

FRISTON PARISH COUNCIL



NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 10 March 2026 (submitted 12 March 2026)

DEADLINE 5 - COMMENTS ON INFORMATION/SUBMISSIONS RECEIVED BY DEADLINE 4

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)”

1. This document is Friston Parish Council's and SASES's (together referred to as FPC below) combined comments on information/submissions received by Deadline 4.
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.

REP4-061 & 062 – Outline Construction Traffic And Travel Plan

FPC made specific comments concerning the content of this plan and the use of the B1121 through Friston (S-RL9) as set out in paragraph 13 of its written post ISH2 submission ([REP4-121](#)). These comments have not been adequately reflected in the Outline Construction Traffic And Travel Plan submitted at Deadline 4. Whilst paragraph 7.4.15 has been added, the issue is that the B1121 through Friston is designated as an HGV route to enable access for the

pylon upgrading works at S-AP-10. FPC's request is that the B1121 (S-RL9) is not to be used as an HGV route for any other purpose, including in the circumstances of road closures.

FPC's understanding from NG is that in fact in order to carry out the pylon upgrading works HGVs will not need to use the B1121 at all, since loads will be transported by a tractor and trailer. Accordingly a better approach is for the B1121 through Friston (S-RL9) not to be designated as an HGV route at all and further, such use as there will be for construction traffic should be strictly limited to the pylon upgrading works.

REP4-217 & 218 - Draft Development Consent Order Version G

Clause 5

Amendments have been made to paragraph 3 (Detailed Design) of Schedule 3 of the draft DCO submitted at deadline 4 (REP 4-217 & 218) so that the design approved under the EA2 DCO in respect of the National Grid substation is carried forward into the draft Sealink DCO.

Similar amendments should be included in relation to all of the EA2 discharge documents, not just in relation to design, which have been and will have been approved as part of the discharge of requirements process under the EA2 DCO. Of course such amendments should only come into play if EA2 does not go ahead.

However these amendments to paragraph 3 (Detailed Design) of Schedule 3 are defective in a number of respects relative to the design requirements for the National Grid substation in the EA2 DCO. Details of the defects are set out in FPC's response to 2GEN5&6 of EXQ2.

REP 4-241 – Table 8.1 Applicant's Comments on the Submissions from Friston Parish Council And Substation Action Save East Suffolk Ltd

Cumulative Impact Page 96 – TEC Register

On page 102 the National Grid comments that:

“The South Anglia Connection Node referred to in the TEC registers is a holding position used to get applicants into their system in advance of the relevant system studies and other exercises being undertaken which will influence which specific connection point is offered. This may be Friston (Kiln Lane), or another substation in East Anglia.”

This is misleading. The entry in the TEC register, attached at Appendix 1 (entry 1758), is for a project at Red House Farm which lies between Friston and Sternfield. The entry in the first column states:

“Red House Farm – Friston 400 kV 249 MW connection”

This is then referred to in the third column as:

“South Anglia Connection Node E 400 KV Substation.”

Is National Grid seriously suggesting that the connection point for a project at Red House Farm could be anywhere in East Anglia when there is a connection point at Friston, particularly when the entry refers to a Friston connection?

Please note that National Grid has not denied that it works in close collaboration with NESO.

Accordingly FPC reiterates its request that NESO gives evidence in the examination, and in particular the extent to which a future projects in this area will connect at the National Grid substation/Friston 400 kV 249MW connection/South Anglia Connection Node 400 kV substation which are one and the same connection point.

Cumulative Impact – Pages 102-104 – Helios Project

National Grid makes several references to the lack of information and refers to the Helios website. Just because a developer chooses not to disclose information on its website does not mean that information does not exist or is necessarily of a confidential nature, simply that the developer does not want to disclose it publicly. FPC has commented previously on this subject. It is clearly in the public interest that information in relation to the Helios project is disclosed by the developer to the examining authority. Helios is an existing project, it appears on the TEC register and the developer is having regular meetings with local authorities and National Grid. If there is not any information relating to this project then what do they talk about in their meetings? There may well be reliable information it is just that the developer is choosing not to disclose it (perhaps in an attempt to prevent it being considered in a cumulative impact assessment). Therefore the comments of Lang J do not apply.

