

FRISTON PARISH COUNCIL



NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 23 April 2026

DEADLINE 6 – OFH3 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)”

1. This document is Friston Parish Council's and SASES's (together referred to as FPC below) combined responses to the action points arising from ISH 3.
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. The following is a summary of the oral submission made on behalf of Friston Parish Council at the open floor hearing on Tuesday 24 March 2026.

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5. FPC's comments are primarily directed to change 2 in the change request relating to the location and limits of deviation of the National Grid connection hub, and the context in which that change is being sought. Whilst we have concerns with change 3, given FPC's resources FPC has left that to the local authorities and has chosen to focus on change 2.

6. Because National Grid is refusing to honour the existing requirements for the substations site in the draft Sealink DCO this has created an environment of zero trust. Therefore whatever National Grid may say in relation to change 2 is not meaningful. FPC's concern is making sure that requirements and mitigation are clearly secured on the face of the DCO and that the Friston community has the benefit of the mitigation and requirements which it already has under the Scottish Power DCOs.
7. FPC would not want there to be any assumption that its community is happy with the terms of the Scottish Power DCOs. It is not. However they have been granted and therefore we have to live with them.
8. In contrast National Grid seems to think that it can effectively relitigate the requirements and mitigation at the substations site. Generally legal processes do not permit the relitigation of issues which have already been determined.
9. Quite frankly the situation is ridiculous and represents a huge failure by the Planning Inspectorate to ensure the efficient running of the planning process. As you may recall FPC wrote to the Planning Inspectorate in 2023 because FPC was concerned that National Grid was seeking to reopen the Scottish Power DCOs. Consistent with the general approach to community consultation FPC's concerns were ignored. This has led to a huge amount of unnecessary work and stress. FPC would remind everybody in this room that they are all paid to do this work and to be here today. We are not. We have to give up our free time and use such expertise as we have to support the Friston community without any form of compensation.
10. The need for the additional consent for the National Grid substation in the draft DCO was on the original premise that there was a risk that the Scottish Power projects would not go ahead. That risk no longer exists as there is no doubt that EA2 is going ahead and National Grid has the rights it needs in the EA2 DCO which are in the course of being transferred to it.
11. FPC's concern is that National Grid's true objective is, and has always been, to ensure that the National Grid substation and the substations site falls under the Sealink DCO regardless, and in doing so to water down the requirements and mitigation provided by the EA2 and EA1N DCOs. This was never really about addressing the risk that neither of the Scottish Power projects would go ahead.
12. This objective is clear from the wording of Paragraph 15 of Schedule 3 of the draft DCO.

Where any part of Work No.1B has been completed pursuant to another development consent order, those works must not be constructed under this Order, save where amendments to those works are required for the purposes of the Authorised Project

13. The effect of this paragraph is that National Grid can start works under the EA2 DCO and then unilaterally decide to "complete" them under the Sealink DCO, thereby ensuring that the substations site will be governed by the Sealink DCO with its reduced mitigation and requirements. Why should National Grid escape its existing obligations simply by saying it completed the substation under the Sealink DCO? Is this reasonable?
14. The terms of the Scottish Power DCOs were not arrived at without due consideration – a nine-month examination and 17 issue specific hearings. Is it really open for National Grid to ignore the result of that examination particularly when it was involved with it?

15. Of course none of this would have been an issue had National Grid respected the terms of the existing consents and replicated them in the draft DCO thereby saving a great deal of time, trouble and money.

Change 2 of the change request

16. Ironically the need for Change 2 has arisen because National Grid has not respected the existing consent. In essence it wants to make sure that the limits of deviation for the National Grid substation are the same as they are in the Scottish Power consents.

17. Even more ironically part of the justification for the change is how in effect the different DCOs are making it challenging for National Grid to develop consistent plans. Well there is an easy solution to that. Adopt the same DCO terms as already exist in the Scottish Power DCOs in the Sealink DCO.

