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**Our ref:** EuroLink Non-stat Res  
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Dear Alicia Dawson,

### **Response of East Suffolk Council to National Grid Ventures Non-Statutory Consultation on the EuroLink Multi-purpose Interconnector Project**

East Suffolk Council (ESC) welcomes the opportunity to comment on the initial proposals for the EuroLink Multi-purpose Interconnector (MPI). ESC has provided a high-level response within the main section of this letter. More detailed comments on site selection and siting and routing options have been provided in Appendix A.

#### Connection Agreement

ESC recognises that National Grid Ventures (NGV) has a connection offer from National Grid Electricity System Operator (NGESO) in the Sizewell/Leiston area, and that it is proposed that the connection location will comprise the proposed Friston substation consented under the East Anglia One North and East Anglia Two DCOs.

Notwithstanding this connection offer, ESC is not aware of any specific geographical reason why the EuroLink MPI needs to connect in this area. In fact, NGV has recently announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary.

If there is indeed no geographical reason why EuroLink needs to connect in this area, ESC would welcome NGV similarly exploring alternative connection opportunities for this project ahead of the statutory consultation in 2023, out of Suffolk, which could provide greater opportunities for coordination.

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## Offshore Transmission Network Review and MPI

The Offshore Transmission Network Review (OTNR) was announced in 2020 following recognition by Government that the current un-coordinated approach to offshore transmission lacked any strategic vision and was causing significant environmental and local impacts from the associated onshore infrastructure. It was recognised that point to point connections do not necessarily provide the most efficient approach and could become a major barrier to delivery. This is a matter which ESC has been highlighting and calling for action from the Government since 2018<sup>1</sup>.

ESC welcomed the identification of the EuroLink project as a MPI as part of the OTNR which could facilitate the connection of offshore windfarms to an offshore converter station, prior to transporting the electricity to the transmission systems of Great Britain or The Netherlands. This could reduce the amount of onshore infrastructure required for the combined projects. ESC therefore supports NGV's vision for a new generation of interconnectors which will help facilitate much needed coordination within Great Britain, but in particular East Anglia and east Suffolk.

Whilst it is welcomed that NGV are engaging with the OTNR and has secured a partner to facilitate the connection of Dutch offshore wind at the Dutch end of the project, as it currently stands, there are no similar proposals to connect to any UK energy projects. Therefore, at the Great Britain end of the project, the scheme remains for all intents and purposes, a point-to-point interconnector.

Given that MPIs are being considered as one of the coordinated solutions within the OTNR, ESC considers that it would be more sensible to connect the project in a location where there would be the opportunity to connect up with GB offshore wind.

Under the OTNR and the Early Opportunities workstream there is a specific piece of focused work being facilitated by Renewables UK to look at potential solutions for East Anglia. NGV, alongside other developers, has also signed a joint statement committing to exploring coordinated designs in East Anglia and are hoping to identify the EuroLink project as a Pathfinder<sup>2</sup>. It is also noted that EuroLink has been accepted by Ofgem as a MPI pilot project. Whilst these commitments are all welcome, the bottom line is that as part of the current EuroLink MPI proposals there is no offshore coordination at the Great Britain end and no reduction in the extent of the onshore infrastructure compared to that of an interconnector with a radial connection. Given the significant constraints along the coastline of east Suffolk and the high sensitivity of the district's environment, combined with the anticipated generation predicted to require connection in the area in the future, this is not acceptable.

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<sup>1</sup> [Strategic engagement » East Suffolk Council](#)

<sup>2</sup> [Joint statement from North Falls, Five Estuaries and National Grid: Commitment to exploring coordinated network designs in East Anglia - GOV.UK \(www.gov.uk\)](#)

### Local Community and Energy Islands

In addition to attending the webinars and community events held by NGV, ESC held a series of meetings with directly affected town and parish councils to seek their views on the project before responding to the consultation. The views expressed have helped to inform the Council's response. It was clear during the meetings that there is no town or parish council support for the proposal currently being consulted upon. Notes from the meetings have been included within Appendix B.

Energy islands and resultant opportunities were raised in multiple meetings by parish and town council representatives. During the public information events, several members of the local community were given the impression that an energy island was a possible solution which would allow the current project and other energy projects looking to connect in east Suffolk to link to an offshore island and make landfall in a separate and less sensitive location. ESC therefore requires further clarification in relation to this matter and clear guidance on the feasibility of this option as an alternative to what is currently proposed.

### Coordination

ESC also has concerns about the coordination between the EuroLink and other known and planned projects. In addition to the EuroLink project, it is known NGV are promoting a separate Nautilus MPI and National Grid Electricity Transmission (NGET) are promoting the Sea Link project, which all have the same proposed connection location. Alongside offshore coordination, ESC has continued to request that should all the projects proceed, NGV and NGET should work together to ensure maximum coordination between the projects is achieved onshore. Coordination should be sought during all phases of the developments; not just the at the siting and routeing stage, although the co-location and sharing of infrastructure/corridors at the siting and routeing stage is vital. The draft Overarching National Policy Statement for Energy (EN-1) states that the preference should be for coordination and seeks to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure.

Greater coordination could also (if the projects are consented) facilitate infrastructure and construction programmes which could avoid the environment and local communities having to experience the adverse impacts and disruption caused during construction phases for one project, only to experience this again from another consecutively. The consenting of the East Anglia One North and East Anglia Two offshore windfarms and Sizewell C new nuclear power station by the Secretary of State for Business, Energy, and Industrial Strategy (BEIS) only intensifies this need.

The consultation material states that NGV are working with NGET to explore potential opportunities to coordinate. It is also understood that this will be explored through opportunities for co-location, coordination during construction, and offshore infrastructure coordination. ESC is

looking for tangible outcomes from this. In terms of the coordination of design and co-location opportunities, of the four landfall options presented, only one is the same as one of the Sea Link landfall options, and only one landfall is the same as one of the Nautilus landfall options. Of the converter station sites, of the four proposed, only two converter sites mirror those of Sea Link and only two mirror those of Nautilus converter sites. The cable route options similarly identify several routes which do not coordinate with any of the other projects. Therefore, a clear lack of onshore coordination between the schemes remains.

If the EuroLink project is progressed in east Suffolk as proposed, ESC cannot at present see clear evidence of a coordinated approach being taken which raises significant concerns.

### Site Selection

The information provided within the consultation is limited in terms of its level of detail. While it is understood that this in part reflects the early stage of the project's development, the lack of detail in relation to the siting and routeing options has limited the Council's ability to provide detailed comments. In addition to this, whilst acknowledging the existence of other projects, the options continue to be primarily focused on the EuroLink project alone. Siting and routeing options need to reflect the importance of facilitating and maximising coordination, which at present they do not.

Please note ESC is responding to this consultation on the basis that the East Anglia One North and East Anglia Two DCOs bring forward the proposed Friston substation. A Judicial Review of the DCOs was recently dismissed, although it is not yet known whether this judgement will be the subject of an appeal. The siting and routeing options are predicated on these consents and should there be any change to the status of the consents in the future, NGV may need to review the principles underpinning the site selection process for the project. ESC therefore reserves the right to reconsider the comments provided should there be any further legal challenges and decisions.

Notwithstanding the above comments, the Council has provided some comments on both the site selection criteria and the options presented in the consultation within Appendix A of this document. At present, ESC has significant concerns in relation to the different siting and routeing options proposed, none of which are deliverable without significant challenge and adverse impacts. ESC considers that significant further work is required to evaluate the siting and routeing options, including consideration of the factors which ESC has identified as currently missing from the key site selection criteria, before a preferred site can be identified.

ESC has provided comments in relation to the different elements of the project, but ultimately the impacts of the landfall, cable routeing, converter station and connection site must be considered holistically. In addition, it is essential that the full cumulative impacts of the project, as well as

consented, planned, and forthcoming projects, are fully considered and assessed. East Suffolk is facing a significant number of large-scale energy projects, so it is vital the impacts both during construction and operation are comprehensively considered.

### Timing and Format of the Consultation

ESC wishes to note the timing of the consultation has been challenging, given the simultaneous holding of the non-statutory consultation on the Sea Link project and also the consultation on the Sea Link Scoping Report. Whilst the reasoning for the alignment of the consultations is understood, this still presented a significant challenge for local communities to resource engagement across consultations. It should be highlighted that the holding of concurrent consultations has also caused some confusion in terms of the understanding by the local communities of the projects and their differences. This is a matter which will require careful attention going forwards.

ESC welcomes the holding of a combination of in-person and virtual events to inform stakeholders and local communities about the project and the ability to submit comments via a variety of means. Whilst it was noted that significant effort was made to avoid conflicts between the events associated with the two different projects, there was however some overlap, which should be avoided in the future. ESC would welcome the continued exploration of opportunities for coordination in relation to engagement activities on the EuroLink project with the Sea Link project and particularly the consideration of combined events, where appropriate. Engagement on the Nautilus project should also be coordinated, should a connection in this area be pursued.

All opportunities need to be taken to reduce consultation fatigue within the local community. In addition to the consultations occurring on EuroLink and Sea Link, consultations on North Falls and the Scoping Report for East Anglia Green were also held. This is in conjunction with engagement activities occurring in relation to other consented Nationally Significant Infrastructure Projects (NSIPs) in the locality.

Importantly, the timing of the consultation has been difficult as the majority has preceded a decision being made by the High Court in relation to the legal challenge on the East Anglia One North and East Anglia Two Development Consent Orders (DCOs) which was announced on 13 December 2022. The hearings in relation to the Judicial Review were held on 15 and 16 November 2022. Not only would this have created resourcing issues for some parties, but the connection location for the EuroLink project is based on a connection at the proposed Friston substation, which is consented under the offshore wind projects, subject to legal challenge.

ESC would like to take the opportunity to highlight that the next parish/town council and district elections in East Suffolk are due to be held on 4 May 2023, this needs to be taken into

consideration within NGV's engagement plan in addition to the pre-election purdah period. The formal consultation should be held in June at the earliest.

### Summary

ESC has significant concerns about the EuroLink project and objects as currently proposed, in part due to the connection location and due to the lack of demonstratable coordination with partner offshore windfarms and other proposed large-scale energy projects. NGV needs to demonstrate the geographical need to connect in this locality, even though a connection offer has been made given the consideration of an alternative connection location for Nautilus. This need is further strengthened by the spread of the landfalls identified within the consultation which are all of significant concern and will result in undesirable adverse environmental, economic, and social impacts. The fact that landfall locations up to Reydon are being considered illustrates the highly environmentally constrained nature of the east Suffolk coastline. ESC considers an alternative connection elsewhere would enable the potential use of the multi-purpose element of the interconnector to facilitate connection to offshore wind projects.

Setting the above comments aside, if NGV progress the EuroLink project in this area of east Suffolk, onshore coordination must be maximised through coordination with the Nautilus project and NGET's Sea Link project. ESC would urge NGV to focus on siting and routeing options which can facilitate this level of coordination. Based on the information available and current proposals, ESC objects to the lack of demonstratable coordination.

Notwithstanding the above comments, ESC is also of the view that insufficient information has been provided within the consultation to give the Council confidence that the siting and routeing options presented for EuroLink project are viable. There are significant challenges in relation to securing an appropriate landfall, cable route and converter station site for the project and managing and mitigating the impacts at the connection site. ESC considers that further work is necessary to demonstrate the viability of the siting and routeing options proposed prior to NGV identifying a preferred site.

ESC would welcome communication in relation to the formal round of consultation on the EuroLink project to discuss how the issues raised regarding the timing of the consultation could be addressed. It is also recommended that this matter is discussed with the local communities. In addition to this, we would welcome discussion with NGV, NGET, and the Planning Inspectorate at an early stage regarding how the consenting process could be managed.

Finally, ESC would welcome discussions in relation to securing a mechanism to ensure the level of input required can be appropriately resourced.

If you wish to discuss any of the matters raised within this response further, please do not hesitate to contact us using the details above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a large, sweeping underline stroke.