Development Consent Order – Page 105

Why should a community have to spend so much time and effort to retain the benefit of the mitigation and requirements it already has under existing DCOs?

National Grid states that:

“Where appropriate and relevant, mitigation for the National Grid substation at Friston being proposed as part of the Proposed Project will reflect that being designed by SPR.”

The appropriateness and relevance of the mitigation and requirements at the substations site at Friston has been determined and recommended by the examining authorities for EA2 and EA1N and then given effect in DCOs granted by the Secretary of State. Consent orders which National Grid did not object to despite being involved in the examination process is for both projects.

The use of the word "reflect" only causes uncertainty and could provide National Grid with discretion to resile from the existing mitigation and requirements, something which it clearly has the intention of doing given its approach to the draft Sealink DCO.

The solution has always been straightforward. National Grid simply has to incorporate in the draft Sealink DCO a separate part which relates to the substations site, not just to the National Grid substation, as it wishes to take over the entirety of the substations site) which replicates the requirements of the EA2 and EA1N DCOs.

In relation to the transfer of *“the relevant benefits of the EA1N or EA to order powers”*, FPC’s understanding, given the recent decisions of the Secretary of State relation to the EA2 DCO, is those relevant benefits can be transferred. It is a straightforward mechanical legal exercise to effect such a transfer. It would seem to be to everyone’s benefit if this transfer could be effected prior to the end of the examination.

Traffic - Pages 106 -107

FPC notes National Grid’s comments but does not believe they are adequately reflected in the current outline traffic management plan (REP4- 061 & 062) as set out above.

FPC notes the assurances given by National Grid but ultimately they are self-serving. For a small rural community, now being forced to live next to a major piece of infrastructure, the independent view of the Suffolk Fire Service, which is the organisation which would have to deal with a fire, would be welcome. The apparent reluctance of the SFS to engage in the examination process is heightening FPC's concern. If SFS does not engage in the examination process, it would not be unreasonable for National Grid provide an independent fire risk assessment of the substations site and whether a fire might spread to the surrounding fields, vegetation and residential dwellings, particularly during the very dry summer months.

