



Freepost SEA LINK

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Our ref: Sea Link Non-stat Res

Date: 18 December 2022

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Dear Louise Lewin,

Response of East Suffolk Council to National Grid Electricity Transmission Non-statutory Consultation on the Sea Link Project

East Suffolk Council (ESC) welcomes the opportunity to provide comments on the initial proposals for the Sea Link project. 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.

During the consultation ESC held a series of meetings with the directly affected town and parish councils to seek their views on the project. 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.

Need Case

Whilst it is recognised in simple terms that the requirement for the project was established by National Grid Electricity System Operator (NGESO) within the Network Options Assessment (NOA) and National Grid Electricity Transmission (NGET) are now seeking to deliver the reinforcements identified, further explanation is required in relation to clarifying the detailed need case for the Sea Link project.

Information became known during the consultation that the need case for the project is more complex and multi-faceted than had been previously understood. ESC understands the need stems from not just the local requirements but a combination of local, regional, and national drivers across the network in terms of generation. Further, in addition to the need for additional capacity there is also a requirement to provide redundancy within the system to comply with the National

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

Electricity Transmission Security and Quality of Supply Standards (SQSS). ESC considers the full extent of the wider need case has not been clearly articulated.

During the meetings with town and parish councils, the need case for the project was raised and it was clear that different stakeholders held different understandings in relation to the reasons behind the need for the project and why it was required to be in Suffolk and specifically at Sizewell. It was clear that there is a perception that the project only deals with the local loads from offshore and onshore generation, which is a message communicated through the consultation material.

At present it is not considered that the need case for the project has been clearly communicated in published material and therefore greater clarity in relation to this matter is required.

There is also a void in relation to the information available on the alternative to the project. ESC understands that in the absence of Sea Link as currently proposed, the alternative to the proposals would be greater onshore infrastructure in the form of overhead pylons in between Sizewell and Bramford. ESC requests that NGET provides further clarification and communication regarding the alternative options for this project and confirms whether this is the case.

ESC requires the publication by NGET of a clear and concise explanation of the need case for the project in addition to clarification in relation to the alternatives.

Offshore Transmission Network Review and Coordination

The Council has been engaging with the Government regarding the unstructured and non-collaborative approach to energy development. ESC would like to be supportive of well-developed coordinated projects that enable the goal of Net Zero and the interim targets. This however cannot be at the expense of Suffolk's environment and communities. The succession of individual proposals impacting our communities without visible strategic oversight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation. 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 always 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 on from the Government since 2018¹.

It is noted that NGET is working together with other developers to explore the potential for offshore coordination with Sea Link as part of the OTNR Early Opportunities workstream. The joint

¹ [Strategic engagement » East Suffolk Council](#)

statement written by NGET, National Grid Ventures (NGV), North Falls, and Five Estuaries is noted². Whilst it is understood and welcomed that NGET is working with other developers including NGV to deliver greater offshore coordination, there have not been any tangible outcomes from this process. At present, whilst ESC supports NGET's commitment to this review, the Sea Link project alongside other energy projects proposed in this locality, are continuing to progress with no visible signs of offshore coordination. ESC requests details of the options being explored by NGET in relation to the OTNR and offshore coordination and an explanation as to how this would affect the current proposals.

In addition to understanding the offshore coordination being considered, should this project go ahead, ESC requires the project to deliver onshore coordination alongside NGV's Nautilus and EuroLink projects (should they also proceed). The delay to the start of the non-statutory consultation to look at opportunities for coordination was important. ESC acknowledges the work undertaken to date to look at siting and routeing options which could accommodate up to three projects. It is however evident that project alone options are still being explored and pursued by both NGET and NGV and limited information has been provided on the coordinated opportunities beyond that of co-location.

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. ESC requests that coordination is sought through all phases of the development including spatially and temporally.

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 project consecutively. The consenting of 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 only intensifies this need.