**Philip Ridley BSc (Hons) MRTPI**  
Head of Planning and Coastal Management  
East Suffolk Council

## Appendix A – ESC Detailed Comments on Siting and Routeing Methodology and Options

### 1. Site Selection Criteria

- 1.1. The consultation documentation identifies a list of key criteria which were used for identifying the onshore siting and routeing options. Whilst this list is welcomed, minimal detail has been provided which has limited the Council's ability to provide feedback. For example, it is not clear from the information what specific features, landscapes, assets etc. have been considered and what buffers have been used for these. ESC has provided some comments in relation to the criteria used below and also highlighted additional factors which should have been considered.
- 1.2. *Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast* – This inclusion of this criteria is noted. It is assumed that this would include consideration of the setting of the Area of Outstanding Natural Beauty (AONB) as the effect of development proposed within the designation.
- 1.3. *Public rights of way, byways, and cycle routes* - It is noted that public rights of way and cycle routes have been considered. ESC expect disruption to key routes to be minimised in the project planning, for the benefit of our communities and visitors.
- 1.4. *Residential properties, existing infrastructure, and future developments* - It is welcomed that residential properties have been included within the criteria for site selection, and it is also considered that settlements as a whole should be included. It is not however clear what criteria has been used for avoiding impacts on residential amenity. It is noted that the criterion includes consideration of existing and future developments. It is vital that other large-scale projects which are consented or proposed in the area are fully taken into account during the consideration of the siting and routeing options. This is essential to understand the cumulative impacts of the projects collectively. This is also considered crucial to allow full consideration to be given to maximising coordination. The need for coordination should be ingrained within the siting and routeing criteria and sites and routes chosen with this in mind. As part of this consideration, it is imperative that existing published information is fully considered as there is a significant amount of information known in relation to the grid connection site at Friston for example, already.
- 1.5. The applicant is also required to consider cumulative effects with other committed or consented major projects, principally, but not limited to, Sizewell C and ScottishPower Renewables East Anglia One North, East Anglia Two and East Anglia Three as well as other proposed major projects like Sea Link and Nautilus where there is information available to consider. This project cannot be considered in isolation.

- 1.6. *Local heritage and archaeological assets* - We note the use of the term 'local' heritage, which is presumed to refer to the geographical location of the asset rather than its significance. ESC would like to highlight that all listed buildings are listed by the Government for their national importance. Based on Consultation Document 5.1 *Environmental Constraints Overview: Heritage* it is assumed that the site selection has considered listed buildings at all grades, Grade I, Grade II\* and Grade II, as well as Conservation Areas. It is unclear at this point which factors relating to designated heritage assets have been considered, other than, presumably, distance from the potential sites. Any detailed site selection must include a Heritage Impact Assessment following prescribed methodology set out in advice provided by Historic England.
- 1.7. With regard to archaeology, ESC will defer to SCC's Archaeological Service for detailed comments.
- 1.8. *Ecologically designated sites and sensitive features* - It is noted that this is one of the criteria for site selection. ESC would like to highlight at this early stage that due to the proximity of some of the landfall and cable route options to European designated sites, the shadow Habitats Regulations Assessment (sHRA) will need to consider any potential impacts on functionally linked land (as well as the designated sites themselves).
- 1.9. The overarching ecological principle which must be followed in consideration of options is the mitigation hierarchy. In the first instance ecological impacts should be avoided, only if all avoidance options have been exhausted should mitigation be considered. Only when all mitigation options have been considered should compensation measures be considered. This should form a core consideration within the siting and routing process and the selection of options which avoid ecological impacts must be fully explored and evidenced before consideration is given to available mitigation and then compensation measures.
- 1.10. It is noted that NGV has stated that "ecologically designated sites and sensitive features" have been considered. However, the Environmental constraints overview: Landscape and ecology map (Map 6) provided as part of the consultation only identifies nature conservation sites designated for their international importance (Special Protection Areas (SPAs); Ramsar Sites and Special Areas of Conservation (SACs)). Nationally designated (Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs)) and locally designated (Local Nature Reserves (LNRs) and County Wildlife Sites (CWSs)) sites are not identified and therefore it is unclear whether they have been considered as part of this process. Given the importance of such sites it is essential that impacts on them are considered as part of the project. The consultation documents also do not appear to consider the potential for impacts on UK Priority habitats (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)); protected species or UK Priority species, again these must be considered as part of the assessment of potential options for this development.

- 1.11. *Consideration of flood risk* – It is noted that flood risk has been considered, but it is not clear however as to which sources this is referring to. ESC would like to highlight that consideration should be given to all sources of flooding. Evidence will need to be provided to support the project and demonstrate that flood risk has been fully considered. Please note regard should be had to the outputs of any published surface water management plans in addition to material published by other developers in relation to the same site.
- 1.12. *National and Local Development Plan policies* – There are two Development Plans for the district, the Suffolk Coastal Local Plan 2020 and the Waveney Local Plan 2019. There are numerous relevant policies for consideration within these documents, but attention is drawn to Policy SCLP3.4 ‘Proposals for Major Energy Projects’ in the Suffolk Coastal Local Plan. This policy highlights the need to consider the cumulative impacts of projects but also highlights other factors which should be considered, and which have been highlighted within the Council’s comments on the site selection criteria below.
- 1.13. *Shipping and vessel activity* – Noted and no further comments provided.
- 1.14. *Marine archaeology* – Noted and no further comments provided.
- 1.15. It has been stated in the ‘Next Steps’ section of the Briefing Document that further assessment and survey work will be undertaken in addition to further consideration of the following topics listed below:
- Landscape and views
  - Archaeology and local heritage
  - Flood risk and water quality
  - Traffic and access
  - Ecology and biodiversity
  - Air, light and noise pollution
  - Health and community impacts
  - Engineering
- 1.16. Whilst this is welcomed, no information has been provided in relation to what this will involve. ESC has provided some further comments on some of these matters in addition to some other matters which it is considered should be taken into account prior to site selection being finalised.
- 1.17. *Landscape* - The Council would expect to see a clear methodology for identifying valuable landscape elements and a realistic methodology for identifying the scope for mitigation.

- 1.18. *Traffic and access* - The siting and routeing criteria should include consideration of access routes to serve the different elements of the project and therefore it is welcomed that this will be considered going forwards. ESC however consider that this is such a fundamental issue it should have been considered as part of the initial siting and routeing assessment. It is important that there are suitable routes within the serving highway network to facilitate the moving of large items during construction and maintenance. It is a significant omission from the siting and routeing criteria not to include the consideration of access and impacts on the highway network at this early stage.
- 1.19. *Noise and vibration* - These should be key factors in terms of site selection criteria for both construction of the landfall, cable route, and converter station and connection infrastructure in terms of operational noise. Whilst it is noted that these matters will be considered in subsequent assessments, they are also considered fundamental to site selection.
- 1.20. The converter site will need to be adequately assessed using relevant guidance (currently BS4142:2014+A1:2019 - Methods for Rating and Assessing Industrial and Commercial Sound) whilst also considering appropriate deviations where BS4142 is out of scope and to take account of areas such a low frequency noise if appropriate. The locations suggested are all areas of low background and rural residential character noise and therefore the siting of a development that will introduce a significant and likely out of character long term constant noise source could have a significant adverse impact in that locality, as well as impacting on the general amenity of the area. The substation will also have to be assessed cumulatively where necessary with other projects that are committed, consented, planned, or known. It is expected that this assessment will guide and provide any required mitigation to ensure that the operational noise impact from this development is negligible.
- 1.21. Any extra bay at the proposed Friston substation for the grid connection will also have to be assessed using the same guidance for the same reason and will also have to be subject to a cumulative assessment with the substations for committed and known projects using this site as a connection point including the proposed National Grid substation that would be subject to extension for this project. It should be noted that the connector substation is included in the rating level for the East Anglia One North and East Anglia Two windfarm substations which makes it a site wide constraint to further projects utilising this connection.
- 1.22. ESC's current position on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications but is equally relevant here and has been stated for other DCO projects we are involved with. *Noise from fixed plant or machinery (e.g., heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment*

*should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified.*

- 1.23. Due to the size of these types of projects, the 5dB below background is an aspirational target and one we ask applicants to consider as the appropriate limit. Deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which we will also require robust justification for, this should be in line with all relevant standards, guidance, and policy. NGV is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise noise impact.
- 1.24. Construction noise and vibration will need to be assessed and planned with the relevant guidance in mind (currently BS 5228-1 & 2 :2009+A1:2014 - Codes of Practice for Noise and Vibration Control on Construction and Open Sites.). The areas where the landfall, cable routes, substation, and connection point are suggested are predominantly low background and rural residential character noise areas and therefore compliance with this guidance is expected as a minimum. Where impacts are likely to be significant and/or long term it is likely we will request consideration over and above that in the guidance due to the likely increased duration and scale of impact of a project of this size. Monitoring and mitigation proposals will need to form a significant part of a Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP).
- 1.25. As it is unknown whether noise and vibration has been considered at this point in site selection it is expected that any location for the landfall, cable routes, converter station, and connection point is fully and adequately assessed in terms of noise and vibration impact. It is recommended that designs for all aspects of the project are made with noise and vibration mitigation in mind and consideration should be given to not only the siting of permanent infrastructure (including areas such as joint bays) but also temporary infrastructure such as haul roads and construction compounds. This is a sensitive area and should be upper most in any assessment and decision in terms of site selection going forward.
- 1.26. *Light pollution* - It is unknown whether there has been consideration of other potential nuisance in terms of site selection. It is expected that in terms of operation, the site will be designed sensitively to prevent nuisance in terms of areas such as light, and regarding construction, activities will be carried out in such a way as to prevent nuisance from predominantly light and dust, but also considering any other possible nuisances where appropriate (S.79 Environment Protection Act 1990 – Statutory Nuisances). It is expected

where this has not been considered in site selection it will be adequately addressed in any management plan documents.

- 1.27. *Contaminated land* - There is an expectation that land within the development area will be subject to assessment for land contamination in line with relevant guidance and legislation (including BS10175:2011+A2:2017 and the Land Contamination Risk Management (LCRM)) to ensure that contamination is identified and dealt with appropriately in respect of the development and sensitive receptors both onsite and offsite. The developer should also develop a robust watching brief in order to cover the eventuality that unexpected contamination is encountered and appropriately addressed.
- 1.28. *Air Quality* - There is no information regarding the impacts on air quality in the documents provided. It is important that air quality impact and dust control is considered early on in the project, even if this is initially in outline terms only. In addition, best available technology/best practicable means is requested for equipment and methodology used during the construction and operation of the scheme to minimise impacts on air quality and to reduce the potential for nuisance from construction dust.
- 1.29. Impacts on local air quality and on habitats should be a consideration in siting and routing investigation and decisions, and if this is not considered necessary, the reasons for this should be fully explained. To enable pollutant and dust impacts to be minimised, routes and construction site access roads within specified distances of designated habitat sites and residential receptors (as per the recognised guidance) should be avoided where possible. Out of the current potential converter station sites those with the smallest extent of underground cabling are best for air quality/nuisance as they would result in less dust and reduced emissions.
- 1.30. The main potential impacts of the proposed development on air quality are those associated with the construction phase, specifically associated with the emissions from construction vehicles, particularly heavy goods vehicles (HGVs), and dust from the work itself. Identifying roads for inclusion in the construction and operational air quality assessment should be guided by, but not restricted by, the Institute for Air Quality Management (IAQM) Land Use Planning and Development Control Screening Criteria. It is important to note that due to cumulative effects of the impact from other developments in the area we would expect assessment at vehicle figures well below those included in the guidance. The most sensitive of Highway England's and IAQM traffic speed change criteria should be used for identifying roads for assessment. Construction and re-routed traffic could influence air quality some distance from the development, particularly if this results in increased congestion. As such, the air quality assessment needs to consider the effects of extra traffic and re-routing existing traffic during construction where appropriate. It would be preferable for a dynamic traffic model such as

VISSIM to model the effects of re-routing existing traffic. However, if a static model is used the effects should still be considered in a quantitative assessment.