END

APPENDIX 1

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1753	Raleigh 1 Tertiary	RALEIGH GREEN LIMITED	Raleigh Main 400V Substation		0	57	57	2025/10/01	Consents Approved	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404JL0000005640AA	PRO-00460
1754	Raleigh 2 Tertiary	ENSO GREEN HOLDINGS J LIMITED	Raleigh Main 400V Substation		0	57	57	2025/10/01	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404JL0000005640AA	PRO-00466
1755	Raleigh GP3	ENSO GREEN HOLDINGS J LIMITED	Raleigh Main 400V Substation		0	30	30	2024/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404B0000000P260AAG	PRO-00513
1756	Recall at Penrhos (BESA)	Recall Energy Bloom Developments Limited	Penrhos SSP	1	0	150	150	2025/10/30	Consents Approved	Embedded	NGET	Biomass	404JL0000005640AA	PRO-00530-1
1757	Recall at Penrhos (BESA)	Recall Energy Bloom Developments Limited	Penrhos SSP	2	0	60	210	2023/02/28	Consents Approved	Embedded	NGET	Biomass	404JL0000005640AA	PRO-00530-2
1758	Red House Farm - Friston 400V 240kW connection	CAMBRIDGE POWER LIMITED	South Anglia Connection Node E 400V Substation		0	249	249	2024/10/01	Scoping	Direct Connection	NGET	Energy Storage System	404B000000164AAA	PRO-00237
1759	Red Moss Farm	CAIR RENEWABLES UK LIMITED	Red Moss Farm 132kV Substation		0	300	300	2020/10/30	Scoping	Direct Connection	SPT	Energy Storage System	404B000000164AAA	PRO-00283
1760	Reddish	CENERGY GLOBAL ENERGY (UK) LIMITED	Feckingham GSP	29	0	29			Built	Embedded	NGET	COGT (Combined Cycle Gas Turbine)	404JL0000005640AA	PRO-00198
1761	Redfield Road A	WRDS 178 LIMITED	Redfield GSP	20.88	0	20.88			Built	Embedded	NGET	CHP (Combined Heat and Power)	404JL0000005640AA	PRO-00196
1762	Redfield Road B	WRDS 178 LIMITED	Redfield GSP	20.88	0	20.88			Built	Embedded	NGET	Thermal	404JL0000005640AA	PRO-00197
1763	Redhill BESS	ANESCO LIMITED	Wrecclesley Connection Node D 400V Substation		0	300	300	2025/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404B000000164AAA	PRO-00467
1764	Redhaw Energy Park	Redhaw Energy Park Developments LLP	Linnhill 132kV		0	500	500	2021/10/30	Scoping	Direct Connection	SPT	Energy Storage System	404B0000000640AA	PRO-00382
1765	Rhigos BESS	Environema Energy Management UK Limited	Rhigos B Substation		0	221	221	2023/10/01	Scoping	Direct Connection	NGET	Energy Storage System	404B000000164AAA	PRO-00216
1766	Rhigos BESS	KONA ASSET 4 LIMITED	South Wales West Connection Node A 400V Substation		0	225	225	2023/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404B0000001259AA	PRO-00613
1767	Rhigos BESS	RENE 11 Limited	South Wales West Connection Node A 400V Substation		0	200	200	2023/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404B000000164AAA	PRO-00419
1768	Riccarton	M2 Energy Storage Limited	Curry 275/132kV		0	150	150	2023/04/13	Scoping	Direct Connection	SPT	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00266
1769	Ridborough 1	RICHBOROUGH ENERGY PARK LIMITED	Ridborough 400V Substation		50	0	50		Built	Direct Connection	NGET	Energy Storage System	404JL0000005640AA	PRO-00185
1770	Ridborough 2	RICHBOROUGH ENERGY PARK LIMITED	Ridborough 400V Substation		50	0	50		Built	Direct Connection	NGET	Energy Storage System	404JL0000005640AA	PRO-00184
1771	RIGG HOUSE PV FARM	FVS DEAN MOOR LIMITED	Harker GSP		0	150	150	2023/10/01	Scoping	Embedded	NGET	PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00429
1772	Riggs BESS	FIELD RIGGS LIMITED	Gills Bay 132kV		0	200	200	2023/10/12	Scoping	Direct Connection	SPT	Energy Storage System	404B000000164AAA	PRO-00278
1773	Rivox Wind Farm	RIVOX WIND ENERGY HUB LIMITED	Rivox 132kV		0	220	220	2021/10/10	Scoping	Direct Connection	SPT	Energy Storage System/Wind Onshore	404JL000000164AAA	PRO-00164
