exceed 16,800 m<sup>2</sup> – as required in the EA2 DCO - see paragraph 15(b) of Part 3 of Schedule 1.

Turning to the language of the amendments, they are not sufficient to guarantee that **all** the design requirements which have been approved by ESC are carried forward. Additional wording should be included at the end of paragraph 3 (2)(a) as follows,

*“and generally in accordance with all conditions, requirements etc set out in such documents and the EA2 DCO insofar as they relate to the Suffolk Substation”*

It is unclear why paragraph 3(2)(b) is necessary.

**2GEN10** – as mentioned in the response to questions 2GEN5&6 the exclusion of roof mounted equipment in respect of the height of the National Grid substation should be deleted.

**2GEN26** - National Grid needs to include in the draft DCO all the requirements in Part 3 of Schedule 1 of the EA2 DCO insofar as they relate to the National Grid substation and the substations site. These requirements were considered necessary by the EA2 Examining Authority given the environmental impacts at the substations site after a nine month examination period and form part of the DCO granted by the Secretary of State. FPC made a submission at Deadline 4 setting out in detail how defective the draft DCO is in addressing environmental impacts at Friston, given the failure to clearly replicate all the requirements in the EA2 DCO.

The specific wording of those requirements is set out in Part 3 of Schedule 1. Some consequential amendments will be necessary but it is hoped this is not beyond the capabilities of National Grid.

If this wording is not it adopted there is a serious risk that some environmental impacts at Friston will not be properly addressed in the draft DCO. For example whilst FPC has picked up the issues concerning height, footprint and GIS technology for the National Grid substation, there may be other less obvious defects in the draft DCO, which the local authorities and FPC have not identified. Fundamentally though it should not be for local authorities, FPC and the local community to have to undertake such a forensic exercise (and in the process waste significant time and cost) to identify where National Grid is seeking to resile from its existing obligations at the substations site.

**2LVIA8** - ESC already have controls at the substations site in respect of lighting as set out in Requirements 22, construction lighting, and 25, operational lighting, (work number 41 is the National Grid substation) as set out in Part 3 Schedule 1 of the EA2 DCO and reproduced below.

*Code of construction practice*

**22.—(1)** *No stage of the onshore works may commence until for that stage a code of construction practice (which must accord with the outline code of construction practice) has been submitted to and approved by the relevant discharging authority.*

**(2)** *The code of construction practice must include—*

- (a) a surface water and drainage management plan;*
- (b) a flood management plan;*
- (c) a construction phase noise and vibration management plan;*
- (d) a site waste management plan;*
- (e) a soil management plan including method statements for soil handling;*
- (f) an air quality management plan;*
- (g) a materials management plan;*
- (h) a pollution prevention and response plan including a groundwater protection method statement and construction method statements for the protection of onshore water;*

*(i) a stakeholder communications plan;*

*(j) an artificial light emissions management plan;*

*(6) In approving the code of construction practice the relevant discharging authority must consult with the relevant statutory nature conservation body in relation to the watercourse crossing method statement and in relation to the following plans to the extent that they relate to the Works Nos. specified—*

*(a) the surface water and drainage management plan in respect of Work Nos. 7 to 14 and Work No. 19;*

*(b) the construction phase noise and vibration management plan in respect of Work Nos. 7 to 14;*

*(c) the soil management plan in respect of Work No. 12 and Work No. 12A;*

*(d) the pollution prevention and response plan in respect of Work Nos. 7 to 14 and Work No. 19; and*

*(e) the artificial light emissions management plan in respect of Work Nos. 7 to 14.*

Works numbers 7 to 14 include construction compounds and cable route construction.

#### **Control of artificial light emissions during operational phase**

**25.—(1)** *Work No. 30 must not begin operation until an operational artificial light emissions management plan providing details of artificial light emissions during the operation of Work No. 30, including measures to minimise lighting pollution and the hours of lighting, has been submitted to and approved by the relevant planning authority.*

*(2) The approved operational artificial light emissions management plan must be implemented upon, and maintained during, the operation of Work No. 30.*

*(3) Work No. 41 must not begin operation until an operational artificial light emissions management plan providing details of artificial light emissions during the operation of Work No. 41, including measures to minimise lighting pollution and the hours of lighting, has been submitted to and approved by the relevant planning authority.*

*(4) The approved operational artificial light emissions management plan must be implemented upon, and maintained during, the operation of Work No. 41.*

*(5) Work No. 38 must not begin operation until an operational artificial light emissions management plan providing details of artificial light emissions during the operation of Work*

No. 38, including measures to minimise lighting pollution and the hours of lighting, has been submitted to and approved by the relevant planning authority.