- 1.31. A sensitivity test for air quality should be undertaken as part of the air quality assessment to establish what the impact of the scheme could be if air quality does not improve in line with government projections. A sensitivity test of impacts with more pessimistic assumptions than government projections should be adopted. The applicant's air quality assessment should ideally use locally derived fleet information on vehicles within East Suffolk for emission calculations. In addition, the applicant's proposed commitments to Euro Standards for construction vehicles should be reflected in emission factor toolkit assumptions used for the construction fleet and an option selected within the emission factor toolkit so that separate emissions data can be developed for buses and rigid/artic HGVs as appropriate.
- 1.32. Although not necessarily relevant at this stage, should this project proceed, ESC requests that the applicant commits to using Euro VI emission standards for all tiers of construction vehicles, and that all non-road mobile machinery (NRMM) used is stage V compliant, and stage IV where V is not possible. A comprehensive dust management plan will be required to be approved by ESC prior to any construction taking place.
- 1.33. The proposed scheme has the potential to negatively impact on local air quality and cause dust nuisance to local receptors. As such, we would expect the impact of construction and operation on local air quality to be considered at both the siting and routeing stage, and at the scheme development stage when detailed assessment should be carried out.
- 1.34. *Health and community impacts* – It is welcomed that further consideration will be given to this topic as part of site selection.
- 1.35. *Engineering* – it is assumed this will relate to the feasibility of the siting and routeing options proposed and different engineering techniques which could be employed to deliver these. Whilst this is welcomed, it would have been helpful for stakeholders to have an understanding of the feasibility of different methods of construction at this early consultation stage.
- 1.36. *Facilitate coordination* - There is no clear criteria which seeks to promote coordination through the site selection criteria by exploring opportunities for co-location and infrastructure sharing, this should be included.
- 1.37. Coastal Protection - ESC highlight at this early stage the need to consider coastal change and the geomorphological impacts associated with the preferred landfall location options in addition to the need to consider any potential interference with strategic coastal management. The site selection process has not taken in to account the vulnerability of the

shortlisted landfall sites to coastal change (i.e., long-term trends of beach recession and cliff erosion). Similarly, the 'Next Steps' box does not list coastal change as one of the '*important topics we need to assess further*'. A thorough assessment of coastal change must be provided. A key document will be the [Shoreline Management Plan 7](#) – including Appendix C- Baseline Processes.

- 1.38. Agricultural Classification - It is considered that the agricultural land classification should be considered within the site selection criteria for the converter station and connection site at the very least, as they would result in the permanent loss of agricultural land. It is important to understand and consider the quality of agricultural land which would be lost during site selection, as it is not possible to mitigate this loss at a later date. The applicant should seek to minimise impacts on the best and most versatile agricultural land, defined as land grades 1, 2 and 3a of the Agricultural Land Classification and preferably use land in areas of poorer quality (grades 3b, 4 and 5).
- 1.39. *Private Water Supplies* - The developer should take measures to identify Private Water Supplies in the vicinity of works so that they can be undertaken in such a way as to prevent impact to those supplies.

## **2. Siting and Routeing Options**

- 2.1. Notwithstanding the Council's overall position on the project and the comments made above in relation to the site selection criteria which has led to the siting and routeing options presented, ESC has provided some more detailed comments on the siting and routeing options proposed. It should however be noted that ESC's ability to provide detailed comments has been restricted by the limited level of detailed information provided within the consultation.

### Landfall Options

- 2.2. It is not clear how and why landfall options A to D were discounted and options E to H shortlisted. ESC therefore requests further explanation and a justification for narrowing down the original list of landfall location to the options now identified.

### Site F – Southwold/Reydon

- 2.3. The site lies within the Suffolk Coast and Heaths AONB and Heritage Coast and sits within the hugely popular tourist destination of Southwold and Reydon. This landfall is also located partly within Easton Marshes County Wildlife Site (CWS) and is immediately to the south of part of Pakefield to Easton Bavents Site of Special Scientific Interest (SSSI). It largely comprises Coastal and Floodplain Grazing Marsh, a UK Priority habitat. The site is also likely to support a range

of protected and/or UK Priority species associated with the habitat types present. The use of this area as a landfall is likely to result in damage and/or destruction of habitats for which the CWS is designated.

- 2.4. In addition to the relevant policies within the Waveney Local Plan, it is important to note that Reydon has a 'made' Neighbourhood Plan which has identified the area where the landfall site is proposed as one of the most valued parts of the countryside for which Policy RNP5 is relevant and seeks to protect.
- 2.5. NGV need to consider coastal change and the geomorphological impacts associated with the preferred cable landfall location options, as well as any interference with strategic coastal management perspectives. No information has been provided on this within the consultation. This landfall option lies within the Environment Agency's coastal management remit and therefore they should be informed. The site also lies within ESC's Coastal Change Management Area which should be carefully considered. A map of the area can be found within the Waveney Local Plan.
- 2.6. From a coastal management perspective, ESC has concerns in relation to landfall F due to the coastal processes in operation and shoreline management plan policy, this frontage is defended and expected to require active management in the short to medium term, involving both ESC and the Environment Agency. The vulnerability of this site to coastal change would become a significant constraint to the project.

#### Site G – Walberswick

- 2.7. The site lies within the Suffolk Coast and Heaths AONB and Heritage Coast and sits within the idyllic seaside village of Walberswick. The site is also in close proximity to Walberswick's Conservation Area. Although this landfall option is not located within any designated nature conservation sites, it is immediately adjacent to part of the Minsmere-Walberswick Special Protection Area (SPA); Minsmere-Walberswick Ramsar Site; Minsmere to Walberswick Heaths and Marshes Special Area of Conservation (SAC); Suffolk Coast National Nature Reserve (NNR) and Minsmere-Walberswick Heaths and Marshes SSSI (to the south-west), and Walberswick Saltmarsh CWS (to the north-east).
- 2.8. It therefore appears that whilst the use of this site as a landfall may not result in any direct loss of, or damage to, any designated nature conservation site, it is likely to result in indirect impacts on the neighbouring sites.
- 2.9. No details have been provided regarding how access to the site would be achieved with the need to cross the Dunwich River, and this causes significant concern. Currently vehicular access is achieved via a very narrow bridge which allows vehicles to gain access to the car park.

This could not provide access for large construction vehicles. It is therefore unclear how access could be achieved to the site without causing additional damage or destruction to the neighbouring ecologically designated sites and the nationally designated landscape.

- 2.10. As with landfall F, no details have been provided regarding the coastal change and geomorphological impacts of the works. This landfall option lies within the Environment Agency's coastal management remit and therefore they should be informed, and their comments carefully considered. The site also lies within ESC's Coastal Change Management Area which should be carefully considered. A map of the area can be found within the Suffolk Coastal/Waveney Local Plan. There are no existing hard defences at landfall G and no plans to provide them.

#### Site H – Dunwich

- 2.11. The site lies within the Suffolk Coast and Heaths AONB, Heritage Coast, and sits within the village of Dunwich, which is known as the lost city of England comprising once a thriving medieval port which was lost as a result of coastal processes. The site is also located near the Dunwich Conservation Area and lies to the north of Cliff House Holiday Park, an established and well used holiday destination. Whilst this landfall option is not located in or adjacent to designated nature conservation sites, it is surrounded to the north, east, and west by UK Priority habitats. Designated nature conservation sites are located in the wider surrounding area.
- 2.12. As with the other landfall sites, no details have been provided in relation to how access for construction vehicles would be achieved. The site is located at the top of a fragile cliff, and it is unclear how construction access would be achieved without causing additional damage or destruction to the neighbouring UK Priority habitats, nationally designated landscape, and nearby uses.
- 2.13. The site also lies within ESC's Coastal Change Management Area which should be carefully considered. A map of the area can be found within the Suffolk Coastal Local Plan. As with landfall F and G, no details have been provided regarding the coastal change and geomorphological impacts of the works.

#### Site E – Aldeburgh

- 2.14. Landfall E is located at the seaside town of Aldeburgh just across the road from the well-known sand and shingle beach. The site is within the Suffolk Coast and Heaths AONB and defined Heritage Coast and therefore during the construction phase the works will likely give rise to significant adverse effects on local designated landscape character and visual amenity. In addition to the high landscape importance of the area, Aldeburgh is also considered of great

cultural significance, once home of the composer Benjamin Britten, inspirational to other famous artists and writers and at the centre of the internationally acclaimed Aldeburgh Festival. The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness.

- 2.15. The site is located within part of the Leiston-Aldeburgh SSSI, which is part of the North Warren RSPB Reserve. The Haven Aldeburgh Local Nature Reserve (LNR) is located immediately to the south-east of the landfall option. The site is also likely to support a range of protected and/or UK Priority species associated with the habitat types present. The use of this area as a landfall is likely to result in damage and/or destruction of habitats and potential disturbance of species for which the SSSI is designated.
- 2.16. This landfall option lies within the Environment Agency's coastal management remit and therefore they should be informed, and their comments carefully considered. The site also lies in close proximity to ESC's Coastal Change Management Area. A map of the area can be found within the Suffolk Coastal Local Plan. As with landfall F, G and H no details have been provided regarding the coastal change and geomorphological impacts of the works which is a concern.
- 2.17. Flood risk must be carefully considered on all landfall sites but particularly the low lying Hundred River valley has the potential for surface water and tidal inundation.
- 2.18. It is noted that this option is the only landfall site which has also been included within the siting and routing options for the Sea Link project and therefore at present would be the only option which would provide opportunities for coordination between the projects.

#### Landfall Options Summary

- 2.19. All the landfall site options identified sit within the nationally designated landscape of the AONB and defined Heritage Coast. The National Policy Statement EN-1 makes it clear that AONBs alongside National Parks and the Broads, have the highest status of protection in relation to landscape and scenic beauty.
- 2.20. There are significant landscape and ecological constraints in relation to the landfall options presented. None of the options presented are without significant environmental challenges which is of great concern. Significant further work is required to understand the potential impacts on the designated sites and functionally linked land. In addition to the requirement for detailed field surveys which will need to be undertaken to understand the presence of protected species. No detail has yet been provided regarding the feasibility and associated impacts of the different trenchless techniques which could be employed at the landfall.

- 2.21. The impact of the works at the landfall on nearby designated heritage assets must also be considered and understood. This is in particular reference to sites G and H which are in proximity of Walberswick and Dunwich Conservation Areas.
- 2.22. Significant further detail must also be provided in relation to traffic and transport and fundamentally how the construction vehicles associated with the works would gain access to the landfall sites. Whilst this would be challenging for all the sites, it would appear particularly difficult at sites G and H. As part of this, greater consideration needs to be given to the popular coastal paths and public rights of way which will be affected by the works. The landfall locations identified are all popular tourist destinations where coastal access is a key attraction. Further detail is required in relation to the design of the works and timings.
- 2.23. The impacts on coastal processes and nearshore change in the proposed landfall areas must be considered in detail. At present, insufficient information has been provided to address ESC's concerns in relation to coastal management. A key reference document is the Shoreline Management Plan 7. ScottishPower Renewables (SPR) as part of their East Anglia One North and East Anglia Two offshore wind farm projects commissioned Royal Haskoning DHV to determine the suitability of their identified cable landfall locations. As part of this a number of reports were published which have been listed below:
- EA1N\_EA2 Sizewell Cable Corridor Development
  - EA1N\_EA2 Sizewell Landfall Erosion Study
  - EA1N\_EA2 Wave Modelling Impact Report
  - EA2 and EA1N\_Review of recent coastal erosion\_July\_2018
- 2.24. The approach taken by SPR to the coastal change assessment is considered to be an example of good practice that should the project proceed, ESC would request is replicated.
- 2.25. Greater consideration needs to be given to the impacts on residential amenity, commercial enterprises and public amenity from the works at the landfall. Construction activities taking place at the landfall site, from previous experience, will necessitate some 24-hour working which could cause significant noise and disturbance to visitors to the locality and adversely affect occupiers' amenity.
- 2.26. At present there is insufficient detail provided to make an informed recommendation in relation to the landfall locations. As identified, they are all of significant concern. However, whilst all options will result in undesirable adverse environmental, economic, and social impacts, ESC would generally favour a landfall which would reduce the lengths of the cable corridors required to reach the converter and connection sites. The fact that landfall locations up to Reydon are being considered illustrates the highly environmentally constrained nature of the east Suffolk coastline.

2.27. In addition to generally favouring the shortest cable corridor, ESC would also support the maximisation of all opportunities for coordination should this project and the Sea Link project both come forward. For this reason, ESC would support the co-location of the landfall with Sea Link and Nautilus (should the project connect in this locality) in order to minimise the spread of the adverse impacts. The opportunities for coordination should not be limited to co-location opportunities, full consideration must also be given to coordination or construction works and any opportunities to share temporary construction infrastructure.

#### Cable Routeing Options

2.28. As stated previously, the limited and high-level nature of the information provided in relation to the consultation has limited our ability to provide detailed comments on the options presented. Whilst a guess can be made, it is not clear which underground cable search areas relate to which sites. In addition to this no details have been provided in relation to the width of the High Voltage Direct Current (HVDC) and High Voltage Alternating Current (HVAC) corridors.

2.29. It is understood that flexibility needs to be inbuilt into the project at this early stage, however the vast areas identified for the cable routeing has made the provision of detailed comments, given the size of area, not feasible within the time scale.

2.30. ESC would like to note that there will be (temporary) impacts on coastal geomorphology and public access from cable laying /construction activities (i.e., digging trenches to connect to the coastal landfall). ESC would want to see detail about monitoring and mitigation of any construction, operational or decommissioning induced coastal change, and coastal access.

