FRISTON PARISH COUNCIL

NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 13 April 2026

DEADLINE 6 - RESPONSES TO ISH3 ACTION POINTS

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 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. Responses are set out below using the reference number for each action point.

AP1 - *Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.*

1. See responses to ExQ3.

2. At OFH3 FPC made a number of suggestions (with reasons) in terms of reinstating and reinforcing the requirements in the EA2 and EA1N DCOs in relation to the GIS National Grid substation in the draft Sealink DCO as follows.

> *"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 DCO, 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."*

The fourth item has already been addressed in FPC's responses to ExQ3.

In relation to the first two items a new requirement should be included as follows. Please note this wording is derived from the EA2 DCO.

[X] Additional requirements in respect of work number 1B

(1) The fenced compound area (excluding its accesses) for the national grid substation forming part of Work No.1B must not exceed 16,800 m^2.

(2) External electrical equipment comprised within Work No.1B must not exceed a height of 16 metres above finished ground level.

(3) The width of the new permanent access road comprised within Work No. 1B must not exceed 7 metres.

(4) The national grid substation forming part of Work No.1B shall only use gas insulated switchgear (GIS) and no air insulated switchgear (AIS) shall be used.

(5) SF6 gas or other greenhouse gases shall not be used in the national grid substation forming part of Work No.1B where there is an alternative gas even when the alternative gas results in increased costs.

In relation to the third item the **text in the table of parameters in clause 5 (as set out below) should be amended by deleting the the words *"(not including roof mounted equipment)"*.** There was no such exclusion in the EA2 or EA1N DCOs.

16m above finished ground level of 18.5m AOD (not including roof mounted equipment)

Further National Grid should explain how a finished ground level of 18.5 m AOD has been determined.

3. In terms of preserving the all the design, and not just part, of the National Grid substation which has already been approved under the discharge of requirements process for EA2 additional wording is required at the end of paragraph 3(2)(a)

> ***"and generally in accordance with all conditions, requirements et cetera set out in such documents and the EA2 DCO insofar as they relate to Work No.1B."***

4. Whilst there has been some restoration of the working hours requirements currently in place at the substations site at Friston under the EA2 DCO, the amendments made to the draft Sealink DCO still fall short of full restoration because there are other works in addition to Work Nos 1A and 1B which take place on the substations site at Friston. In order to ensure a full restoration across the substations site the wording highlighted in blue below should be added to paragraph 7 (7) in Schedule 3.

(7) In respect of Work No.1A and Work No. 1B, and in respect of any other Work Nos where there will be construction activity on the substations site at Friston (as delineated by the order limits for EA2) construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).

5. At ISH3 in relation to mental health and well-being there was a debate about monitoring the health and well-being of residents. National Grid considered this would not be possible due to being unable to screen out the impacts of Sizewell C on mental health and well-being. However that is to miss the point. For the residents of Friston (and probably those of Saxmundham but it is not for FPC to comment on that subject) the past, current and future damage to their mental health and well-being is almost entirely the result of being forced to live next to a major piece of energy infrastructure (which is a strategic connection point for a multitude of energy projects) and the destruction of Friston's tranquillity, which is never to return. This damage to Friston residents dwarfs any damage arising from Sizewell C. Therefore it is suggested that there is a monitoring requirement, but this is limited to those who live within a specified radius of the substations site, such radius to be of such a size to include at the very least the entirety of the village of Friston and neighbouring residential properties. Accordingly there should be an additional requirement as follows.

