

FRISTON PARISH COUNCIL



NATIONAL GRID ELECTRICITY TRANSMISSION - SEA LINK PROJECT

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

Date: 29 April 2026

DEADLINE 7 - SUMMARY STATEMENT

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 summary statement regarding matters that FPC has previously raised during examination and that have not been resolved to its satisfaction.
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. This is a summary statement and therefore the comments made are at a high level and therefore should not be considered to address every single matter which has not been resolved to FPC's satisfaction.

Findings of the Examining Authorities for the EA2, EA1N and National Grid Connection Hub, and the draft DCO

5. The current draft of the DCO remains unsatisfactory in respect of the requirements and mitigation secured in respect of the substations site.

6. FPC refers to the findings of the EA2 ExA at the head of this submission and every other submission which FPC has made in the examination. There has not been much evidence that National Grid has paid any attention to these matters. The approach which National Grid has taken to the draft Sealink DCO (despite amendments) flies in the face of these comments. A number of the provisions in the EA2 DCO, in particular the requirements and certified outline documents relating to mitigation, were made to reflect the serious concern which the EA2 ExA had in relation to the development of the substations site at Friston. An example is the 10 year replanting obligation which is in the landscape management plan for EA2. This 10 year period was reached because of the meteorological conditions in the far east of East Suffolk. It can be very dry in the summer and residents know from personal experience how a very dry summer can damage the root systems of relatively immature trees, and even mature trees, resulting in their subsequent death. National Grid can only be resisting this obligation because in practice it will result in work and cost for them, i.e. proving the point that this obligation is necessary.
7. FPC considers it bears repeating that the EA2 DCO was made after a nine-month examination period involving 17 issue specific hearings. Is it really for National Grid to ignore these findings? FPC would urge the ExA to have those findings front of mind when it considers the terms of the development consent which National Grid is now seeking for the substations site. Given those findings there is no excuse for the mitigation at the substations site to be weakened in any way. If anything the mitigation should be strengthened. For example that National Grid via NGET and NGV should not have the ability to have two separate AC cable routes from the converter stations site to the substations site with the associated unnecessary construction impacts and damage to landscape mitigation.
8. In this context it should be noted that National Grid and its advisors, rather starting with the terms of the EA2 DCO, and then setting out how it would like those to be modified, have chosen to ignore those terms, re-draft afresh so that it has been extremely difficult, if not impossible, given the different structure and wording of the DCO, to determine the full extent to which the requirements and mitigation have been weakened. That exercise in itself has wasted the time of the ExA, Suffolk County Council, East Suffolk Council and every other interested party in Suffolk who has engaged in this issue and resulted in unnecessary costs for all parties.
9. There has not been enough consideration as to how the consent for the substations site in the EA2 DCO will interact with the consent for the substations site in the Sealink DCO once it is made. The proposed requirement (requirement 15 (restriction on carrying out works when consented in another order)) should address this issue. However, if the wording proposed by National Grid applies, will National Grid state as soon as the Sealink DCO is made that all works at the substations site (excluding the EA2 and the EA1N substations) will be performed under the Sealink DCO? How will all existing discharges be dealt with? What if, as remains the case, that because of nuances of wording, and because requirements and mitigation have not been replicated, that requirements and mitigation are reduced at the substations site?
10. Accordingly,
 - (i) the recommendation of a form of DCO and the making of a DCO which does not **clearly** maintain or enhance the mitigation at the substations site is unreasonable;
 - (ii) the behaviour of National Grid in seeking a DCO on such terms and its consequent conduct in the examination is unreasonable and all parties other than National Grid should be invited to make a claim for their wasted costs;

- (iii) FPC has had to divert its very limited resources to trying to maintain the existing requirements and mitigation under the EA2 DCO, with the result that it has been unable to focus on other issues which will impact its and neighbouring communities. Therefore it has effectively been denied a fair hearing.

11. Fundamentally the Planning Inspectorate made a very serious mistake in accepting an application with a draft DCO in this form. This is even more unforgivable given it was warned in 2023 by FPC that the EA2 DCO should be the basis upon which National Grid should prepare its draft DCO. FPC is currently considering whether to make a complaint to the Planning Inspectorate and may take further steps depending upon the outcome of the examination and the decision of the Secretary of State.

Traffic and Transport

12. FBC remains concerned that

- a) there is not sufficient precision as to the use of the B1121 through Sternfield and Friston;
- b) overcapacity at the junction A1094 with B1069 will displace traffic onto Grove Road part of which is designated as a “quiet lane”;
- c) extensive works at Benhall Bridge will displace traffic onto the B1121 through Sternfield and Friston. A better approach would be to adopt SCC’s proposal to use the Sizewell C relief road approach the converter station side from the north and not use the Benhall Bridge at all.

Mental health and well-being

13. There is no understanding of how the establishment of a strategic connection point at Friston and the multitude of projects that will connect there has and will continue to impact the health and well-being of the community. The approach which National Grid has taken to the Sealink examination has worsened those impacts.

Cumulative impact

14. The cumulative impact of other projects which are scheduled to connect at the National Grid substation, including the Helios project, have not been assessed despite, in the case of Helios, National Grid having admitted that it has regular meetings with Helios. In its comments on the responses submitted by interested parties and affected persons to ExQ2 (in respect of 2GEN1 at the foot of page 3) (REP6-106) National Grid states that:

“The proposed project will reinforce the electricity transmission network by providing additional capacity that will help accommodate the new electricity generating connections”

15. You cannot justify the “need” for a project based on future generating connections and then refuse to conduct a cumulative impact assessment in relation to developments which are listed in the TEC register and which will require those generating connections.

AC cable routes from Saxmundham to Friston

16. There is clear precedent for cable ducts for another project being installed at the same time. This is acceptable as a matter of planning law where there are related developers. NGET and NGV may operate independently but they are undoubtedly related. A clear opportunity to

substantially reduce environmental impacts and disruption to landscape mitigation will be missed unless the ducts for the Lionlink AC cables are installed alongside the AC cables for Sealink.

Noise

17. FPC remains concerned that:

- a) the noise requirement in the draft Sealink DCO is inconsistent with the noise requirement in the EA2 DCO;
- b) the impulsive noise from switchgear will not be infrequent given multiple connections to the National Grid substation and will result in disturbance at night.

Fire Risk

18. Other than self-serving assertions from National Grid, this issue has not been addressed at all and the absence of an independent fire assessment and the lack of involvement by the Suffolk Fire Service are matters of great concern. Without such an independent assessment the ExA cannot be sure that Friston and residential properties around the substations site are not at risk from a fire at the substations site. This is a major safety issue.

END