2.31. The onshore cable search area from all four landfall options crosses areas designated for their national and international nature conservation importance. This includes the route:

- from Landfall E crossing the Leiston-Aldeburgh SSSI and being adjacent to the Sandlings SPA;
- from Landfall F crossing the Minsmere-Walberswick SPA; the Minsmere-Walberswick Ramsar Site; the Minsmere to Walberswick Heaths and Marshes SAC and the Minsmere-Walberswick Heaths and Marshes SSSI;
- from Landfall G crossing the Minsmere-Walberswick SPA; the Minsmere-Walberswick Ramsar Site; the Minsmere to Walberswick Heaths and Marshes SAC; the Suffolk Coast NNR and the Minsmere-Walberswick Heaths and Marshes SSSI; and
- from Landfall H crossing the Minsmere-Walberswick SPA; the Minsmere-Walberswick Ramsar Site; the Minsmere to Walberswick Heaths and Marshes SAC; the Westleton Heath NNR and the Minsmere-Walberswick Heaths and Marshes SSSI.

- 2.32. The cabling works have the potential to cause damage and/or destruction of habitats and potential disturbance of species for which the sites are designated for. A significant number of non-statutory designated nature conservation sites and areas of UK Priority habitat are also located within the cable search area and may therefore be impacted by construction activities.
- 2.33. Any preferred cable route options will need to be subject to arboricultural survey and impact assessment (BS5837:2012) as well as hedgerow survey (according to criteria set out in 1997 Hedgerow Regulations). This is necessary in order to understand the potential impacts of the selected route, and to inform required mitigation. Notwithstanding this, the cable routes all have the potential to cause extensive impacts on landscape character and visual amenity. Significant proportions of the cable route options are within or border the designated AONB.
- 2.34. Whilst the consultation material states that residential properties have been taken into consideration, this does not appear to be reflected within the cable corridors identified, which rather than excluding settlements, clusters of residential properties and individual properties appears to deliberately include them. The southern cable corridor for example includes the residential areas of Warren Hill Lane, North Warren and Friston village. Cable corridors should be identified to avoid interaction with residential properties and to take into account the disruption and disturbance which will be caused during the construction works.
- 2.35. The cable corridors also do not appear to have taken into the consideration the impact on businesses operating in the area.
- 2.36. In general, the route options involving landfall considerations at Dunwich, Walberswick and Reydon involve notably longer cable corridors with the potential for more extensive impacts on landscape character, visual amenity and residential amenity. Much if not all of these longer routes would fall within the AONB or its setting.
- 2.37. The cable corridor from landfall E is however also significantly constrained. The crossing of the B1122 should landfall E be proposed is a known pinch point in the cable corridor which will require very careful consideration. Not only is the cable route heavily constrained by ecological and landscape designations to the east, but in this area works have the potential to be in proximity to residential properties, interact with the golf club but also have the potential to cause significant disruption to one of the main routes into the town of Leiston. The corridor also remains within the designated AONB for the majority of its length.
- 2.38. The cable corridors are all constrained and would be significantly challenging to deliver. ESC broadly supports the principle of seeking to reduce the cable route lengths as far as practicably possible in so far as it must generally and reasonably be recognised, the shorter the cable

route, the more limited the potential for adverse impacts. It is however recognised that this must be balanced against the impact caused by the concentration and potential intensification of the construction works in a confined area.

### Converter Station Options

2.39. It is noted that the converter station sites shortlisted within the consultations are 1, 3, 4, and 5. ESC has provided some comments in relation to each of the shortlisted sites.

#### Site CS1

2.40. CS1 comprises gently rolling countryside with a regular pattern of field boundaries, woodlands and coverts which are features typical of the Estate Sandlands<sup>3</sup> landscape character type which the site falls within. The A1094, which comprises the main road into Aldeburgh sits to the south of the site with the land gently rising to the north. The Suffolk Coast and Heaths AONB lies to the south of the A1094 and also to the east almost bordering the site. The site is therefore regarded as being in the setting of the AONB, this cannot be overlooked. This issue will need to be fully assessed and addressed in subsequent impact assessments. Any harmful impacts to the adjacent ancient woodland of Great Wood, located on the eastern boundary of the site will not be acceptable. Any screening mitigation required to make this location acceptable in visual impact terms must also be fully appropriate to the prevailing local landscape character and will be expected to achieve habitat connectivity wherever possible.

2.41. Whilst there are no designated nature conservation sites within the boundary of this site, the ancient woodland of Great Wood is a designated County Wildlife Site and therefore forms a constraint to locating a converter station on this site.

2.42. Billeaford Hall (Grade II) is near CS1. Although separated from the site by small, wooded areas, the addition of new tall industrial structures has the potential to affect the wider setting of the listed building. There is also a historic track way known as Sloe Lane which provides access to Billeaford Hall and connects to Knodishall to the north. The impact of the works on these assets would need to be robustly assessed.

2.43. There are some properties which border or are in proximity to the site which would need to be carefully considered in terms of the effects of the development on their amenity. The site, as with all the sites, sits in a rural area with low background sound levels.

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<sup>3</sup> [Estate sandlands - Suffolk Landscapes](#)

- 2.44. The site predominantly comprises grade 4 agricultural land although there is an area of grade 3 land within the northern section. It is not known whether the land is grade 3a or 3b, the loss of the best and most versatile agricultural land should be minimised.
- 2.45. Whilst details of the access arrangements to the site have not been provided this would involve the use of the A1094, although this is an A road, it is also the main road utilised by residents, visitors and tourists visiting Aldeburgh and potentially Thorpeness. Whilst this road is busy all year round, it is especially busy during the summer months. The site is also bisected by a bridleway and footpaths which will be adversely affected by the development potentially permanent requiring diversions.

#### Site CS3

- 2.46. Saxmundham is an historic market town set in the valley of the River Fromas, a tributary of the River Alde. Site CS3 lies to the east of the town and is detached from the setting of the AONB. The site is bounded to the north by the Leiston-Saxmundham Road (B1119) and to the south by a woodland block and occupies an elevated position in the landscape. The land to the north and east of Bloomfield's covert is open arable land. Modern commercial farming practice since the mid-20th Century has stripped the landscape of most key features such as field boundary hedgerows, hedgerow trees and small woodland blocks, therefore in this respect the potential for adverse landscape impact is less severe than for other sites. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands<sup>4</sup> landscape type, of which this area is part. This can be seen on the historic Ordnance Survey maps, there may therefore be the opportunity to reinstate some of these habitats and landscape features across the wider converter station area, should this site be selected.
- 2.47. It is important to highlight however that notwithstanding the potential to provide significant planting on this site, the visual impact of the development will be hard to mitigate during construction or in the early years after construction due to the open nature of the landscape.
- 2.48. Whilst there are no designated nature conservation sites within the boundary of this site, a number of mapped UK Priority habitats are located around the site and therefore will form a constraint to locating a converter station on this site.
- 2.49. The site is adjacent to Wood Farmhouse (Grade II). Due to the openness of the site, the setting of the listed building would undoubtedly be affected by the development. While there is

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<sup>4</sup> [Ancient estate claylands - Suffolk Landscapes](#)

opportunity for mitigation landscaping, this would itself become a boundary between the listed building and its currently open setting. The Church of John the Baptist (Grade II\*) stands on the eastern edge of the Saxmundham Conservation Area, on lower ground. While the church is some distance from the site, the setting of a church is generally extensive and therefore the contribution of its wider setting to its significance should be taken into consideration.

- 2.50. The western boundary of CS3 sits in proximity to Manor Gardens, a close of residential properties, there are some sporadic residential properties accessed from the B1119. Although the comments regarding opportunities for reinstatement of the landscape features are valid, this site is very open at present and therefore the development will have a significant visual impact on the early years. The impact of construction works on residential amenity will need to be carefully considered in addition to the impact of the operational noise in this quiet rural environment.
- 2.51. The site predominantly comprises grade 3 agricultural land although there is an area of grade 2 land within the northern section. It is not known whether the land is grade 3a or 3b, as previously stated the loss of the best and most versatile agricultural land should be minimised.
- 2.52. There are also footpaths which cross the site which would require diversion potentially permanently.
- 2.53. Details regarding how the site will be accessed both during the construction phase and operational phase has not been provided, this is considered a significant constraint to the use of this site. It would not be appropriate to route construction traffic through the town and Saxmundham and the heavily constrained and often congested crossroads within the centre, even if it was considered technically possible.

#### Site CS4

- 2.54. CS4 comprises the former Leiston airfield and adjacent land and lies within the Ancient Estate Claylands landscape character type. Much of the former field pattern was removed to allow for the construction of the airfield, parts of the site therefore have reasonable capacity to take a converter station in terms of potential impact on landscape character and visual amenity. There are however areas of the site which retains more of their traditional field pattern depicted by hedgerows and hedgerow trees which would potentially be lost if the site was developed. There are also areas of plantation woodland which will comprise constraining features.

- 2.55. Dependent on the land take required this site, the development could have significantly different impacts on landscape character, in some areas the potential landscape character erosion could be fairly high. It is however important to highlight that the existing trees, hedgerows and woodland could provide useful screening potential. Any new planting for screening purposes is likely to integrate well with existing landscape character. The Suffolk Coastal Landscape Character Assessment however cautions against development of the plateau landscape.
- 2.56. One designated nature conservation site is located within the boundary of this site, Leiston Airfield County Wildlife Site. Theberton Woods County Wildlife Site is also located on the site's northern and north-western boundary. These sites therefore form a significant constraint to locating a converter station on this site. Parts of the site comprise of arable fields separated by a large tree/hedge-line, roadside hedgerows are also present on much of the boundaries. This vegetation also provides important ecological features on the site. The presence of any protected and/or priority species (including farmland birds) will also need to be assessed.
- 2.57. Site CS4 is near Peakhill Cottages (Grade II) and Moat Farmhouse (Grade II). There is limited intervisibility between the listed buildings and the site, however the addition of new tall industrial structures has the potential to affect the wider setting of the listed buildings.
- 2.58. The site comprises grade 3 agricultural land, as previously stated, it is not known whether the is grade 3a or 3b but again the loss of the best and most versatile agricultural land should be minimised.
- 2.59. There are some residential properties neighbouring the site which could be adversely affected by the development dependent on its location. There is also a public right of way which bisects the site and another right of way which appears to border the site.
- 2.60. Details of how the site would be accessed have not been provided, the transport network surrounding the site currently comprises small rural roads. The Sizewell C project includes the construction of the Sizewell Link Road which could provide a more appropriate means of access during construction and operation of the site. Whilst this is expected to be provided within the Early Years of the construction programme of Sizewell C and therefore will potentially be available, access to the site would remain a significant constraint until it was.

#### Site CS5

- 2.61. This area is to the west of Knodishall and falls within a landscape that has a notably rural character with areas of modest to small sized fields bordered by intact hedgerows, hedgerow trees, copses and small woodland tree belts. The area retains a reasonably intact pattern of

historic field boundaries with later plantations and secondary woodlands, it is part of the Ancient Estate Claylands landscape type. The lack of intrusion from modern development is noted in the Suffolk Coastal Landscape Character Assessment. Development of this area is likely to lead to a notable loss of key landscape character features such as hedges and trees which cannot be mitigated in a like for like basis. However, existing hedges and tree belts offer screening potential if retained and therefore any development would need to be accommodated within the existing pattern of enclosures and woodlands, which is considered unlikely. New screen planting has the potential to be successful but, in this landscape, it would need to be well sited as extensive planting carries the risk that the planting may be out of character. There is a significant concern that for the planting to be effective and achieve its screening purpose, it has the potential to consequently have an adverse impact on landscape character.

- 2.62. Whilst there are no designated nature conservation sites within the boundary of this site, a number of mapped UK Priority habitats are located around the site and therefore will form a constraint to locating a converter station on this site. The Hundred River also runs along the eastern boundary of the site. Given the presence of this variety of habitats on and around the site it appears more likely that ecological impacts will arise if it is selected as the converter station site. In particular, it appears unlikely that all of the existing vegetation could be retained as part of the development proposal and therefore any scheme would need to address this. The presence of any protected and/or priority species (including farmland birds) will also need to be assessed.
- 2.63. The proximity of Knodishall village would likely give rise to adverse impacts. CS5 is particularly sensitive from a built heritage perspective, being in close proximity to the Church of St Lawrence (Grade II\*), the Knodishall War Memorial (Grade II), Knodishall Place (Grade II) and Pattle's Farmhouse (Grade II). The site is contained between two small historic settlements on Church Road and Grove Road, with the church as a landmark which is experienced in the same context as the site from many viewpoints. The setting of the church is far-reaching, and the potential for impact on its setting is therefore great, with little potential for mitigation.
- 2.64. As stated previously, the Hundred River runs along the eastern boundary of the site and therefore not only does the site include a Main River but areas of the eastern edge of the site fall within Flood Zone 3. Not only will flood risk need to be very carefully considered, but there will also be policy implications with the requirement to undertake a Sequential Test.
- 2.65. The site comprises grade 2 agricultural land. As previously stated, the loss of the best and most versatile agricultural land should be minimised.