[X] Monitoring of mental health and well-being

Every six months, starting with the date this DCO is made, the undertaker shall engage and fund an independent expert mental health organisation ("MHO") to conduct a survey of residents living within [x] kilometres of Work No. 1B to assess their mental health and well-being and the extent to which it is being impacted by the construction and operation of Work No.1B (as defined in this DCO) and Work No. 41 (as defined in the EA2 and EA1N DCOs) and developments which connect to Work No.1B (as defined in this DCO) and Work No. 41 (as defined in the EA2 and EA1N DCOs). The content of the survey shall be independently determined by the MHO after consultation with the undertaker, Suffolk County Council, East Suffolk Council and Friston Parish Council. The results of such survey shall be published by the MHO without prior reference to the undertaker. Following such survey the undertaker will take such steps as the MHO recommends to mitigate the damage being caused to the mental health and well-being of the residents surveyed.

6. In relation to noise and NV12 and NV07 of the REAC it is unclear how these relate to each other and how NV12 replicates the requirements in requirement 27 of the EA2 DCO. FPC does not have the expertise to assess this issue. It would however point out that noise was one of the most contentious issues in the EA2 and EA1N examinations with a number of issue specific hearings on this subject which resulted in the detailed wording of requirement 27. The requirements in relation to noise under the draft Sealink DCO in relation to the National Grid substation must provide the same level of protection as the existing requirement 27 and must not undermine that protection. The following additional requirement should be included in the draft Sealink DCO.

   [X] Operational Noise at the Substations Site

   If the obligations and requirements of this DCO in relation to operational noise at the substations site at Friston result in a breach of requirement 27 in the EA2 and EA1N DCOs, then the design and operation of Work number 1B shall be modified so that full compliance with requirement 27 is achieved.

7. More generally as the ExA is aware FPC is concerned to maintain the existing requirements and mitigation which it already has under the EA2 and EA1N DCOs in respect of the substations site at Friston. However as repeatedly indicated, it is an impractical and unnecessary task for a Parish Council, with very limited resources and expertise, to propose amendments to the draft Sealink DCO so that such existing requirements and mitigation are preserved, in circumstances where National Grid chose to ignore the existing EA2 and EA1N DCOs in respect of the substation site at Friston, despite FPC raising this issue with National Grid during the consultation process and also with the Planning Inspectorate in 2023. This is completely the wrong approach. National Grid should be expected to comply with existing requirements and mitigation, as currently worded in the EA2 and EA1N DCOs. If changes to that wording is required National Grid should be expected to set out in detail what the changes are and why they are necessary.

8. Fundamentally the burden should not be on a poorly resourced Parish Council to preserve existing requirements, controls and mitigation, and thereby distracting it from other issues. The obligation should be on National Grid to maintain the existing requirements and mitigation and draft a form of DCO, so that it is clear on the face of the draft DCO that such existing requirements and mitigation have been preserved.

   AP8 - ***Provide details on how larger vehicles would manage to turn safely at the junction of the A1094 onto B1121 south of Friston. This should include diagrams to show swept paths of larger vehicles including HGVs.***

   FPC is concerned as to what these “larger vehicles” would be if not HGVs.

   The B1121 is meant to have only very limited use for the pylon upgrade works and for no other purpose. Turning left off the A1094 eastbound is very difficult and unsafe because of the geometry. Further turning right westbound across the eastbound carriageway is not without problems, given the blind bend and rise on the eastbound carriageway, the 60mph speed limit and speeding drivers/motorcyclists. Some Friston residents have had “near misses” there.

   AP11 - ***The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.***

At the very least and as indicated above there should be a cap on the B1121 through Friston and Sternfield not just in terms of numbers but also duration.

AP14 - ***Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.***

FPC would not want the B1121 to be used by any HGV traffic or other construction traffic diverted because of the closure of the Benhall Bridge. Construction traffic should be limited for the pylon upgrade works alone.

AP18 ***- If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?*** (emphasis added)

Not only is it likely, but it is already the case that the B1121 through Friston and Sternfield is being used as an alternative route which is having a severe impact. Although categorised as a B road the B1121 is narrow and the verges are already being seriously eroded with damage to culverts etc as vehicles try to pass each other. In parts a 60mph limit is applied but this is far too fast and dangerous given the narrowness and bends. Friston residents have witnessed a significant increase in traffic some of which is going far too fast and having difficulty staying on the correct side of the road particularly on bends. Pedestrians/runners use this road despite there being no pavements, as do cyclists and horse riders.