18. FPC's concern is that the development of the substation both now and in the future will not be sufficiently controlled in the manner which it currently is under the EA2 DCO. In other words could National Grid expand a GIS substation 16m high to cover the footprint of an AIS substation which is 6m high? The footprint which is secured in the Scottish power DCOs is 16,800 m² for a GIS substation and 44,950 m² for an AIS substation.

19. FPC reminds the examining authority that despite FPC's invitation National Grid refused to engage with it on this issue.

20. National Grid did comment at deadline 4 on these concerns and whilst there is a lot of warm words those words do not provide any comfort, as FPC's issues are not addressed or secured on the face of the DCO as they are in the Scottish Power DCOs.

21. In essence National Grid wants to have its cake and eat it. It wants the flexibility of the EA2 DCO but not the requirements that come with it.

22. FPC's concerns can be easily addressed.

First, the maximum footprint of the GIS substation should be limited as it is on the face of the EA2 DCO.

Second, there should be a definition of a GIS substation i.e. the use of gas insulated switchgear – incidentally the continued use of SF₆ should be addressed namely it should be avoided wherever possible and the fact that an alternative to SF₆ might be more expensive is not a legitimate reason for National Grid not to use it.

Third, the newly introduced exclusion of roof mounted equipment in the height requirement should be removed.

Fourth the requirement to protect against uncontrolled permitted development, requirement 44 in the Scottish Power DCOs, should be reinstated. In that context it was telling that National Grid produced no visualisation of the expansion of the National Grid substation for the Lionlink project. No doubt because they felt that they were free to expand the National Grid substation without reference to any planning authority.

23. Fundamentally though National Grid does not need Change 2. What is required is either for National Grid finally to accept the reality that EA2 is going ahead or do what they should have done at the outset which is to have a separate part of the draft DCO for the National Grid substation on the substations site which replicates the existing DCOs. So, regardless of which DCO the National Grid substation is built under, the mitigation would be the same.

24. Otherwise the Friston community will have significantly reduced mitigation across the substations site simply by National Grid unilaterally deciding that it completed its substation under the Sealink DCO. Examples of that reduced mitigation include (without limitation):

- there will no longer be a 10 year landscape/replacement period as secured on the face of the EA2 DCO - still only 5 years is being offered
- seven day a week working hours on the substations site with the exception of the substation itself
- the exclusion of undefined roof mounted equipment above the height of 16m. In the EA2 DCO external electrical equipment is also limited to 16m above finished ground level
- the footprint of the GIS substation will no longer be secured
- the design of the GIS substation versus an AIS substation will not be secured
- there will no longer be protection against uncontrolled permitted development
- there will no longer be approval of lighting design either during construction or operation

25. FPC made a complex submission at Deadline 4 [REP4-200](#) on how National Grid has failed to replicate the mitigation and requirements in the Scottish Power DCOs in the draft Sealink DCO. The relevant part of the submission is set out in paragraphs 15-25 and Appendix 1.

26. The Friston community feels that it has already been “thrown under the bus” in the national interest, but what National Grid is doing is turning the bus around and running over Friston all over again.

27. In this context FPC does wonder how National Grid instructed its lawyers to draft the development consent order.

- Did it tell them that was no existing consent at the substations site?
- Were its lawyers unaware there was an existing consent for the substations site?
- Did National Grid tell its lawyers to ignore the existing consent?

28. FPC does not think any scenario paints National Grid or its lawyers in a very attractive light.

29. The senior management in National Grid need to reflect upon the way the company is conducting itself. It is not ethical or corporately responsible to ignore requirements and mitigation which already exist because it is not convenient, particularly when a community, which is already paying a very high price, is being deprived of the protection and mitigation which has already been determined. It smacks of an ethical approach which is anything goes as long as you can get away with it. Is that appropriate behaviour for a major public company which is responsible for a key piece of national infrastructure?

END