- 2.66. The site also includes monument record KND 004 which is the site of a roman villa which has been identified through field walking but not investigated or defined. SCC Archaeological Service will provide more detailed information on this site, but further work will be necessary to determine the site's significance and whether preservation in situ is necessary.
- 2.67. No details have been provided regarding how the site would be accessed. Whilst the Saxmundham Road (B1119) runs along the northern boundary this would require construction vehicles to travel through either Saxmundham town or Leiston town, neither of which would be desirable. There are also public rights of way running through the site which may require diversion.

#### Summary of Converter Station Site Options

- 2.68. The converter station site options all have their challenges, and will all result in adverse impacts albeit to a greater or lesser degree – no weighting has been ascribed by the Council at this stage. They are all located in quiet rural areas where the potential operational noise from a converter station would be out of character and require appropriate mitigation. The sites are also predominantly served by narrow rural roads, it would need to be demonstrated that the local network could accommodate the expected construction and operational traffic in addition to the cumulative traffic. It is however not possible to consider the converter station search area options in isolation from the cable route and landfall options, as without an appropriate option for all three the project is not viable. The above comments would therefore need to be considered holistically alongside the comments provided in relation to the cable route and landfall.
- 2.69. Good design must be an essential component of the project. The importance of design has also been reflected within the draft Overarching National Policy Statement for Energy (EN-1) which encourages the seeking of professional advice on design aspects of the scheme. Design input should be sought at an early stage and continue throughout the consenting and post-consent phases. Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the EuroLink project alone, and in a coordinated scenario.

#### National Grid substation and connection infrastructure

- 2.70. A fundamental element of the project which must be considered as part of the siting and routeing options is the project's grid connection and implications of this. As previously indicated, this response has been drafted based on the assumption that the National Grid substation is constructed under the East Anglia One North and/or East Anglia Two projects or

another project and the EuroLink project will propose an extension to facilitate a connection to the grid.

- 2.71. Greater information needs to be provided in relation to the implications of the connection of the EuroLink project to the proposed National Grid substation, including whether this would affect the technology employed within the infrastructure i.e., air insulated switchgear (AIS) or gas insulated switchgear (GIS). The use of different technologies would have significant implications, especially for the footprint of the substation. It is understood that sulphur hexafluoride free GIS substations are being developed and therefore the possibility of this option should be explored.
- 2.72. The proposed National Grid substation location is a sensitive site, with its historic landscape character, proximity of listed buildings, proximity to residential properties and the settlement of Friston, flood risk, public rights of way and quiet rural positioning. The ambiguity of the routing for the cabling around this sensitive site makes providing detailed comments very difficult. Any cabling or extension to the proposed National Grid substation would require full assessment including cumulatively with the East Anglia One North and East Anglia Two projects. Careful consideration would need to be given to prevent prejudicing mitigation associated with these projects. In addition, the cumulative impacts of other future connections also proposed at the site would need to be considered.
- 2.73. Significant amounts of information were submitted as part of the East Anglia One North and East Anglia Two DCO examinations which should be carefully reviewed and taken into consideration. The Examining Authority concluded that the extension of the National Grid substation would intensify and worsen the effects of the East Anglia One North and East Anglia Two schemes on both the local landscape and on visual receptors. The full extent of the anticipated landscape and visual impacts of the additional infrastructure will need to be fully understood but it is clear that the effect will be adverse.
- 2.74. There are a number of residential properties which surround the Friston site. In relation to operational noise, the extension would need to be assessed using the guidance as indicated previously and will also be subject to a cumulative assessment with the infrastructure associated with committed and known projects using this site as a connection point. It is expected that this assessment will guide and provide any required mitigation to ensure that the operational noise impact from this development is negligible.
- 2.75. The impact of the National Grid Substation on the surrounding heritage assets at Friston has been discussed at length by ESC. At the scale that the substation has already been considered, there will be adverse impacts of various magnitudes on Little Moor Farm (Grade II), High House Farm (Grade II), Woodside Farm (Grade II), Friston House (Grade II), Church of St Mary

(Grade II\*) and the War Memorial (Grade II), and it will cause the loss of a historic track which is considered a non-designated heritage asset. Should the National Grid Substation at Friston need to be extended, this would likely worsen the impacts on these heritage assets. The extent of the worsened impact is not currently known and would depend on any increase in scale of the substation, increase in infrastructure and changes to the landscape mitigation scheme.

- 2.76. Friston village has been subject to surface water flooding on multiple occasions. A Surface Water Management Plan (SWMP) for the catchment of Friston village was commissioned by Suffolk County Council (SCC) as the Lead Local Flood Authority. This includes a detailed assessment of the catchment topography and characteristics to accurately model surface water flow paths. There is the potential for the development to interact with the flow paths identified by the SWMP. The project will also have implications for the drainage solutions identified at the Friston site including requiring the removal of one of the consented drainage basins to accommodate the National Grid extensions.
- 2.77. Further details are also required in relation to how the site will be accessed during the construction and operational phases.
- 2.78. The level of ambiguity in relation to the cable corridors and infrastructure is particularly concerning in the Friston area. The East Anglia One North and East Anglia Two DCOs will result in cabling coming into the Friston site from the east, in addition to the significant works proposed as part of the construction of the three consented substations, the proposals could result in cable corridors and therefore construction works surrounding the village.
- 2.79. The local community has been subjected to several years of uncertainty as a result of the East Anglia One North and East Anglia Two DCOs, the current consultation proposes to increase the amount of infrastructure in the area but provides little information in relation to how this would be achieved. NGV should be aware of the detrimental impact this will be having on the local community living in this area. ESC requests that in addition to further detailed information being provided, there is direct engagement with the local communities.

#### Cumulative Impacts

- 2.80. It is essential that the full cumulative impacts of the EuroLink project in combination with other consented, planned and forthcoming projects are assessed and fully taken into consideration. The cumulative impacts of all these projects are a significant concern, and it is vital due to their magnitude that projects are not considered in isolation. The assessment should include consideration of where the consenting of this project prolongs impacts in an area that has or is to be vacated by another project.

## Coordination

- 2.81. Notwithstanding ESC's position on the project, should EuroLink proceed, ESC requests maximum coordination between this project and the Sea Link and Nautilus projects, should they also proceed. The co-location and potential sharing of infrastructure should be fully explored along the whole of the onshore area. The draft Overarching National Policy Statement for Energy (EN-1) states that the preference should be for coordination and seeks to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. This is supported by the work being undertaken by the BEIS-led OTNR. All projects are considered in scope for the Early Opportunities workstream. It is understood NGV is already engaging with BEIS in relation to this review. ESC wants to see tangible outcomes from the OTNR in relation to securing opportunities for both offshore and onshore coordination.
- 2.82. The search area is a heavily constrained fragile area of the coastline and therefore it is important for developers to demonstrate how they have coordinated with other nationally significant developments also looking to make landfall in this area, to seek to maximise the sharing of infrastructure and coordination of construction programmes.
- 2.83. In addition to the landfall, ESC requires the maximisation of coordination across the whole onshore area. There are significant opportunities at the converter station site and connections site to use good design to help deliver a development which seeks to minimise its adverse impacts on the landscape. There are also opportunities for cable sharing to reduce the swathes of the countryside which are dug up and the disruption caused.
- 2.84. Greater coordination could also (if the projects are consented) facilitate infrastructure and construction programmes which could avoid the environment and local communities having to experience the adverse impacts and disruption caused during construction phases for one project, only to experience this again from another consecutively. The need for coordination is now even more pressing with the consenting of the East Anglia One North and East Anglia Two offshore windfarms and Sizewell C by the Secretary of State.
- 2.85. The value of coordination will potentially be markedly diminished if mitigation newly installed to address impacts arising from one project is subsequently removed to accommodate the following project, and any subsequent one after that. This needs to be an important consideration.
- 2.86. ESC objects to the current uncoordinated approach to the development of the EuroLink project.

### Projects Wide Comments - Socio-economics

- 2.87. The EuroLink project has the potential to adversely affect the east Suffolk economy throughout its lifecycle. The construction works at the landfall and along the cable corridor in addition to the construction works and permanent infrastructure at the converter station site and connection site will have an alone and cumulative effects that is of significant concern.
- 2.88. The visitor economy is one of largest sectors in east Suffolk, contributing c. £700m to the local economy annually and supporting around 11,000 (FTE) jobs. This accounts for 15% of all employment in the district. The continued success of the visitor economy is dependent on its reputation as a holiday destination, and the overall experience offered to visitors. The East Suffolk Visitor Economy Strategy identifies that together, the coastline, towns and places, natural landscape, and cultural offer present a compelling experiential proposition for the visitor.
- 2.89. ESC is concerned that the cumulative impact of EuroLink in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination and therefore negatively affecting the visitor economy throughout the lifetime of the project(s).
- 2.90. The impact of the EuroLink scheme will not be limited to the immediate vicinity of the proposed landfall, converter station, connection infrastructure and cable corridor locations. There is a high degree of interdependency between visitor destinations, employment, and supply chains within east Suffolk. Visitors move from destination to destination, employees need to access their employment, and the potential for the displacement of visitors during construction should not be ignored.
- 2.91. Should this project proceed, it is essential that this impact is appropriately considered, and sufficient mitigation is provided to support the continued success of the visitor economy. This might include practical measures such as co-locating HVDC projects, appropriate timing of construction activity, and a contribution towards public relations activity that preserves the reputation of the district as a holiday destination.
- 2.92. ESC notes and welcomes the potential opportunity that EuroLink presents in generating 'direct and indirect temporary employment, training, and apprenticeship opportunities both on site and in the supply chain during the construction, maintenance, and decommissioning phases of the scheme.' However, the Council would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment within the visitor economy and wider business population are suitably assessed and mitigated. The Council is interested in the

opportunities to improve awareness of the wider energy sector across east Suffolk and the high value/high skill employment and apprenticeship opportunities available. Greater information about workforce planning for the EuroLink project is required.

- 2.93. ESC however must balance the potential benefits which may result from the temporary employment, training, and apprenticeship opportunities created against the disbenefits of the project.

**Appendix B – Notes from Town and Parish Council Meetings held on 28 November 2022 to discuss the Sea Link and EuroLink projects.**

**Meeting 1 - 09:30-10.30**

<b>Town/Parish Council</b>
Dunwich Parish Meeting
Walberswick Parish Council
Tunstall Parish Council
Southwold Parish Council
<b>Ward Members</b>
Councillor David Beavan - Southwold
<b>East Suffolk Council Attendees</b>
Councillor Craig Rivett – Deputy Leader and Cabinet Member for Economic Development
Philip Ridley – Head of Planning and Coastal Management
Naomi Goold – Energy Projects Manager
Beth Rance – Energy Projects Planner
Kimya Piper – Energy Projects Coordinator

**Suggested Agenda Items:**

- Landfall
- Cable Routes
- Converter Station Options
- Grid Connection
- Coordination Opportunities

**ESC** – introduction and short presentation before opening up meeting for questions and comments.

**Walberswick Parish Council** -It is hoped this meeting is first of many, increasingly important that East Suffolk Council (ESC) meet with towns and parishes to hear from them. Sore spot for parishes that ESC has sold out the coast, formerly Suffolk Coastal, very little attention given to impact of NSIPs in a small geographic area compared to the wider administrative district of East Suffolk. ESC needs to do more work on NSIPs. There was a difficult meeting with MP held on Friday 25 November, MP was much more direct about who she represents, lots of feelings expressed that a small area of special coast has been sold out to the developers (AONB, SSSI, etc).

Walberswick Parish Council are wondering how much ESC has already been told about the projects, are discussions with developers happening? Some parishes did not know the consultation events

were happening, flyer drops with limited awareness. There should have been more awareness about this event in advance. ESC has been a big supporter of Sizewell C, which is one of the reasons all other NSIPs are coming here, should have been duty of ESC not to be a big supporter, by being a supporter and fairly neutral on Friston substation, this is inviting other projects in and creating over-development. ESC should have championed cumulative impact more. ESC should represent parishes, and this is not happening. EA1N and EA2 delay for two years, yet more infrastructure still coming into Suffolk.