The consultation material states that NGET are working with NGV 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 work. Although the two options for converter station sites are also included within the EuroLink consultation, NGV are considering a further two additional converter station site options. Whilst NGET is considering two landfall options, only one of those is replicated in the EuroLink consultation, with a further three different landfall options identified

² [Joint statement from North Falls, Five Estuaries and National Grid: Commitment to exploring coordinated network designs in East Anglia - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/joint-statement-from-north-falls-five-estuaries-and-national-grid-commitment-to-exploring-coordinated-network-designs-in-east-anglia)

by NGV. The cable route options similarly identify different corridors and swathes. In addition, there are also significant differences between the siting and routing options proposed by NGV for Nautilus in their consultation last year compared to Sea Link. Whilst timing plays a part, there remains a clear lack of onshore coordination between the projects.

At present ESC seeks further information regarding the opportunities for offshore coordination being explored and considers that proposals do not currently reflect a coordinated onshore approach which is a significant concern.

Timing and Format of the Consultation

The timing of the consultation has been particularly difficult for ESC, other stakeholders, and local communities by virtue of its overlap with the submission to the Planning Inspectorate of the project's Scoping Report. Whilst the provision of an eight-week period for comments on the current non-statutory consultation is welcomed, the simultaneous need to provide comments on the Scoping Report within a tight timeframe has been challenging. ESC would have preferred for the non-statutory consultation and submission of the Scoping Report to be separated. A significant volume of information has been published for both the non-statutory consultation and the Scoping Report, which ESC understands has been particularly difficult for local communities to resource too.

The challenge of responding to this consultation is compounded by the simultaneously holding of a non-statutory consultation on the EuroLink project. Whilst the reasoning for the alignment of the consultations is understood, this still presented a significant challenge for the local communities to resource. The holding of concurrent consultations has also caused 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 in-person events and webinars 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 Sea Link project with the EuroLink 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 Sea Link and EuroLink, 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 it predominantly 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). The hearings in relation to the Judicial Review were held on 15 and 16 November 2022. This would have created resourcing issues for some parties but has also increased the uncertainty surrounding the adequacy of the site selection process for project which is based on a connection at the proposed Friston substation consented under the offshore wind projects subject of the 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 NGET's engagement plan in addition to the pre-election purdah period. The formal consultation should be held in June at the earliest.

Site Selection

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, NGET 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 this, ESC has provided detailed comments regarding the site selection process and the siting and routeing options within Appendix A. The Council has highlighted some additional matters which should be considered as part of the siting and routeing process. ESC also requests that prior to any decisions being made, site visits are undertaken to view all the options considered and understand their wider context. The high-level nature of the information provided has limited the Council's ability to provide detailed comments and identify site preferences.

Whilst no specific site option recommendations have been made, ESC considers that should the Sea Link project proceed alongside the EuroLink and Nautilus projects, without prejudice to the Council's position on the future applications, only siting and routeing options which facilitate the ability to deliver a coordinated solution should be pursued. At present both coordinated and uncoordinated options are being explored and this is of significant concern. Having said this, ESC considers that neither of the preferred sites are deliverable without significant challenge.

Summary

As a matter of urgency, ESC requires NGET to provide further clarification in relation to the multi-faceted need for the Sea Link project and provide explanation of the alternative options. It is important that the need case for the project is clearly articulated to allow all stakeholders to have clarity on this matter.

ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link, EuroLink and Nautilus projects³ at all stages of the development consent process. It is also imperative given the pressures this area of east Suffolk is facing, that in-combination effects with other proposed and consented projects are considered and opportunities for coordination maximised. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.

Whilst ESC recognises the work which NGET has undertaken to date to explore coordination; this remains insufficient. At present it is not clear what coordination is being progressed under the OTNR, and whilst this has been considered for the onshore siting and routeing options, both NGET and NGV are continuing to explore uncoordinated project alone options. In any case, consideration needs to extend beyond just that of co-location to ensure that genuine coordination at all stages of the process is secured. ESC would not support an uncoordinated approach to the Sea Link project.

ESC would welcome communication in relation to the formal round of consultation on the Sea Link 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, should NGET and NGV progress projects in east Suffolk, we would welcome having a multi-party discussion with the Planning Inspectorate at an early stage regarding how the consenting process could be managed.

