FRISTON PARISH COUNCIL

NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 13 April 2026

DEADLINE 6 - RESPONSES TO EXQ3

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 EXQ3.

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.

GENERAL

3GEN23 – FPC would remind examining authority that there is no such qualification in the EA2 DCO

3GEN26 – the EA2 DCO recognises that the National Grid substation will need to be decommissioned although it will have a longer life than the Scottish Power EA2 and EA1N

substations. Therefore the National Grid substation should not be excluded from decommissioning requirements but perhaps there should be recognition that that decommissioning may occur at a different time. Requirement 30 in Part 3 of Schedule 1 of the EA2 DCO is set out below. The "grid connection works" referred to in sub paragraphs (3) and (4) are all the National Grid works at the substation site including the substation. The definition is *"grid connection works" means Work Nos. 34 and 38 to 43 and any related associated development;*

Onshore decommissioning

***30.**—(1) The undertaker must notify the relevant planning authority of the permanent cessation of commercial operation of the transmission works within 14 days following the date of permanent cessation.*

(2) Within six months following the permanent cessation of commercial operation of the transmission works an onshore decommissioning plan in respect of the transmission works must be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority and the relevant statutory nature conservation body.

(3) The undertaker must notify the relevant planning authority of the permanent cessation of commercial operation of the grid connection works within 14 days following the date of permanent cessation.

(4) Within six months following the permanent cessation of commercial operation of the grid connection works an onshore decommissioning plan in respect of the grid connection works must be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority and the relevant statutory nature conservation body.

(5) The decommissioning plans must be implemented as approved.

3GEN27 – the reason why this requirement needs to be reworded is set out in the OFH3 submission made by FPC. A written version of this has been submitted at Deadline 6. The current drafting could enable National Grid to make a unilateral decision to have the National Grid substation and the substations site (excluding only the footprints of the EA2 and EA1N substations) subject to the Sealink DCO with its weaker requirements and mitigation compared to the already granted EA2 and EA1N DCOs.

FPC would suggest the following wording.

15.(1) Where any part of Work No.1B (including without limitation any works associated with Work 1B otherwise within Work Nos.4,13,14,15,16,and 17 and any associated development within paragraph 2 below) has been commenced pursuant to any other development consent order ("relevant DCO"), those works must not be constructed under this Order and will be completed and operated under the relevant DCO unless the undertaker (as defined in the relevant DCO) has notified the Secretary of State that it no longer intends to complete the authorised development (as defined in the relevant DCO).

FPC would point out that not only are the requirements and mitigation in the draft Sealink DCO in relation to the National Grid substation and the substations site weaker compared to those in the EA2 and EA1N DCO, it is also extremely difficult if not impossible to determine at a

detailed level whether the requirements and mitigation in the EA2 and EA1N DCOs have been effectively replicated in the draft Sealink DCO. This is due to the manner in which National Grid has chosen to draft the draft Sealink DCO thereby putting SCC, ESC and FPC at a material disadvantage and requiring unnecessary work and duplication of effort.

3GEN29 – FPC welcomes the attempt by SCC to clawback the requirements, controls and mitigation which already exists in the EA2 and EA1N DCOs. FPC has reviewed this new requirement which of course is an example of the unnecessary work and duplication of effort referred to in the previous paragraph**.** The onus should be on National Grid justify where it wants to move away from the existing requirements and mitigation, rather than for the local authorities and communities to work out whether the existing requirements and mitigation have been clawed back.

FPC considers that this drafting goes some way to recovering the requirements and mitigation in the EA2 and EA1N DCOs, but this is difficult to conclusively establish given that National Grid has drafted the description of the Works Numbers differently.

FPC does have a reservation in that the definition of Work No.1B and Work No. 41 are not on all fours with each other. For example Work No.1B includes at subparagraph (a) the operational access road, at subparagraph (d) landscaping, at subparagraph (u) drainage work and at subparagraph (bb) again landscaping including mitigation planting. In the EA2 and EA1N DCOs these are covered respectively by Work No. 34, Work No. 33 (landscaping), Work No. 33 (drainage works) and also associated development.

There are also other mismatches between Works Numbers which are relevant to the National Grid substation such as Work No. 4 (Suffolk temporary work compounds) which in the EA2 and EA1N DCOs are covered by a number of works numbers such as 42 and 43.

Accordingly FPC would suggest that this new requirement is amended as follows (the new text being in blue).

'Requirement [x] (new substation at Grove Wood, Friston, Suffolk and related works at the Friston substations site)

(1) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No. 1B including without limitation any works associated with Work 1B otherwise within Work Nos.4,13,14,15,16,and 17 and any associated development within paragraph 2 of Part 1 of Schedule 1("Work No. 1B Works")) must be constructed in compliance with each Requirement applicable to Works Nos.41,42,43,33,34 and associated development ("Work No. 41 Works") of the East Anglia TWO Offshore Wind Farm Order 2022 ("SI 2022/433"), as if the Work No.1B Works were constructed under SI 2022/433.