**ESC** – in terms of information sharing, ESC engages with developers but is subject to confidentiality issues. ESC had not seen a map of EuroLink proposals in advance of consultation publication.

**ESC** - ESC has organised the meetings to facilitate best engagement of smaller groups of towns and parish councils, giving everyone opportunity to speak. Clarification of stance for Sizewell C – ESC remained neutral and did listen to parishes having held several events. ESC is a statutory consultee – we do not invite developers into the area. ESC is also feeding into Offshore Transmission Network Review (OTNR) and stressing importance of coordination, getting the best deal we can get if projects do site here. We are not decision makers nor promoters.

**ESC** – fully understand point on cumulative impact and that is a significant challenge going forward. EA1N and EA2 delay has been noted – the developer missed previous Contracts for Difference Funding rounds and so is looking to apply; delay is not a significant shock given the need to seek CfD and current legal challenge.

**Walberswick Parish Council** – helpful to be engaged with and feel like parishes are influencing ESC response. Previous engagement has felt less meaningful; Sizewell C opposition from parishes was not represented by ESC public positioning. People knew before parishes that consultation was happening, people received notification of consultation the day before it started – but venues had already been booked, consultation documents were ready, parishes felt blindsided. Difficult then for elected representatives.

EA1N and EA2 delay - as a consequence of that, Friston also going back two years (but not confirmed in writing), concurrent with delay in offshore supply to it – is ESC aware? Is there a consequence for EuroLink and SeaLink? Friston is central to the hub and converter stations here. New information just learned – no offshore wind being connected from the UK.

**ESC** – the developers organised and booked events, ESC had seen an engagement plan so knew consultation was coming, but new previously unseen site options not known in advance, only shared an approximate strategy (leaflets etc).

Substation – EA1N and EA2 being delayed would cause delay to National Grid being constructed, the substation cannot be built if EA1N and EA2 are not constructed. SeaLink will either extend the substation or include the option of building a new substation in Friston should EA1N and EA2 not come forward. There is no consent in the absence of EA1N and EA2 coming forward for the National Grid substation coming forward. Delay could be beneficial; technological advancements might allow exploration of different technologies for the Friston substation.

No UK wind connecting is disappointing and we understand unless there is a subsequent agreement with the Netherlands to reduce the level of offshore wind capacity they wish to connect, unlikely that we would get any.

**Tunstall Parish Council** – graduated swathe maps look alarming, need detail on what those sites on the ground would look like (construction, cables underground). Who is funding these projects? Strange global situation, energy security is a huge concern for the future. If other countries are funding these projects, potential geopolitical concern.

**ESC** – the cable corridor will be located within the swathe. HVDC cable corridors tend to have narrower width than HVAC cable corridors. Sea Link contains more information on cable corridor widths. For example, HVAC 60m width for one project, 100m width for a shared cable route if coordination taken forward. Corridors also includes space for drainage, soil stockpiles, haul roads etc. Land would be restored above the cable route, no permanent above ground infrastructure other than potential kiosks to allow access to cables for maintenance. Cable swathes/corridors – ESC has found through engagement in other projects, shared cable corridors possible, EA1N and EA2 had shared 70m corridor for both projects (32m cable corridor for each), pinch points came down to 27m if other sections of the corridor were slightly widened. Cable corridors as proposed in current consultation will hopefully be reduced.

**Tunstall Parish Council** – difficult to give a precise response in the absence of that detail in the consultation. If the project is being funded elsewhere, are people less likely to go along with it? It is worrying responding to a consultation with such high-level detail.

**ESC** – As the pre-application phase progresses developers should provide end-state visualisations, it is also helpful to have growth rate visualisations and more detail on reinstatement. This should be fed back into consultation response.

As for funding, previous concerns were raised regarding Sizewell C, we are limited in our feedback to material planning considerations so will not be commenting on this.

At this stage detail is high level and as consultation progresses, more and more work and detail will be provided.

**Dunwich Parish Meeting** – engaged with National Grid engineer at Leiston consultation event, learned about offshore energy islands as potential future alternative. Therese Coffey MP suggested Bradwell as a potential onshore connection. This consultation is desk-based, evident National Grid has not visited sites. Concern for landowners whose land would be needed for the project. Want ESC to talk to National Grid about alternatives. EuroLink is just one project – this could happen again and again to East Suffolk. Request for ESC support to put pressure on developers, not accepting fait accompli. Concern that if this does not happen, villages could be played off against each other.

**ESC** – We also spoke to the engineer who was an advocate of energy islands, he did however confirm that the UK Government were not yet on board with providing this type of infrastructure – therefore you would need a developer willing to provide that level of anticipatory investment for other developers to get on board. Other countries have been able to progress energy island approach due to the Government backing. UK government is not in that position. While it sounds like a potential great alternative, still need to bring the electricity onshore and locations will be favoured where there as a connection and capacity. ESC will continue to make the challenge to developers, but we have to assess and engage on what is proposed now. Whilst we ask for information about why energy islands are not an option at present, we still have to engage on the current proposals to influence the project at this stage. Detrimental if we do not engage now.

**Dunwich Parish Meeting** – real issue with lack of awareness, people are not aware of these projects. ESC needs to be louder about consultation, people do not know what is proposed and where.

**ESC** – we can feed that back to developers, highlighting not everyone is being reached. National Grid has put publications in papers, leafletted etc but open to ideas to feed back to developer to improve reach for next time.

ESC has been pushing government to do things differently for some time, through OTNR engagement. Early Opportunities workstream are in process now, ESC pushing to influence this. There is a concern and risk voiced that quick changes on projects will deter investors or jeopardise the nation's ambition for Net Zero. ESC also feeding into Pathway to 2030 and Enduring Regime. OTNR working to identify what can be done now in current legislative regime. Some changes passing through now, government did progress legislation on anticipatory investment for MPAs. ESC continues to feed into OTNR, all engagement published on ESC website.

**Southwold Ward Member:** we need to look at strategic issues now. We do not necessarily want the electricity here, we have Sizewell, the demand is in London. Why not take the proposals to London, or a brownfield site? Covering Suffolk countryside with substations and pylons is not good – better to take it with HVDC cables down to London with substations and converter stations on brownfield sites or offshore platforms. Lots of technical issues that we have already queried – why limit to 1.4G, why 100m trenches are needed, cable capacity restrictions. Strategic issue – 50GW offshore wind

needed to get to 2030 Net Zero goals and for energy security, need some way of getting it onshore. Offshore ring main potential solution. Could have a cable from Lowestoft connecting into offshore wind farms heading to London, alternative North Norfolk to Hull. Other governments are doing this – getting investment in place to move industry forward. All MPs seem to be against this idea, OFFSET group to oppose this, need to get them on side. Would like ESC to urge MPs (including Environment Secretary) to get a sensible plan for coordinated infrastructure in place.

**ESC** – You will see on ESC’s website; we have been pursuing government to influence developers’ plans. Some strategic elements are moving; initially Nautilus was proposed as a traditional interconnector and later became an MPI. We are somewhat governed by where National Grid Electricity System Operator’s grant connection offers. Obligations (financial, environmental) still important. OFFSET MPs requested for example the Norwich to Bramford East Anglia Green project go offshore, but on financial implications alone – an overhead line would cost approximately £800m onshore, £2-3bn approximately to go offshore. OFGEM will raise concern about cost for consumers, seeking lower costs for consumers to carry the cost on their bills. Constraints and frustrations are shared.

**Southwold Town Council** – has written to Leader of ESC explaining position and seeking response. Appreciate the meeting today to get parish and town council views. Whole process is uncoordinated, more a political issue than a planning issue, though planning issues are still important. Not sure how ESC can influence the government, particularly when Therese Coffey MP cannot get BEIS, EA, or National Grid to attend a meeting. What else can ESC do to get views of local parishes across? Agreed with other attendee’s point about need for more information in documentation. One hectare for incoming cable run, what does this mean? Is it permanent? How are cables going to be put through the countryside 30/40 miles to Friston through problem areas?

**ESC** – there is significant strength in being able to provide a planning-based response to challenge developer assumptions but need evidence to give weight in responses. We want to empower parishes in these events to discuss issues. Consultation is a great opportunity to provide developer direct feedback. ESC continues to push on OTNR. Will also feedback on consultation, if residents do not feel they are being appropriately notified, we can push back.

**ESC** – at landfall everything is buried underground, other than kiosks along cable corridor. Transition bays where offshore cables join onshore cables will be completely buried.

**Dunwich Parish Meeting** – Cables have already landed at Sizewell for offshore wind farms, why cannot cables be laid next to each other? Energy islands. If this is just the start of development this is alarming; idea of Suffolk becoming an energy hub for the whole country. This is the nation’s backyard, people come here to enjoy the countryside. Cable running through Dunwich would go through nature reserve, a beautiful area of land. Removal of trees for cable installation is a

permanent change to landscape, and years of ecological damage. Need a more intelligent approach than going through sensitive Dunwich cliffs, an area known for coastal erosion.

**ESC** – Galloper and Greater Gabbard cables land at Sizewell, existing cables form a constraint in addition to presence of nuclear power stations. Existing constraints at Sizewell limit capacity for further cabling.

There is the possibility of coordination through cable laying, so multiple cables laid within one corridor – important part of consultation is whether coordination of cables should be pursued. Whilst different developer cables can be laid alongside each other, a separation gap is required, more likely that a developer progressing two projects could site cables closer to each other than two separate developers.

**Walberswick Parish Council** – smart for ESC to do small groups first. Moving forward people will want broader and larger groups for engaging with parish councils. On investment matters – amount of money this government has promised to Sizewell C will dwarf anything that could be built in the North Sea. Lacking energy security strategy at national level. If ESC believe they have been neutral on Sizewell C and Friston – need to be incredibly clear at this point and say no. ESC should say no and force developers to rethink. If a district council says neutral (as was seen of ESC at hearings), then parish and town councils lose voice. Need ESC to fight corner.

**Walberswick Parish Council** – just because something is more expensive, does not mean it is wrong. How can loss of RSPB reserves and nature be valued? Natural environment is a priceless resource and needs to be factored into thinking.

**Southwold Town Council** – Dunwich cliffs and Eastern Barents are not good ideas. Should focus on benefits to ESC – if ESC is neutral, need to give a far better reason for being neutral and the benefits that will develop from project. Want clarity from ESC on position, want ESC to say no and resist.

**ESC** – thanked attendees, outlined next steps and closed meeting.

\*Meeting close\*

## **Meeting 2 - 11.00-12.00**

<b>Town/Parish Council</b>
Leiston Town Council
Middleton-cum-Fordley Parish Council
Theberton and Eastbridge Parish Council
Aldringham-cum-Thorpe Parish Council
Kelsale-cum-Carlton Parish Council
<b>Ward Members</b>
Councillor Tom Daly - Aldeburgh and Leiston
Councillor Russ Rainger – Aldeburgh and Leiston
<b>East Suffolk Council Attendees</b>
Councillor Craig Rivett – Deputy Leader and Cabinet Member for Economic Development
Philip Ridley – Head of Planning and Coastal Management
Naomi Goold – Energy Projects Manager
Beth Rance – Energy Projects Planner
Kimya Piper – Energy Projects Coordinator

### **Suggested Agenda Items:**

- Landfall
- Cable Routes
- Converter Station Options
- Grid Connection
- Coordination Opportunities
- General Comments

**ESC** – introduction and short presentation before opening up meeting for questions and comments.

**Middleton-cum-Fordley Parish Council** – what permanent structures will remain visible for landfall? Why is it only possible to bring one additional set of cables ashore at Sizewell? Why has it not been considered to coordinate with SPR for landfall?

**ESC** – all landfall infrastructure will be below ground. There is a need for a transition bay where offshore and onshore cables are joined but this will be buried and likely set back from the coast. Sizewell has constraints given existing cable infrastructure making landfall, also near the cooling towers for Sizewell B, and the coralline crag makes it further challenging. National Grid Electricity Transmission (NGET) does not consider there to be potential to come ashore at Sizewell with cables

for more than one project. ScottishPower Renewables (SPR) considered and chose not to come ashore at Sizewell.

**Middleton-cum-Fordley Parish Council** – if more than three additional connectors could be brought onshore in a single landfall on Aldeburgh-Thorpeness beach, does it not make more sense for SPR cables to locate there rather than through the cliffs?

**ESC** – Important to note the Aldeburgh landfall site also has constraints, it is located within part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and part of North Warren RSPB Reserve with The Haven, Local Nature Reserve to the south-east.