1774	Roaring Hill Energy Storage Facility	ROARING HILL ENERGY STORAGE LTD	Glenrothes GSP	49.89	0	49.89			Built	Embedded	SPT	Energy Storage System	404JL0000005640AA	PRO-00172
1775	Robin Rigg East Offshore Wind Farm	RWE RENEWABLES UK ROBIN RIGG EAST LIMITED	Robin Rigg East 132kV Offshore Substation	86	0	86			Built	Direct Connection	OFTO	Wind Offshore	404JL0000005640AA	PRO-00194
1776	Robin Rigg West Offshore Wind Farm	RWE RENEWABLES UK ROBIN RIGG WEST LIMITED	Robin Rigg West Offshore Wind Farm Substation	92	0	92			Built	Direct Connection	OFTO	Wind Offshore	404JL0000005640AA	PRO-00195
1777	Rochdale BESS	Rochdale BESS Ltd	Rochdale 132kV Substation		0	57	57	2023/07/30	Scoping	Direct Connection	NGET	Energy Storage System	404JL0000005640AA	PRO-00186
1778	Rochester Renewable Project	WITTENFALL WIND POWER LTD	Kingmoor 132kV Substation		0	60	60	2023/09/22	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)/Wind Onshore	404JL0000005640AA	PRO-00267
1779	Rocknase	ROCKNASE POWER COMPANY LTD.	Rocknase 400V Substation	810	0	810			Built	Direct Connection	NGET	COGT (Combined Cycle Gas Turbine)	404B0000005640AA	PRO-00024
1780	Roger Hill Farm	CAIR RENEWABLES UK LIMITED	Roger Hill Farm 132kV Substation		0	200	200	2021/10/01	Scoping	Direct Connection	SPT	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00178
1781	Rugbyton Cottage BESS	GPC 481 Ltd	East Kilbride 275/132kV		0	55	55	2020/10/19	Scoping	Embedded	SPT	Energy Storage System	404B000000164AAA	PRO-00543
1782	Roseate	CBS ENERGY STORAGE ASSETS UK LIMITED	Roseate 132kV Substation	49	0	49			Built	Embedded	NGET	Energy Storage System	404JL0000005640AA	PRO-00919
1783	Rosefield	Rosefield Energy Storage Assets UK Limited	East Clayton 400V Substation		0	500	500	2021/10/01	Awaiting Consents	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404JL0000005640AA	PRO-00164
1784	Rothmansom 50MW BESS	ROTHMANSOM FLUXPOWER LTD	Rothmansom GSP		0	50	50	2024/10/01	Scoping	Embedded	SPT	Energy Storage System	404JL0000005640AA	PRO-00230
1785	Rothmansom Battery	BLACKFORD RENEWABLES LTD	Rothmansom 400V Substation		0	500	500	2023/10/01	Scoping	Direct Connection	SPT	Energy Storage System	404JL0000005640AA	PRO-00191
1786	Rothmansom Bystic Corp	ROTHMANSOM GRID SERVICES LIMITED	Rothmansom 400V Substation		0	0	0		Built	Direct Connection	SPT	Reactive Compensation	404JL0000005640AA	PRO-00145
1787	Rowan Wind Energy Farm	ENERGYFARM ROWAN LLP	Rowan 275/132kV Substation		0	90.8	90.8	2024/10/01	Scoping	Direct Connection	SPT	Energy Storage System/Wind Onshore	404B000000164AAA	PRO-00823
1788	Rozencrag Wind Farm	Koehler Renewable Energy UK Limited	Gangles 132kV		0	40	40	2023/10/30	Scoping	Direct Connection	SPT	Wind Onshore	404JL0000005640AA	PRO-00245
1789	Ruyle Farm BESS	ALUDRA BESS LTD	Oxleyton 132kV Substation		0	90	90	2023/10/01	Scoping	Embedded	NGET	Energy Storage System	404B0000000P260AAG	PRO-00550
1790	Rugby High Impact Green Energy Hub (RHIG) 1	TELS ENERGY UK LIMITED	Enderby 400V Substation		0	1000	1000	2024/10/01	Scoping	Direct Connection	NGET	Energy Storage System/Nuclear/PV Array (Photo Voltaic/Isola)/Wind	404B0000001206AA	PRO-00526
1791	Rugby	RFP SOLAR 17 LIMITED	Rugby 400V Substation		0	600	600	2021/06/30	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404JL0000005640AA	PRO-00160
1792	Rugby	RUGLEY POWER GENERATION LIMITED	Rugby GSP		0	50	50	2020/10/30	Scoping	Direct Connection	NGET	Coal	404JL0000005640AA	PRO-00029
1793	Rugby Battery Storage	RUGLEY POWER GENERATION LIMITED	Rugby 400V Substation		0	400	400	2023/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404JL0000005640AA	PRO-00215