(2) In so far as any Requirement of SI 2022/433 ("the 2022/433 Requirement") entails the making of an application by the undertaker for the purposes of Work No. 41 Works or the approval of an application by the discharging authority for the purposes of that work, and at the date when the undertaker intends to carry out works comprised in the Work No. 1B Works no application has been made and no approval of an applications has been given, the 2022/433 Requirements are deemed to be Requirements of this Schedule for all purposes concerned with their discharge and the undertaker is deemed to be a person entitled to apply for their discharge and the relevant planning authority is deemed to be the discharging authority.

(3) The discharge of a 2022/433 Requirement by the relevant planning authority in accordance with paragraph (2) is conclusive evidence that that Requirement has been discharged for the purposes of this Schedule.'

(4)This requirement is to be interpreted so that all works at the substations site at Friston including the site of the operational access road are carried out under this development consent order as if they had been conducted under SI 2022/433 and all the requirements, mitigation and controls contained therein.

3GEN30 – FPC would point out that suitable wording is already included in the EA2 DCO, paragraph 25 (3) and (4). This is reproduced below with the number 41 replaced by the number 1B.

(3) Work No. 1B must not begin operation until an operational artificial light emissions management plan providing details of artificial light emissions during the operation of Work No. 1B, 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. 1B.

3GEN31 – FPC would point out that wording is already included in the EA2 DCO, paragraph 42 of Part 3 of Schedule 1. This is reproduced below with consequential amendments.

Installation of cable ducts

[x]. *(1) The Sealink AC cable works may not be installed unless the cable ducts forming part of the Lionlink AC cable works have been installed concurrently with and alongside the installation of the AC cables comprised within the Sealink cable works.*

(2) For the purposes of this requirement—

(a)"the Sealink AC cable works" mean Work No. 2; and

(b)"the Lionlink AC cable works" means the Southern route AC cables required between the Lionlink convertor station and Work No. 1B as described in the Preliminary Environmental Information Report published by National Grid Ventures Limited, a subsidiary of National Grid plc.

3GEN32 – FPC would point out that wording is already included in the EA2 DCO, paragraph 44 of part 3 of Schedule 1. This is reproduced below with consequential amendments.

Control of development during operational phase

[x].*—(1) During the operation of and within operational land related to Work No. 1B, 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 this development consent order 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 this development consent order 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.

TRAFFIC AND TRANSPORT

3TT7 – FPC has made comments on HGV caps in relation to the B1121 through Friston at Sternfield in its responses to the ISH3 Action Points AP11.

AIR QUALITY

3AQ1 – During the EA2 and EA1N examinations, which took place over a nine month period in 2020 and 2021, it was indicated that National Grid would be moving to SF6 free equipment. This is supported by an article (set out below) on National Grid's website dated 9th December 2021, almost 5 years ago.

Project replacing SF6 with greener alternative will cut emissions from high-voltage equipment

9th December 2021

Journey to net zero

National Grid has partnered with Hitachi Energy in a pilot project at Richborough Substation in Kent, to develop and deploy a new solution to replace greenhouse gas Sulphur Hexafluoride (SF_6) with a greener alternative.
The change forms part of our ambition to reduce our SF_6 emissions by 50% by 2030; by eliminating nearly 6 tonnes of SF_6 emissions – the equivalent of taking more than 100,000 cars off the road – and removing all SF_6 gas from electricity assets by 2050.

What is SF_6 greenhouse gas?

SF_6 is a gas commonly used in the electricity industry to prevent short circuits and to keep the network safe and reliable. The new solution allows us to replace SF_6 in gas-insulated busbars with a greener alternative, without changing the equipment.

How will removing SF_6 help reduce carbon emissions?

The transition to net zero means an increase in electricity generation and transmission assets, meaning more associated equipment such as electrical switches and circuit breakers. The vast majority of these safety devices (known as 'switchgear') use SF_6 as an insulator. Removing the SF_6 gases reduces our carbon emissions.

Climate change is the greatest challenge of our time and this … will help achieve wide-scale decarbonisation on our electricity transmission network.

Chris Bennett, Acting President of National Grid Electricity Transmission, said: "Climate change is the greatest challenge of our time and this new, transformational green technology will help achieve wide-scale decarbonisation on our electricity transmission network.

World-first transformational green technology

Hitachi Energy's EconiQTM is the world's first SF_6 replacement product for installed gas-insulated switchgear. Using this new solution means that we can avoid the environmental

impact and cost of replacing equipment, which is otherwise fit for many more years' service. The technology uses a fluoronitrile-based gas mixture and reduces the carbon footprint throughout the total lifecycle of the equipment, while keeping reliability high.

Chris adds: "We are proud to be working with Hitachi Energy and to demonstrate a practical solution to a significant issue in the energy industry's transition to net zero."

Markus Heimbach, Managing Director of High Voltage Products business in Hitachi Energy, said: "We have a responsibility to help our customers like National Grid to accelerate the energy transition". He also commented that the new, innovative technology "…will enable our customers and the industry as a whole to reduce carbon footprint and rapidly transition to eco-efficient solutions."

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