Fully understand the point on coordination being desirable, ESC has also advocated for this. The EA1N and EA2 projects have however been consented, it is not possible to easily make fundamental changes to the consented scheme, especially outside the Order Limits, such options will not have been assessed and are not part of the consented proposals. Any change to landfall/cable route on EA1N and EA2 like that suggested would be a material change to the project. In addition to the need for assessments and consent, the developer would need to secure land rights etc, it would involve a significant change to consented Order Limits and resultant issues of lack of consultation and engagement on the updated cable route. SPR would also need to support the change.

**Kelsale-cum-Carlton Parish Council** – why are we even looking at concentrating all projects in such a small stretch of coastline? Energy is needed in the south. Can the landfall options be located further south? Does ESC support the close concentrations of landfalls? Is ESC pushing government to consider alternatives on other sites – brownfield sites near Tilbury, Isle of Grain? Is it a foregone conclusion? No analysis in the consultation documents about alternatives. Frustrating to read consultation documents without this comparative work. Why is ESC not pushing national government to consider alternatives?

**ESC** – ESC is open about all consultation responses, publicly available on ESC website. On concentration of energy projects point, it does make sense at surface level to locate infrastructure near demand, but connection offers are provided by National Grid Electricity System Operator (NGESO) in a specific geographical area. ESC has been vocal and active about inspiring Offshore Transmission Network Review (OTNR) to recognise East Suffolk as bearing brunt of energy projects. Through the Early Opportunities workstream of the OTNR ESC pushing as hard as possible, the government does not want to jeopardise meeting Net Zero targets, there is little time to change legislation for projects already moving. ESC is also feeding into Pathway to 2030 and Enduring Regime workstreams of the OTNR. Introduction of Future Systems Operator is welcomed as their role is to provide a more structured, coordinated approach to national energy. Nautilus and EuroLink becoming MPIs from traditional interconnectors and potential option for connection at Isle of Grain for Nautilus are outcomes of OTNR. Major Issue is however the lack of government funding for alternative solutions.

**Kelsale-cum-Carlton Parish Council** – resistant of ESC accepting all the projects coming to East Suffolk. No joined up thinking, national government in disarray, issues of continuity at national government level. Concerned about East Suffolk coast being industrialised, not right.

**Theberton and Eastbridge Parish Council** – issue of coordination, understand point about need for long term strategic policy about landfall. Frustrating that there are three National Grid projects that are not seemingly communicating with each other. Leiston EuroLink public session – three landfall options are in marshes, crazy. Recent Sea Link Scoping Report – quite clear that coordination at Aldeburgh is the way forward according to the developer, but lacking coordination in practice. All projects are in proximity but not coordinating. Therese Coffey MP meeting – review of landing sites, only trouble with that is government reviews are incredibly slow and will not happen fast enough (if it does indeed happen) to affect these projects. 15 hectares of converter station if all projects do co-locate. Scoping Report – not even going out to difficult places like Saxmundham crossroads, not considering what happens when Sizewell C implements e.g. Sizewell Link Road. Not looking at options of actually getting transformers to site. Not grounded in reality.

**Leiston Town Council** – cumulative impact cannot be ignored, long-term demographic impact. Reliance on retirement sector, who runs voluntary sector. There'll be no community if you harm those demographics. Concern that Leiston is being surrounded by NSIPs, a ring of infrastructure. Concern about tourism and leisure – why would people want to live here/holiday here? Socioeconomic impact of multiple NSIPs. This project as a standalone project could be acceptable (limited permanent visual infrastructure) but in combination with the multiple other projects, that does not stand.

**Aldringham-cum-Thorpe Parish Council** – these consultations and Sea Link scoping report are premature – EA1N and EA2 Judicial Reviews not decided, Nautilus looking at alternative connection site at Isle of Grain and outcome yet unknown, lots of moving parts which will impact scoping for all projects. Clear interdependence between projects but they are all coming forward separately. Two further projects (Five Estuaries and North Falls) are also looking to coordinate with interconnectors, not much yet known but all projects are commencing at same timescale. Scoping Report was premature. NGET advised by Planning Inspectorate to wait until consultation period was over for Sea Link before submitting Scoping request, developer did not wait. Lack of communication at National Grid. ESC's agenda matters – difficult to answer questions about preferences/least-worst – huge burden on parish councils to read and discuss consultation. Just responding to the Scoping Report is a major task and has led to confusion among population. Consultation fatigue, incomprehensible.

**ESC** – ESC has ongoing dialogue with government through meetings/groups/panels. The piecemeal and incremental approach is a key concern which has continued to be raised.

Queried whether possible use of Planning Aid England by developer would assist parish and town councils.

**Leiston Town Council** – would welcome any support in terms of resourcing. Issue of these projects coming forward at the same time as Sizewell C, concern about cumulative impact on traffic, and particularly traffic using rural roads adding to existing burden of Sizewell C traffic.

**Ward Member** – difficult to develop and keep a grip of all the projects. Is there a role for ESC to look at social and environmental impact assessment to develop an evidence base, explicit data about environmental and social impact to use when engaging. At present, lots of concern/worry/fear that would be best supported by data.

**ESC** – cumulative impacts alongside other known projects will be addressed in Environmental Impact Assessment by developer. Nobody has done a cumulative assessment of the impacts of projects coming forward to East Suffolk Coast. Same is true of other localities – Essex, Norfolk. Government should be looking at this, but the system is far from perfect, system not designed in a way to have initial coordination conversations at outset, coordination generally retrofitted once projects are more solid. Mitigation also needs to be coordinated in terms of reducing impacts. ESC will continue to engage with OTNR, BEIS, central government as necessary.

**Kelsale-cum-Cartlton Parish Council** – Libby Purves article in East Anglian Daily Times about Therese Coffey MP meeting was highlighted. Did not find Planning Aid England resourcing very helpful, they do not do the work for you, they just assist with format of engagement, parishes still have to do a lot of work. Essex and Kent do not have plans for new nuclear power stations on their coast, East Suffolk is the target for all energy projects. East Suffolk faces particular challenges of multiple NSIPs.

**Middleton-cum-Fordley Parish Council** – if the landfall for up to three sets of cables is on the beach between Aldeburgh and Thorpeness, route heading west goes through wetlands (north Haven and North Warren nature reserves), Horizontal Directional Drilling (HDD) is mentioned in consultation documents for sensitive landscapes. Does ESC have view on technical feasibility in those locations?

**ESC** – we will need to consider the impacts very carefully and whether open trenching or HDD would be more/less impactful, it is a balance. The developer needs to investigate the feasibility of HDD fully. In addition to considering the marshes, need to look at engineering feasibility in shallow seas etc. HDD has its limits, understood limit is approximately 1.5km but some of that distance is taken up offshore, developer needs to work out how close to shore it is feasible for ships to come. Potential that developer would still need to come up in SSSI, alternatively would need to HDD beyond the former/disused railway line. We do not have in house technical specialism so would need to wait for feasibility and engineering studies from developer.

**Middleton-cum-Fordley Parish Council** – how wide would combined cable corridor be?

**ESC** – not explicitly said if HDD techniques are employed. In Sea Link Scoping Report coordinated corridor of 100m wide for HVAC cables but that is likely to increase when you HDD. Open trenching is far quicker, much narrower working width. SPR projects – open trenching preferred for speed through Special Protection Area (SPA). Scoping report contains a lot of information some of which may not be submitted into the consultation documents. EuroLink has not done the same level of assessment that Sea Link has yet.

**Middleton-cum-Fordley Parish Council** – difficult to engage when such little detail is known/shared.

**Theberton and Eastbridge Parish Council** – issue of where Nautilus stands. Only Sea Link has scoped. Do we know when Isle of Grain/siting preference will be known? HDD – conversation at Sea Link consultation in Friston – National Grid could HDD beyond railway line to come up. Disaster if HDD emerges in marshland. Concern about EuroLink coming up in the marsh.

**ESC** – no further information about Nautilus connection is known, would likely be wrapped up in decisions on Early Opportunities workstream under OTNR, that is personal view. Conclusions were expected before now on Early Opportunities, still expecting announcements end of this year/early next year about which developers are putting forward Pathfinder projects.

**Aldringham-cum-Thorpe Parish Council** – Saxmundham consultation event. At Hinkley, National Grid are coordinating their approach. Engineer at consultation event was keen on putting all three cables through landfall at Aldeburgh, by the golf course. Aldringham getting brunt of SPR. Hearing different things about who said what and when. National Grid webinars said Isle of Grain not desirable, no one wants to go to the site in Essex. Confusing about where to advise. Time is running out to meet Net Zero. Not time to even refute projects, will run out of time by 2030.

**Kelsale-cum-Calrton Parish Council** – Councillor Tom Daly's points on data is good, developers are light on detail, heavy on expediency. Would hope that ESC will push developers to think about best techniques (HDD/open trenching). Does ESC have the resources to deal with data and detail? Time push for 2030 is a factor but we cannot accept these projects as foregone conclusions, not rushed through to meet 2030 targets. Request for contact information for government. SEAS is doing good work. Cannot just accept what developers have to say.

**ESC** – main contact is BEIS on strategic matters and OTNR. Need to comment on individual proposals via the developers but have regard to wider strategic proposals.

Recognise need for as much detail as possible whilst also need to understand stage of the process, we have regularly pushed point to developers in consultation responses that further information is

required at an earlier stage. ESC pushed back on cable trenching plans for EA1N and EA2 on sequential cable trenching, ESC pushed for concurrent trenching or at least the first project ducting for the second.

**Leiston Town Council** – impression at Public Information Days (PID), very much desk-based exhibition, very little to be learned other than what was on the consultation boards. Impression that National Grid could drill under marsh and railway line, seems they were speaking different things to different people. No confidence in developer understanding of the sites or their individual contexts. Converter station – landfall sites returned to how they are now after reinstatement (though sceptical), converter station needs infrastructure around it to build it, concern about loss of trees and landscape impact. Concerned about permanent damage further inland, cumulative impact of converter stations. Infrastructure – concerns about rural roads. Do converter stations give ESC equal concern as landfall site? Is the landfall site the primary focus?

**ESC** – focus is on whole onshore project all aspects are considered from the landfall to the converter stations and substations, every element. This will include looking carefully at cumulative impact, potential mitigation, and compensation. ESC has challenged developer previously e.g., SPR on suggested growth rates for mitigation planting and did secure positive changes. Need to look at impacts holistically.

**Leiston Town Council** – was told at a PID that formal consultation would likely be this time next year. Need to apply pressure now, more information needed about preferred infrastructure around converter stations, compounds, connecting roads.

**Middleton-cum-Fordley Parish Council** – EuroLink bringing Netherlands electricity, may be generated from non Net Zero carbon sources. EuroLink is about flexibility in the system and not decarbonisation. Converter station sites east of Saxmundham, one of most ludicrous proposals, cables would need to track westwards to the site and then double back towards Friston. Would they use same trenching for HVAC cable? Or is it a new cable corridor on HVAC link?

**ESC** – couldn't go through exactly the same piece of land which would have HVDC cables in, so whilst ESC can try and get the swathe as narrow as possible and cables as close as possible, would not be the same ducting. Unlikely to be in the same 40m corridor, cables need spacing between them. HVAC cables have more trenches.

**ESC** – thanked attendees, outlined next steps and closed meeting.

\*Meeting close\*

### **Meeting 3 - 13:30-14:30**

<b>Parish/Town Councils</b>
Friston Parish Council
Aldeburgh Town Council
Snape Parish Council
Sudbourne Parish Council
<b>Ward Members</b>
Councillor Tom Daly - Aldeburgh & Leiston
<b>ESC Attendees</b>
Councillor Craig Rivett – Deputy Leader and Cabinet Member for Economic Development
Nick Khan - Strategic Director, Strategic Management
Philip Ridley – Head of Planning and Coastal Management
Naomi Goold – Energy Projects Manager
Beth Rance – Energy Projects Planner
Kimya Piper – Energy Projects Coordinator

#### **Suggested Agenda Items:**

- Landfall
- Cable Routes
- Converter Station Options
- Grid Connection
- Coordination Opportunities
- General Comments – Consultation, Organisation

**ESC** – introduction and short presentation before opening up meeting for questions and comments.

**Aldeburgh Town Council** – considering Full Council has been held in person for months now, why is this event being held remotely? And why are parishes being split geographically? A lot of views are coordinated between parishes. Parishes did not want to be separated.

**ESC** – organised meetings to seek best engagement with smaller groups, benefit of virtual engagement in small groups is everyone gets a voice. Convenience of joining remotely. Intention is to share notes of meetings with all attendees.