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.

³ [13-SCC-and-ESC-Coordination-of-Interconnectors-letter-to-National-Grid.pdf \(eastsoffolk.gov.uk\)](#)

Yours sincerely,

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

Philip Ridley BSc (Hons) RTPI
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 - Sea Link Corridor and Preliminary Routeing and Siting Study (CPRSS)

- 1.1. Paragraph 5.1.11 of the Corridor and Preliminary Routeing and Siting Study (CPRSS) states that the appraisal process has comprised a combination of a desk-based collation of data for each sub-topic in addition to an appraisal of the potential effects of each option. It is disappointing that the site selection process to date has not included any site visits, ESC requests that prior to any decisions being undertaken on the siting and routeing options, that site visits are undertaken to view the options identified which will provide vital information about the sites themselves but also their context.
- 1.2. On many occasions within the CPRSS cost has been identified as a determining factor. Although ESC understands that this is a key consideration for NGET, it must not be the overriding consideration given the sensitivity of the onshore environment within the proposed search area. Decisions need to be made in relation to the project to seek to deliver the optimum outcome and not just the most cost effective. This need is only intensified by the numerous NSIPs which are proposed, consented, and currently being constructed within east Suffolk but specifically within the same concentrated geographical area as the Sea Link project is proposed.
- 1.3. Paragraph 3.1.7 states that a working width of 40m has been assumed for High Voltage Direct Current (HVDC) cables and 100m for High Voltage Alternating Current (HVAC) cables. Further information is required to justify the use of these parameters. For example, ScottishPower Renewables (SPR) has a consented a HVAC cable corridor width of 32m, with the exceptions of a few specific locations. It is assumed these widths relate to one project alone, if this is the case further information needs to also be provided as to the width of a shared coordinated cable corridor.
- 1.4. Paragraph 5.2.24 of the CPRSS identifies the parameters of the converter station which are stated to be either a 6-hectare site with building footprint of 200mx300m and a building height of 30m or a 10-hectare site with a footprint of 320mx320m and building height of 30m. Further information is required in relation to the two different converter station parameters with an explanation as to what circumstances each version would be promoted. Further confusion is created by the diagram provided of the converter station identifying the footprint as 250m by 250m. Clarification on these parameters is required. As stated above, it is important that the overriding consideration is not just cost.
- 1.5. The consultation material proposes to erect an extension to the proposed Friston substation should the infrastructure be brought forward under the SPR offshore wind consents. The

Scoping Report however included reference to the fact that should the substation not come forward, NGET will need to propose a new substation. Further clarification is required in relation to this matter and the parameters of the substations which would be needed.

- 1.6. Table 6-1 identifies constraints considered within the Environmental and Socio-economic Appraisal undertaken. ESC has provided some comments on the constraints considered below.
- 1.7. *Landscape and visual* – It is assumed that consideration of the Area of Outstanding Natural Beauty (AONB) includes the setting of the AONB as well as consideration of the effect of development proposed within the designation. Whilst national designations have been taken into consideration, localised landscape character assessments have not. In relation to landscape character the Suffolk County Landscape Character Assessment⁴ is important, in addition to the district level assessment⁵ and AONB Touching the Tide assessments⁶ which should be key informative guides. Consideration should also be given to valued landscape features. Box 5.1 of Guidelines for Landscape and Visual Impact Assessment 3rd edition offers a comprehensive range of factors that can help in the identification of valued landscapes and ESC would expect this guidance to be followed.
- 1.8. There is no indication that Tree Preservation Orders have been considered at this stage and they should have been. The potential impacts on all trees and hedgerows should be part of the consideration going forwards. ESC would expect hedgerows to be considered under the qualifying criteria included in the 1997 Hedgerow Regulations.
- 1.9. The historic character features of the landscape at a potential converter station site may make a significant contribution to the local character of place and the sensitivity of a site. The nature of this interest will need to be understood and assessed as part of both the site selection process and subsequent stages of assessment.
- 1.10. *Historic environment* – The constraints taken into consideration are noted.
- 1.11. *Biological environment* – The overarching ecological principle which must be followed in this options appraisal 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 appraisal 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.