1794	Ruth Croc	Ruth Croc Wind Farm Limited	Dalrath 132kV Substation		0	158.4	158.4	2023/10/01	Scoping	Direct Connection	SPT	Wind Onshore	404B0000000P260AAG	PRO-00817
1795	Rutherford Farm	ECOCCEL ENERGY STORAGE LTD	East Kilbride 275kV Substation		0	200	200	2023/10/01	Scoping	Direct Connection	SPT	Energy Storage System	404B0000001206AA	PRO-00450
1796	Rye House	RYE HOUSE 19 RENEWABLES LIMITED	London North East Connection Node A		0	1000	1000	2021/10/01	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00413
1797	Rye House	VP Power Limited	Rye House GSP	715	0	715			Built	Direct Connection	NGET	COGT (Combined Cycle Gas Turbine)	404JL0000005640AA	PRO-00191
1798	Ryhal Farm	548 UK INVESTMENT HOLDINGS LIMITED	Caeswick 400V Substation		0	200	200	2024/10/01	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00284
1799	Ryhal PV 4 BESS	GREAT CASTERTON ENERGY PARK LIMITED	Ryhal 400V Substation		0	400	400	2024/10/01	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00479
1800	SAE Uak 1	SMEC USMOUTH POWER LIMITED	South Wales East Node A 275kV Substation		0	349	349	2023/10/01	Scoping	Direct Connection	NGET	Energy Storage System	404B0000001206AA	PRO-00590
1801	SAE Solar	SAE NORTH SEA LIMITED	St Fergus Mobil		0	20	20	2023/06/30	Scoping	Direct Connection	SPT	Demand PV Array (Photo Voltaic/Isola)	404JL0000005640AA	PRO-00219
1802	Salamanca Offshore Wind Farm	SALAMANCA WIND PROJECT COMPANY LIMITED	Pierhead GSP		0	200	200	2020/03/31	Scoping	Direct Connection	SPT	Energy Storage System/Wind Offshore	404JL0000005640AA	PRO-00152
1803	Sallyscroft Wind Farm	WIN SALLYSCROFT LIMITED	Cassidy GSP		0	46.5	46.5	2021/08/31	Awaiting Consents	Embedded	SPT	Wind Onshore	404JL0000005640AA	PRO-00217
1804	Saltrick NEP BESS Facility	Reahley New Energy Limited	Saltrick 132kV		0	100	100	2023/10/01	Scoping	Direct Connection	SPT	Energy Storage System	404B000000164AAA	PRO-00283
1805	Saltrick	SALTEND COGENERATION COMPANY LIMITED	Saltrick South 400V Substation	1100	0	1100			Built	Direct Connection	NGET	COGT (Combined Cycle Gas Turbine)	404B0000005640AA	PRO-00059
1806	Saltrick North BESS & PV	EEB1 LIMITED	Hickon 275kV Substation		0	200	200	2020/10/30	Scoping	Direct Connection	NGET	Energy Storage System	404JL0000005640AA	PRO-00226
1807	Saltrick Battery Storage	BUCCLEUCH ESTATES LTD (THE)	Dalrath 400V Substation		0	200	200	2021/10/01	Scoping	Direct Connection	SPT	Energy Storage System	404B000000164AAA	PRO-00410
1808	Saltrick BESS	Harmony SH Limited	Saltrick 275kV Substation		0	200	200	2020/10/26	Scoping	Direct Connection	NGET	Energy Storage System	404B000000164AAA	PRO-00357
1809	Sand Quarry Old Glasgow Road BESS	GPC 1134 Ltd	Whinney 132kV		0	100	100	2020/05/07	Scoping	Direct Connection	SPT	Demand Energy Storage System	404B000000164AAA	PRO-00276
1810	SANDFORD	SSE DE SOLAR HOLDINGS LIMITED	Sandford 400V		0	600	600	2023/10/30	Scoping	Direct Connection	NGET	Energy Storage System/PV Array (Photo Voltaic/Isola)	404B000000164AAA	PRO-00580
1811	Sandy Knowe Wind Farm	SANDY KNOWE WIND FARM LIMITED	Sandyknowe 132kV	1	86.4	0	86.4		Built	Direct Connection	SPT	Wind Onshore	404JL0000005640AA	PRO-00345-1
1812	Sandy Knowe Wind Farm	SANDY KNOWE WIND FARM LIMITED	Sandyknowe 132kV	2	0	21.6	108	2021/10/01	Awaiting Consents	Direct Connection	SPT	Wind Onshore	404JL0000005640AA	PRO-00345-2
1813	Sanghar 1 Wind Farm	SANQHAR II COMMUNITY WIND CO LTD	Gangles 132kV Substation	1	0	137	137	2024/07/31	Consents Approved	Direct Connection	SPT	Wind Onshore	404JL0000005640AA	PRO-00352-1
1814	Sanghar 1 Wind Farm	SANQHAR II COMMUNITY WIND CO LTD	Gangles 132kV Substation	2	0	113	250	2021/02/28	Consents Approved	Direct Connection	SPT	Wind Onshore	404JL0000005640AA	PRO-00352-2