(6) The approved operational artificial light emissions management plan must be implemented upon, and maintained during, the operation of Work No. 38.

**2ECOL7**- Hedge gap closures – the cumulative impact with Lionlink needs to be considered here. The National Grid Lionlink project is considering what it calls a northern cable route to connect the Lionlink converter station the National Grid substation as shown in the images at Appendix 1. This route would appear to involve another 39 metre hedge gap substantially degrading the landscape mitigation to the north of Friston. This clearly demonstrates why a requirement equivalent to Requirement 42 Part 3 Schedule 1 of the EA2 DCO needs to be included to mitigate this cumulative impact. This requirement is reproduced below. FPC has previously made submissions on this point in its post-ISH2 submissions [REP4-148](#) at paragraphs 23 and 24.

#### *Installation of cable ducts*

**42.—(1)** *In the event that the cables comprised within the East Anglia ONE North cable works are installed prior to the cables comprised within the East Anglia TWO cable works, the East Anglia TWO cable works may not subsequently be installed unless the cable ducts forming part of the East Anglia TWO cable works have been installed concurrently with the installation of the cables comprised within the East Anglia ONE North cable works.*

**(2)** *For the purposes of this requirement—*

*(a) “the East Anglia ONE North cable works” mean Work Nos. 6, 8, 9, 11, 12, 13, 16 to 23 and 26 of the East Anglia ONE North Order; and*

*(b) “the East Anglia TWO cable works” mean Work Nos. 6, 8, 9, 11, 12, 13, 16 to 23 and 26 of this Order.*

**2TT7** - FPC awaits the responses from SCC and ESC, but this question is also relevant to FPC's Deadline 5 submission Comments on Information/Submissions Received by Deadline 4 in the Sealink DCO on the Outline Construction Traffic And Travel Plan.

**2NV1** - wording in relation to operational noise and acoustic design at the substations site already exists in the EA2 DCO (Requirements 27 and 22 Part 3 Schedule 1) and could be used in the Sealink DCO subject to some consequential amendments.

Please note that these noise requirements were agreed following a meeting between experts acting for ESC, SPR (who were coordinating with National Grid) and SASES. The expert for SASES was Mr Rupert Thornely-Taylor.

#### *Control of noise during operational phase*

27.—(1) The combined noise rating level for the standard operation of Work No. 30 cumulatively with the standard operation of the new national grid substation and the East Anglia ONE North onshore substation must not exceed—

(a) 32dB LAeq (15 min) at any time at a free field location immediately adjacent to the following noise sensitive locations—

(i) 1 Woodside Cottages, Grove Road (641837, 261172);

(ii) Woodside Barn Cottages, Church Road (641237, 260645);

(b) 31dB LAeq (15 min) at any time at a free field location immediately adjacent to the noise sensitive location—

- Little Moor Farm, Knodishall (641228, 261676).

(2) Work No. 30 must not operate at the same time as the new national grid substation or the East Anglia ONE North onshore substation until a scheme for monitoring compliance with the noise rating levels set out in sub-paragraph (1) above has been submitted to and approved by the relevant planning authority. The scheme must be based on principles set out in BS 4142:2014+A1:2019. The reference method set out in Annex D to BS 4142:2014+A1:2019 shall be used in the assessment of whether tonal penalties apply. The scheme must identify—

(a) the required meteorological and other conditions under which the measurements will be taken, acknowledging that data obtained during emergency operation or testing of certain plant and equipment is not to be taken in to account;

(b) suitable monitoring locations (and alternative surrogate locations if appropriate);  
and

(c) times when the monitoring is to take place

to demonstrate that the noise levels have been achieved after—

(d) initial commencement of—

(i) Work No. 30, the new national grid substation and the East Anglia ONE North onshore substation all operating at the same time; and

(ii) where Work No. 30 begins operation before the East Anglia ONE North onshore substation, Work No. 30 and the new national grid substation operating at the same time; and

(e) six months after—

(i) Work No. 30, the new national grid substation and the East Anglia ONE North onshore substation have all been operating cumulatively at full capacity; and

(ii) where Work No. 30 begins operation at least six months before the East Anglia ONE North onshore substation, both Work No. 30 and the new national grid substation have been operating cumulatively at full capacity.