⁴ [Suffolk Landscapes - Countryside Environment Service](#)

⁵ [Suffolk Coastal - Landscape Character Assessment](#)

⁶ [Touching the Tide - Landscape Character Assessment](#)

- 1.12. Please note that in Suffolk Local Wildlife Sites (LWS) are known as County Wildlife Sites (CWS).
- 1.13. *Physical environment* – It is welcomed that flood zones have been identified as a constraint, but ESC considers that this should be widened to relate to flood risk more generally. It is important to consider all forms of flooding which should include consideration of surface water flooding.
- 1.14. *Coastal protection* – The terrestrial siting criteria does not include reference to coastal erosion risk, coastal change or coastal management which is a significant concern. These are vitally important considerations which should be taken into account at the optioneering stage.
- 1.15. *Socio-economics* – It is welcomed that settlements have been identified, it is however considered that proximity to residential properties should have been considered as a constraint as well. Sea Link has the potential to cause significant effects on residential amenity both during construction and operation and this should be part of the site selection criteria.
- 1.16. *Traffic and access* – this matter has been included within the list of constraints but earlier in the CPRSS (paragraph 3.1.3) it is stated that the options appraisal did not consider temporary construction accesses. Further clarity is required in relation to what was considered within this constraint.
- 1.17. *Public Rights of Ways (PRoW)* – the PRoWs network has not been identified within the constraints list which is a significant omission which should be addressed.
- 1.18. *Noise and vibration* – there are no specific references within the criteria which identifies that noise and vibration has been considered at this early stage. Noise should be a key factor 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.
- 1.19. 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.

- 1.20. 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.
- 1.21. 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 involve 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.

- 1.22. 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. NGET 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.
- 1.23. 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).

- 1.24. As it is unknown as to 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 like 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.
- 1.25. *Light pollution* - It is unknown as to 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 in terms of 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.
- 1.26. *Private Water Supplies* - There has been no specific consideration in site selection on the impact on Private Water Supplies at any of the sites or during construction, this will need to be considered going forward.
- 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 to cover the eventuality that unexpected contamination is encountered and appropriately addressed.
- 1.28. *Air Quality* – It does not appear that the impacts of during construction works on air quality have been considered during site selection. It is important that air quality impact and dust control is considered early 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 upon 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 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. *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.
- 1.34. 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.
- 1.35. ESC request that further consideration is given to these additional matters prior to any decision being made on site selection.

2. Siting and Routeing Options

- 2.1. Notwithstanding the comments above in relation to the site selection criteria which has led to the selection of the siting routeing options presented, ESC has provided some more detailed comments on the options proposed. The comments have been confined to the emerging preferences presented within the CPRSS.

Site 1 Emerging Preference

- 2.2. The landfall option for Site 1 Emerging Preference 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.
- 2.3. In addition to the designated landscape, the landfall area of search critically includes sites designated for their nature conservation value which is acknowledged by paragraph 5.2.8. The site is located within part of the Leiston-Aldeburgh Site of Special Scientific Interest (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.

- 2.4. It is noted that there is a commitment to use trenchless techniques at landfalls to minimise impacts on coastal habitats “where feasible”. However, it is unclear whether landfall options where trenchless techniques are not feasible will automatically be removed from consideration. Clarification on this point is necessary in addition to the provision of further detail in relation to the engineering feasibility of trenchless techniques.
- 2.5. The impacts on residential properties and commercial enterprises must also be taken fully into consideration. The western end of the landfall and cabling corridor are in close proximity to residential and commercial premises. 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.
- 2.6. The impact of the works at the landfall on nearby designated heritage assets must be considered and understood.
- 2.7. 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 near ESC’s Coastal Change Management Area, it is welcomed that the consultation acknowledges this. A map of the area can be found within the Suffolk Coastal Local Plan.
- 2.8. Flood risk is also a significant concern. The low lying Hundred River valley has the potential for surface water and tidal inundation and lies within Flood Zone 3. Flood risk from all sources of flooding must be very carefully considered.
- 2.9. 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. 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, several 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
- 2.10. The approach taken by SPR to the coastal change assessment is considered to be an example of good practise that should the project proceed, ESC would request this is replicated.

