

# FRISTON PARISH COUNCIL



## NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 29 April 2026

### DEADLINE 7 - COMMENTS ON EXAS COMMENTARY ON THE DRAFT DCO

#### 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 comments.
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. Comments are by reference to the number and Article/Schedule number in the ExA's document.

9 – Requirement 3(2) – the ExA states that *“the wording does not require that the scale and layout are the same”*. FPC is concerned that the scale and layout are the same. The entirety of the current design has been signed off by National Grid. Local Authorities and FPC should not have to review the design again. Inevitably there is a concern that National Grid will seek to use this exclusion to make substantial changes under the guise they relate to scale and layout. In fact National Grid designed its substation from the outset so that it could

accommodate the two extra bays required to connect to the Sealink converter station. Representatives of FPC recall having these conversations with National Grid during the consultation process. Accordingly this requirement should be drafted so that the entirety of the design already submitted is the discharged design, except for any changes to the layout required for the two extra bays [to be defined] required to connect to Work No.2. No changes may be made to the Suffolk Substation (Work No 1B) for the purposes of the proposed Lionlink project or any other project proposed to connect at the Suffolk Substation as set out in the TEC register.

12 – Requirement 3(5) – FPC thanks the ExA for seeking to recover a requirement which already exists under the EA2 DCO. However the wording proposed is different from requirement 25 in the EA2 DCO as referred to in FPC’s response to ExQ3, 3GEN30 (REP6 - 262). For example it does not include a specific reference to the need to include measures to minimise lighting pollution and the hours of lighting. Therefore this proposed requirement may not provide the same level of mitigation as the existing EA2 requirement. Friston has dark skies and light pollution is a key concern of local residents both for themselves and wildlife. This was an issue in the EA2 examination and was referred to in paragraphs 82–84 of FPC’s Relevant Representations (RR-1693) which were incorporated by reference and attached to its Written Representations (REP1-193).

15 – Requirement 6 – FPC thanks the ExA for removing the unjustified qualification of “substantially” to compliance with plans. There is no such qualification in the EA2 DCO.

16 – Requirement 7 – FPC thanks the ExA in its overall approach of excluding from working hours Saturday afternoons, Sundays and bank holidays. The existing extensive working hours at the substations site are already causing substantial and constant noise disturbance during the existing working hours, not pleasant in the spring sunshine when residents (a significant number of whom are retired) used to enjoy being outdoors. FPC would like to put on record the significant distress and anxiety to residents which has been caused by the suggestion they will be subjected to seven days a week working. National Grid should apologise.

FPC does have reservations about the extensive list of exclusions to these working hours which are different from the EA2 DCO. FPC does not have the resources to undertake a detailed comparison of these exclusions. FPC relies upon SCC and ESC to pick up on these issues.

FPC is concerned that Works Nos 14 and 16 have not been included in the list of works in subparagraph (7). If National Grid say these works are not relevant to the substations site then there should be no difficulty in them being expressly referred to in subparagraph (7).

20 – New operational noise requirement – FPC thanks the ExA for addressing this issue. FPC does not have the benefit of a noise expert and is therefore engaging with ESC on this subject. One question of concern is in relation to subparagraph (9) which refers to the event that the Friston-Kiln Lane substation (Work no1B) is delivered under Work no2 of this order. FPC does not understand how that might come about. Either the substation is delivered as Work no1B under the Sealink DCO or under the EA2 DCO. There is however a need to make sure that the noise requirements in the EA2 DCO and the draft Sealink DCO dovetail.

**END**