(3) The monitoring scheme must be implemented as approved.

(4) For the purposes of this requirement—

(a) “East Anglia ONE North onshore substation” means the onshore substation comprised within Work No. 30 of the East Anglia ONE North Order;

(b) “new national grid substation” means the national grid substation comprised within Work No. 41 of this Order and Work No. 41 of the East Anglia ONE North Order; and

(c) “standard operation” means the ordinary operation of the substations excluding emergency operation and the testing of plant and equipment associated with emergency operation.

#### Detailed design parameters onshore

12.—(1) No stage of Work No. 30 may commence until details of the layout, scale and external appearance of the onshore substation have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. Work No. 30 must be carried out in accordance with the approved details.

(2) No stage of Work No. 30 may commence until written details of the specification of plant, and any noise mitigation proposed in respect of Work No. 30 together with updated modelling, have been submitted to and approved in writing by the relevant planning authority in consultation with Suffolk County Council. Work No. 30 must thereafter be implemented in accordance with the approved details.

(3) No stage of the national grid substation comprised within Work No. 41 may commence until details of the layout, scale and external appearance of the national grid substation have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. Work No. 41 must be carried out in accordance with the approved details.

It is appreciated that paragraph 12(2) only relates to the Scottish Power substation but FPC regards the omission of the National Grid substation as inadvertent. In any event the drafting of this paragraph can be used subject to the necessary consequential amendments.

**2CEInter1** - Mitigation of inter-project cumulative effects – future connections to the National Grid substation including Lionlink and other projects listed in NESO’s TEC register will require the expansion of the National Grid substation. A concern arose during the EA2 examination that permitted development rights might allow National Grid to expand its substation without seeking any form of planning consent. Given the environmental impacts of such expansion and the EXA’s concerns about future development at the substations site (see extracts from their report highlighted in blue at the head of this submission), particularly landscape and flood risk, Requirement 44 Part 3 Schedule 1 was included in the EA2 DCO. National Grid has chosen to omit this requirement from the draft DCO. FPC also considers this issue is relevant to change 2 in CR1. The requirement is reproduced below. Such a requirement should be included in the draft DCO subject to any consequential amendments required.

*Control of development during operational phase*

*44.—(1) During the operation of and within operational land related to Work No. 30 and Work No. 41, any development in addition to that authorised in this Order that is permitted under Schedule 2 Part 15 Class B (d), (e) or (f) of the General Permitted Development Order 2015 (“electricity undertakings permitted development”) or any equivalent successor provision is subject to the following conditions—*

*(2) In respect of operational drainage—*

*(a) No electricity undertakings permitted development may commence until an amendment to the operational drainage management plan approved pursuant to requirement 41 that includes provision for the replacement of any existing drainage measures to be removed and maintenance of any new drainage measures to be provided as part of the permitted development, has been submitted to and approved by the relevant lead local flood authority, in consultation with the relevant planning authority and the Environment Agency; and*

*(b) The measures in the amendment to the operational drainage management plan in respect of the permitted development must be implemented as approved.*

*(3) In respect of the provision, implementation and maintenance of landscaping—*

*(a) No electricity undertakings permitted development may commence until an amendment to the written landscape management plan and associated work programme approved pursuant to requirement 14 that includes provision for the replacement of any existing landscape measures to be removed and maintenance of any new landscape measures to be provided as part of the permitted development, has been submitted to and approved by the relevant planning authority; and*

*(b) The measures in the amendment to the written landscape management plan and associated work programme plan in respect of the permitted development must be implemented as approved.*

**END - Appendix 1 below**

## APPENDIX 1