- 2.11. It is noted that the Aldeburgh landfall site is the only landfall option which has also been included within the siting and routeing options for the EuroLink project and therefore at present would be the only option which would currently provide opportunities for coordination between the projects. This however needs to be balanced against the highly sensitive nature of the site and the impacts of the works. Significant further detail is required in relation to the impacts of the works at the landfall from both one project alone and cumulatively, in addition to the provision of required mitigation. ESC supports coordination in the right location.
- 2.12. ESC would like NGET 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). The Council would want to see detail about monitoring and mitigation of any construction, operational or decommissioning induced coastal change, and coastal access.
- 2.13. The cable corridor associated with the Aldeburgh landfall is heavily constrained on the eastern end by ecological and landscape designations in addition to other matters as previously highlighted. If this can be navigated, ESC agrees with the CPRSS that there is then a significant pinch point at the crossing of Leiston Road close to Aldeburgh Golf Club. At this narrow point the construction works would not only be near 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 from Leiston. The corridor also remains within the designated AONB for the majority of its length.
- 2.14. The preferred route of the cable corridor identified on the drawings then runs to the north of the current golf club layout but through an area of potential expansion for the business before continuing west to Site 1.
- 2.15. ESC requests that NGET seek a route through this area which seeks to minimise disruption to both residential properties and businesses. Should multiple projects be required to cable through this area, coordination both spatially and temporally will be essential.
- 2.16. Site 1 for the converter station comprises gently rolling countryside with a regular pattern of field boundaries, woodlands and coverts which are features typical of the Estate Sandlands⁷ 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 to the east almost bordering

⁷ [Estate sandlands - Suffolk Landscapes](#)

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.

- 2.17. 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.
- 2.18. Billeaford Hall (Grade II) is near Converter Site 1. 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.
- 2.19. 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.
- 2.20. 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.
- 2.21. 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.
- 2.22. It is understood that both the converter station sites (1 and 3) could accommodate up to three converter stations which would enable the potential for the co-location of infrastructure. Further information is required in relation to the cumulative parameters of the collective development and the extent of the infrastructure sharing which would be possible.
- 2.23. 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 Sea Link project alone, and in a coordinated scenario.

- 2.24. A 3.3km HVAC cable corridor is then proposed between Site 1 and the proposed Friston substation. It is proposed the cabling will enter the Friston site from the north which involves running near residential properties and holiday businesses. The route would involve interaction with the East Anglia One North and East Anglia Two Order Limits and cable corridors which are entering the Friston site from the south. The construction works in combination with the offshore wind projects will need to be carefully considered. The HVAC cable is stated to be up to 100m wide, justification for this is required.
- 2.25. ESC cannot provide more detailed comments or express a site preference without further detailed information in relation to the impacts of the proposed development.

Site 1 Alternative

- 2.26. Site 1 Alternative proposes a landfall at Sizewell, the HVDC cable corridor the travels across to Site 1, after which the HVAC cable corridor travels to the proposed Friston substation. The differences between this option and the Site 1 Emerging Preference are the landfall location and the HVDC cable corridor. ESC has therefore confined its comments to these areas, the comments on the HVAC cable corridor and Site 1 converter site will be the same as that of provided for the Site 1 Emerging Preference.
- 2.27. The landfall identified for this option is at Sizewell. A key constraint for landfall sites between Thorpeness and Sizewell is the Coraline Crag outcrop formation located offshore. The outcrop is regarded as a sensitive feature for its significance for bryozoan fossils but also importantly the feature acts as a coastal control point which exerts a significant stabilising influence on the coast to the north and south of Thorpe Ness. It is welcomed that the importance of the Coralline Crag for coastal processes is also recognised in the consultation (paragraph 4.1.5.7). It is important to ensure that damage (by trenching) to the Coraline Crag outcrop is avoided. It will need to be demonstrated that siting and routeing options can be achieved without damage to the exposed Coraline Crag outcrop.
- 2.28. An assessment has not yet been undertaken in sufficient detail to explore the potential impacts on coastal change of this landfall option. NGET need to adequately demonstrate consideration of the risk posed by coastal change to works at, and immediately landward, of the shoreline. This will include full assessment of the potential impact of coastal change on

the transition bay sites to ensure the risk of erosion to near-coast structures and buried cables and ducts is properly assessed in a precautionary fashion.