AP61 - ***Check and confirm in writing whether discharge of backup generators within the SPR consents relates to the National Grid substation or the SPR substations. If the latter, provide an assessment of the implications for cumulative noise and air quality from generators.***

At ISH3 FPC raised the issue of the presence of generators in the EA2 and EA1N substations when National Grid stated that the substations did not contain generators. FPC subsequently checked this issue with Scottish Power who stated there were back up generators in their substations. Please see the exchange of emails with Scottish Power at Appendix 1. Further in Chapter 6 – Project Description in paragraph 428 on page 91 there is a description of the Scottish Power substations which includes “backup generators”. A screenshot of page 91 is attached at Appendix 2.

END - Appendices 1 and 2 below

APPENDIX 1

On 2 Apr 2026, at 12:08, East Anglia Two <eastangliatwo@renewables.scottishpower.com> wrote:

Hi [redacted],

We will operate with two circuits that allow us to be self-powered directly from the wind farm. In addition to this, we have a DNO supply from UKPN, which serves as a backup mains supply for all services, as well as a standby generator. Altogether, this gives us four layers of power resilience, with the generator only activating if all other sources are unavailable.

Hope this helps.

Thanks,
[redacted]

From[redacted]
Sent:30/03/2026
To:eastangliatwo@renewables.scottishpower.com
Subject: Re: Back up Generators
Sorry [redacted] I meant during operation when back up generators may be necessary to keep systems running when there is a power failure.

Best

[redacted]

On 30 Mar 2026, at 15:06, East Anglia Two <eastangliatwo@renewables.scottishpower.com> wrote:

?
Hi[redacted],

Thank you for your email, I hope you're well.

Sorry - can you clarify which phase of works you're referring to? The construction compound is currently being powered by a battery system which is charged up via a generator. This generator kicks in when the battery runs low.

Is this what you mean?

Thanks,
[redacted]

From: [redacted]
Sent: 26/03/2026 17:04:25
To: eastangliatwo@renewables.scottishpower.com
CC:
Subject: Back up Generators
Body:

[redacted] Can you just confirm something for me. I thought there were back up generators at the SPR substations? Can you advise. My understanding is that such generators are necessary to keep systems going in the event of loss of power. Best [redacted]

APPENDIX 2

- Careful siting of the East Anglia ONE North onshore substation and National Grid substation to the west and south of existing woodland blocks to gain maximum benefit from existing screening;
- Careful siting of the East Anglia ONE North onshore substation and National Grid substation in close proximity to the existing overhead lines to reduce additional cabling requirements and to minimise proliferation of infrastructure; and
- Siting the East Anglia ONE North onshore substation and National Grid substation in an area of low flood risk (Flood Zone 1).

427. Further detail on the implementation and micro-siting of the onshore substation siting is provided within the Scheme Implementation Report submitted with this DCO application.

6.7.7 Onshore Substation Infrastructure

428. The onshore substation would be located within a single compound. The onshore substation will be a 'gas insulated switchgear (GIS). Within a GIS substation, equipment is designed to be insulated and cooled by a pressurised gas (e.g. sulphur hexafluoride (SF6)). In addition to the main onshore substation GIS building (see ***Plate 6.24*** for an example of the electrical equipment contained within the main GIS building),the substation compound would contain electrical equipment including power transformers, switchgear, reactive compensation equipment (see ***Plate 6.25*** for example of equipment and building), harmonic filters, cables, control buildings, communications masts, backup generators, access, fencing and other associated equipment, structures or buildings. The onshore substation will have an optimised layout to ensure compliance with the requirements of the draft DCO. ***Plate 6.26*** shows the layout of the East Anglia ONE substation as an example of the arrangement of buildings.