

# 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 DEADLINE 6 SUBMISSIONS

#### 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 submission.
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.

#### DCO – ISSUE I – REP6-005

4. The latest draft of the DCO remains deficient in a number of respects by reference to the representations FPC have made. FPC refers to the submissions it made at Deadline 6 Responses to ISH 3 Action Points (REP6-164) and Responses to ExQ3 (REP6-262). FPC supports the changes suggested by SCC and ESC but has not been involved in the drafting of the suggested amendments and therefore does not necessarily agree with the detailed drafting proposed.

5. FPC welcomes the limited changes which National Grid has made, for example finally reinstating the footprint requirement of the National Grid GIS substation. However it has not removed the exclusion of roof mounted equipment ,which under the EA2 DCO is not to be more than 16m high. Also there is no requirement in relation to the width of the operational access road which now forms part of work 1B (see subparagraph (a)). Under the EA2 DCO it is not to be more than 7m wide.
6. At the risk of repetition all FPC is seeking to achieve are changes which are designed to preserve the requirements and mitigation which already exist under the EA2 DCO and key issues arising from Sealink, principally:
  - a) mitigation in respect of the Sealink and Lionlink AC cables;
  - b) potential switchgear and other noise arising from a multiplicity of connections at the National Grid substation;
  - c) minimising construction and other traffic on the B1121 through Sternfield and Friston relating to Sealink.

### **CONSTRUCTION TRAFFIC MANAGEMENT AND TRAVEL PLAN SUFFOLK - REP6-063**

#### **7. Use of B1121 through Friston**

Friston Parish Council remains very concerned about the impacts of construction traffic, including workers' transport, on the rural road network in and around Friston. Whilst NG have agreed that its use of the B1121 through Friston will be limited solely to works on the pylons/lines amounting to 30 construction vehicles per day. It will be imperative that this is closely monitored and enforced by NG, who do not currently propose monitoring in this location.

#### **Junction of A1094 with B1069 at Blackheath Corner**

8. Of similar, if not greater, concern is the impact on traffic through Friston caused by NG's proposed use of the A1094/B1069 Snape Road junction, which is already at overcapacity with traffic related to the SPR and Sizewell C projects. NG's latest version of the Outline Construction Traffic Management and Travel Plan – Suffolk (REP6-063) at paragraph 6.2.6 states that cumulatively (NG and other projects) between 7am-8am there would be **1,034** vehicles using the Snape Road junction. This will cause severe congestion at this junction and will most likely result in local residents of Knodishall and Leiston being displaced onto Grove Road through Friston, which is the only other viable route. Grove Road is an unclassified road and largely single-track with no footpaths and the additional traffic will pose an unacceptable safety risk as well as a disturbance to residents of this tranquil village.
9. The situation at the Snape Road junction during the evening peak between 5pm and 7pm can only be worse than the morning peak in terms of delay as project related traffic will be leaving the site and travelling southwards to the un-signalled junction with the A1094, where it will need to turn right across the A1094 traffic to travel to the A12. This will cause serious delays and further displacement of local traffic.
10. Indeed there are no junctions on the A1094 with traffic signals. This includes the junction at Snape Common (also the B1069) which is already at overcapacity and where long queues form with vehicles trying to turn left or right onto the A1094. This is exacerbated when concerts or events are taking place at Snape Maltings, which also has a thriving retail centre, busy year round.

11. It is clear that additional traffic related to the Sea Link project using the A1094, even though proportionately small, will create a considerable burden on this route and particularly on the Snape Road junction at Blackheath Corner, causing unacceptable congestion and delays.

#### Benhall Bridge

12. Similarly FPC is concerned about the displacement of traffic during long closures of the Benhall Bridge. This could be overcome and also negate use of the Snape junction if NG adopted SCC's proposal to use the Sizewell C relief road on the northern side of the converter station site. Use of the Sizewell C relief road would also remove the requirement to build an intrusive bridge over the River Fromus near Hurts Hall. FPC therefore endorses and supports SCC's proposal.
13. If NG are unwilling to accept SCC's proposal then FPC would prefer to see Option 1 implemented whereby the Benhall Bridge is repaired/improved to take the higher loading required by the project's traffic. At least this will provide a permanent solution whereas the mini-bridge option has no lasting benefit and will cause intermittent and likely irregular closure, with all the accompanying disruption and delays.

#### **APPLICANTS COMMENTS ON RESPONSES TO SECOND WRITTEN QUESTIONS – REP6-106**

14. In relation to 2GEN 26 National Grid has responded to FPC on page 32. National Grid may have sought to explain the differences between the EA to the DCO and the draft DCO but it has not sought to justify them. Furthermore that explanation demonstrates the sheer complexity of trying to ascertain to what extent National Grid is seeking to resile from the requirements and mitigation in the existing EA2 DCO.
15. In relation to 2CEInter1 National Grid has responded to FPC on page 127 and 128. National Grid again reiterates that there is no information available. That is not true. Information is available in particular in relation to the Helios project but it has not been published. The fact that National Grid and Helios meet is evidence there is information.

#### **APPLICANTS RESPONSES TO THIRD WRITTEN QUESTIONS**

##### **3GEN29**

16. In relation to 3GEN29 National Grid has sought to explain why it cannot comply with the existing planning consent for the substations site. The only minor change relating to Sealink is the requirement for an AC cable route to the north-west of the site. National Grid state:

*“Requiring a developer to adhere to the requirements placed on a consent for a different project with only a minor area of overlapping works is highly problematic and no clear rationale has been presented by any party setting out why this should be required.”*

17. The EA2 consent is for two projects, first the Scottish Power EA2 wind farm and the National Grid substation. This is clearly demonstrated in the terms of the EA2 consent where these two projects are clearly delineated.
18. Stating that there is “*only a minor area of overlapping works*” is completely misconceived. It is not a question of overlapping works. The Sealink DCO is seeking consent for the entirety of the extensive substations site adjacent to Friston (and the operational access road), with the exclusion only of the footprints for each of the EA2 and EA1N substations. This includes all the mitigation at the substations site, mitigation which was determined by the EA2 ExA and

Secretary of State after a long and forensic examination. FPC would point out yet again the statement at paragraph 28.4.4 of the EA2 ExA's report which is reproduced at the head of this submission and below.

*"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)*

19. This is and always has been the rationale for the requirements and mitigation for the substations site remaining the same. To be clear, and there seems to be some confusion on the part of National Grid, FPC is only requesting the terms of the existing EA2 DCO to apply to the substations site and not to the converter station site, the DC cable route, and the AC cable route between the substations site and the converter station site.
20. In fact it is National Grid that has not provided a clear rationale as to why the requirements and mitigation for the substations site should be different. National Grid pleading that it has already agreed to numerous changes is facile given it started from a position which ignored the existing consent.

### **3GEN32**

21. In relation to 3GEN32 there was a similar debate during the EA2 examination in an issue specific hearing, with learned counsel for various parties having a different view as to extent of permitted development rights. National Grid is not infallible when it comes to the interpretation and operation of planning law. Given the different views as to the extent of permitted development rights, and given the evidence that National Grid substation was a connection hub and other projects would connect to it requiring expansion of the substation, the EA2 ExA decided, after careful consideration, that such a requirement should be included and the DCO was made by the Secretary of State on that basis.
22. National Grid were closely involved in the examination and its position on issues was advocated by SPR.

**END**