**Aldeburgh Town Council** – request for notes to be shared. Developers are not talking about proper coordination, rather co-location. Coordination – would expect to see a loss of impact. Doing all three projects at the same time may result in lower impacts, impacts in a shorter period of time rather

than sequentially. Developers have shared that they would do more in terms of coordination, but BEIS is not pushing for it. What is ESC doing now to influence the national picture to push for more coordinated solutions? Commitment to larger sums of money for the projects, more difficult to change plans (towards coordination/co-location) once that has happened.

**ESC** – at the moment acknowledge that National Grid is primarily looking at co-location of converter sites and we have requested full coordination, this has also been voiced through the Offshore Transmission Network Review (OTNR) and Early Opportunities workstream. We have also written to National Grid to request it, and have pushed it with developers, we are tackling this at every level. Coordination needs to start with pre-application phase and engagement, looking at how consultation is undertaken, there is a need to reduce the burden on communities, need to also consider burden on communities at Examination phase, looking at how projects coordinate (co-location, corridor sharing and so on), as well as at the post-consent stage in terms of delivery of projects. Those requests have been made. Developers have put markers in the sand in their consultations to say they are looking at coordination, ESC continues to push hard for coordination at all levels.

ESC would welcome seeing confirmation in writing that BEIS are not pushing developers to coordinate, we can then use in our discussions. All ESC responses are publicly available on ESC website. OTNR – ESC has been pushing coordination point and concern about cumulative effects of projects in East Suffolk. ESC pushing for tangibles from OTNR regarding community impact. ESC continues to push with BEIS, would welcome any evidence from towns/parishes to use in those discussions.

**Snape Parish Council** – importance of coordination throughout the process. Cumulative effects of the projects themselves and the impact on communities/individuals in the area as a steady tidal wave of projects comes in, all of which need engaging with and responding to. Burden of continued engagement, unending wave. Professionals do not always understand the impact this has on communities, disturbance and worry in communities, concern about the future. Mental health and wellbeing issue, as well as a technical issue.

**ESC** – developers working on same timescale for consultation, helpful to understand how communities feel about that organisation and whether it would have been better to have joint Public Information days (PIDs)/engagements events?

**Snape Parish Council** – splitting of projects difficult when both projects are led by the same developers. Repeated reassurance from National Grid that there will be proper consultation in Snape but this engagement has not yet happened. Projects will have a direct impact on communities in Snape but there has been no targeted engagement to date. Doubles concern and uncertainty in communities.

**Sudborne Parish Council** – thanks on responsiveness in organising meeting. Slight misunderstanding in terms of impact of projects on parishes just to the south of the targeted parishes. There will be significant impact on traffic for communities heading north. Have engaged with EuroLink to say no engagement from National Grid thus far, have asked for leaflets to distribute but none have been received – request made at Leiston information day through Grayling PR. Creates frustration in community. In EuroLink consultation, extensive engagement with engineers at PID – offshore energy islands are deliverable and would make a huge difference in how all of the projects are delivered and what the community and environmental impacts would be. Germans and Belgians are progressing their proposals for energy islands, in recognition of lesser impacts on communities of onshore infrastructure. Consultation process for EuroLink is only therefore half a conversation – unless you had engaged with an engineer at a PID, you would not know there are alternatives. Engineer was clear that communities pushing for offshore platforms and energy islands could have an impact on National Grid board. Why should we accept onshore disruption when there are offshore alternatives? Engineer also said it is possible to have multiple projects on an energy island, makes life simpler (although still technically difficult). Would encourage SCC and ESC to push BEIS to look at energy island option seriously. BEIS appears to be waiting for National Grid to come up with the idea, National Grid seem to be waiting to be told what to do by BEIS. Need for strategic and assertive influencing on offshore alternatives to greatly reduce impact on local communities. Grid connections – how the converter stations can be co-located to reduce the impact on local communities and protected landscapes, has to be done. Still astonished that National Grid is operating in such a fragmented way under the National Grid umbrella. Evident that focus is on Aldeburgh from discussions with developer at PIDs. ESC need to influence BEIS and National Grid (and other developers) about what they should be doing to alleviate impact on local communities.

Would welcome ESC support in request for additional information, engagement, and leaflets from developer. Issue of low levels of awareness. Erosion of perceptions and experience of Suffolk as heritage coast, valuable tourism industry.

**ESC** – potential ‘merry go round’ of offloading obligations about what is possible, National Grid pushing to OFGEM/BEIS and so on. Further complications with National Grid having three separate companies within one entity. In terms of alternatives there was a report considering alternatives to East Anglia GREEN – squaring comments from engineers at PIDs compared to offshore alternatives; most notably cost implications for consumers are enormous. Whether these costs need to be further challenged/tested is up for debate. Onshore connections around £800m, offshore at £2-3bn. Enormous sums involved in all energy projects, worthy of government to give consideration.

**Sudbourne Parish Council** – depends on how impacts are quantified, impact on the environment, communities, long term resilience etc. Figures should not be accepted at face value. OFGEM will

look to whatever is cheapest for delivery of power to the grid, but the calculation can be made in a number of ways and a pure cash valuation cannot be accepted.

**ESC** – during conversations with National Grid, we have been told Sea Link was in part needed to ensure robustness in the grid in the event of a fault. If there is a fault this end power can still go to Kent, therefore bypasses the issue and the same would be true for the Kent end. We appreciate however the consultation material does not make that point clearly, it instead focuses on capacity. We will be picking these questions up.

**Friston Parish Council** – What is ESC’s position on these projects? Reason National Grid are coming here for these projects is that they brought in a connection hub as part of SPR projects. Without that connection hub at Friston, these projects would not have come forward here. ESC did not oppose the SPR projects, those of us who work closely with the projects know that ESC facilitated the consenting of those projects. What is ESC’s position at the moment? Have read ESC’s response on Sea Link scoping. When will this position be discussed, where the public can attend? The Sea Link Scoping Report was an appalling piece of work, ESC did a good job going through it. Massive waste of time. A sloppy piece of work and disrespectful, showing huge arrogance, which is not acceptable. ESC should be more robust in language about how poor the piece of work was. OTNR – understanding is the only Early Opportunities being considered is North Falls and Five Estuaries connecting into interconnectors, not sure if any other projects are being looked at. Detail point – with the necessity for Sea Link there is an obvious point that this is being built to take power from Suffolk to Kent. Why don’t the SPR projects connect directly to Kent? We have been told power needs to come from Suffolk to Kent, do not see why Suffolk needs to be a mid-point. Suffolk has baseload from Sizewell.

**ESC** – ESC needs to consider what is in front of us, which is a challenge, we wanted the communities to be able to see the PIDs before we write our response. Response for these consultations will be done through delegated powers to Head of Planning and Coastal Management in consultation with Cllr Rivett, as per previous responses. ESC response will be publicly available on ESC website. Engagement with SPR was not facilitative, accept however that we will need to agree to disagree on this point. ESC is cognisant of extent of influence.

On the connection to Suffolk-Kent question, when ESC asked what the need for it was, we were told in the event there is a fault at the Kent end, they would need to move power elsewhere, so that is one reason. Otherwise, at times when there is less offshore wind being produced in this locality and Suffolk is potentially importing more electricity through the interconnector, then power can be imported into Suffolk. Difference in this discussion with what has been put in the consultation documents. Further clarification on this point is needed.

There is a letter from North Falls, Five Estuaries, NGET, and NGV saying they will look at becoming a Pathfinder project and look to coordinate. Informal view that if North Falls and Five Estuaries are looking for coordination, they could only coordinate with each other and potentially link up with an interconnector. NGET and NGV are then left and there is a question of how they could coordinate. ESC has pushed hard – if these projects do come here, they need to demonstrate how they have coordinated across the board. ESC has stated this clearly in OTNR engagement – not just co-location, need more sincere coordination.

**Friston Parish Council** - Is the council going to reach a formal position on the project? When is a position of support or objection be made?

**ESC** – formal response comes at point of Development Consent Order submission as has been done on other projects. If/when we get a DCO submission, a report will be taken to Cabinet to get appropriate delegations in place and confirm a political position on the projects at this formal stage. This is an early non-statutory consultation and so formal internal processes to get a formal position on the project which will be taken forward to examination will not be done for this consultation.

**Friston Parish Council** – parishes have been divided, invidious to ask parishes to comment on what should be located in each parish. The broad view among all parishes is opposition. Quality of Scoping Report was poor and questions raised about robustness of approach from ESC, does not reflect lots of issues which were explored in depth in the SPR Examinations. Waste of time in reinventing the wheel. Will ESC be more robust in future engagement on the project?

**ESC** – Scoping Report is a technical exercise in informing Environmental Impact Assessment and Environment Statement process. ESC has responded on scoping, and Planning Inspectorate will consider this alongside all other responses in due course and will hopefully pick up on those concerns.

**Friston Parish Council** – as local planning authority, ESC has the most influential voice in the DCO process. From a parish council perspective, it would be helpful if ESC could be more robust on poor quality of scoping. Planning Inspectorate should understand the mood music around engagement beyond the technical matters of scoping.

Kent to Suffolk matter – if it was just offshore wind providing electricity to Suffolk, concerns about low wind power generation would be one thing, but we have Sizewell to provide a baseline. If the EA1N and EA2 Judicial Review is successful, why cannot the wind farms connect directly to Kent? A challenge from the local planning authority is much more influential than a challenge from anyone else.

**ESC** – not intention to divide the parishes, format was determined to encourage the most meaningful discussion in smaller groups. Far better opportunities to engage in smaller sessions. Notes from all meetings will be shared.

On the need for Sea Link, ESC will pick this up moving forward. We need to seek the provision of a clear justification.

**Ward Member** – on Kent to Suffolk element. Speaking to Sea Link at PID, was told this is part of strategic view looking forwards that Sea Link does not need to come into Suffolk, is more about looking at power network going into future, power going not just to Suffolk, but north and north-west, power going to and from Europe. Wider view of power flows. If you do not need to reinforce Suffolk, and the other interconnectors do not come into Suffolk, was told future power movements may still necessitate the need for the projects in Suffolk.

**ESC** – Holistic Network Design as part of OTNR looks at matter of strategic growth/future direction.

**Snape Parish Council** – increasingly aware, as wider awareness grows, is a realisation among the public across East Suffolk that these projects represent a complete change in character of the area. Growing realisation that if any multiple of these projects happen, the character of East Suffolk and in particular the middle part of it, will permanently change. We all need to think about this, not just a small part of the district, rather than impact on the whole district and wider county. As local planning authority, ESC is not determiner of planning application, but this should still be considered under Local Plans and other planning policy.

**ESC** – we are feeding into both NSIP projects within and adjoining East Suffolk's boundaries e.g. East Anglia Green, Bramford to Twinstead etc, we have said and reiterated the importance of a strategic approach to coordination as best we can.

**Aldeburgh Town Council** – at Kent, Sea Link is not going to a substation, rather landfall to a converter station and then into the network directly. Gives weight to argument that Kent cannot provide power back to Suffolk. Looking for ESC to separate any myths around benefit to East Suffolk (e.g., jobs for Lowestoft) from business rates, East Suffolk does not need this economy. No benefit at all for Suffolk for hosting these projects – no issues of unemployment. Regardless of stage of consultation currently being non-statutory, parishes should not be the ones to put the work in now, cannot wait until formal consultation to make clear position. ESC should be more assertive now at an early stage unlike what was done for Friston, cannot wait until the next round of consultation to take a stance. If ESC is going to accept the wind energy coming in here, we cannot also have Sizewell, as we will not need it. Crucial timing right now to engage. Engagement at PIDs – 6 or 7 major questions that have been raised with BEIS that they cannot get the answers for, and they need the answers before they can look at other sites/brownfield sites.

**Sudbourne Parish Council** – can take analogy of offshoring production when we as an economy went offshore to China (cheaper, lower environmental standards), fear is that the energy companies which are either owned by French government or largely venture capitalists, will pick on Suffolk because they see it as an easy win, compared to anywhere else. Concern that ESC will become industrial hub, precedent once one project is here. Valuable environment would be impacted if projects progress as they are proposed now. Important for ESC to protect interests of communities here.

**ESC** – Disagree that any developer will say that they get an easy ride here, they are driven by connection offers.

Additional notes from the chat - Aldeburgh Town Council - The public attending were still confused, and those staffing the stands didn't know about other projects. So, public had to attend two and be very specific/knowledgeable about the issues. The information stands also did not include environmental constraints, the AONB was only shown on one panel/set of maps.

**ESC** – thanked attendees, outlined next steps and closed meeting.

\*Close of meeting\*