- 2.29. East Suffolk coastline is fragile, susceptible to significant coastal change and erosion and covered by numerous nature conservation and landscape designations. The landfall at Sizewell it is understood will only accommodate the Sea Link project alone and would not provide any opportunities for coordination. If this project were to proceed alongside NGV's EuroLink and Nautilus projects, the use of this landfall would not be supported due the lack of deliverability of a coordinated solution.
- 2.30. The HVDC cable corridor associated with the Site 1 Alternative option seeks to follow a broadly similar cable route to that associated with the consented East Anglia One North and East Anglia Two projects. This will bring its own challenges in terms of how this interaction would be managed. The corridor identified would involve the crossing of part of the Sandlings SPA and Leiston-Aldeburgh SSSI or alternatively crossing land north of Lovers Lane which EDF Energy are proposing to use for ecological mitigation for the Sizewell C project.
- 2.31. The offshore wind projects already propose to cross the SPA/SSSI in this area, and therefore crossing for this project (or any other projects) will need to cross the designation using trenchless techniques. This must be factored into the assessment of the project, including assessment of the need for any test areas within the designated sites. There is likely to be air quality implications which will need to be appropriately mitigated dependent on the machinery utilised.
- 2.32. The provision of cabling through an area which EDF Energy are proposing to use for ecological mitigation without an alternative option being offered as an alternative to crossing the SPA is also of significant concern.
- 2.33. There is a pinch point where the corridor crosses the Hundred River and B1122. The East Anglia One North and East Anglia Two projects chose to squeeze through to the south of Aldringham Court through a woodland subject of a Tree Preservation Order immediately north of the properties on Fitches and Gypsy Lane. Aldringham Court is a Grade II listed building, the works would therefore potentially affect the setting of the heritage asset.
- 2.34. This is a sensitive area of wooded river valley, impacts which dependent on the route of the cabling, may not be able to be satisfactorily mitigated. ESC also has significant concerns regarding the proximity of residential properties in this location which would be adversely affected by construction works. Whilst the corridor in this location remains quite wide, the area is significantly constrained by residential properties, the Hundred River, protected woodland and grade II listed building. Flood risk will also need to be carefully managed.

2.35. Given the works consented under the East Anglia One North and East Anglia Two projects, the in-combination impacts of the works would need to be very carefully considered. Insufficient details have been provided within the consultation to demonstrate that this is a viable option.

Site 3 Emerging Preference

2.36. Site 3 Emerging Preference identifies the same Aldeburgh landfall and a degree of the same HVDC cable corridor as identified for Site 1 Emerging Preference. The HVDC corridor however extends beyond the Site 1 and travels to Site 3, with a requirement for a HVAC corridor from Site 3 to the proposed Friston substation. To avoid duplication, the comments within this section will focus on the differences, where the elements are the same as the Site 1 Emerging Preference those comments will remain relevant.

2.37. The preferred HVDC route runs to the east of Friston, and Grove Wood and it is assumed to the north of the village and into Site 3. The route of the cable corridor from the point west of Friston to Site 3 is however very unclear and further information is required in relation to this route.

2.38. Saxmundham is an historic market town set in the valley of the River Fromas, a tributary of the River Alde. Site 3 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 Site 1. 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 Claylands⁸ 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.

2.39. 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.

⁸ [Ancient estate claylands - Suffolk Landscapes](#)

- 2.40. Whilst there are no designated nature conservation sites within the boundary of this site, several mapped UK Priority habitats are located around the site and therefore will form a constraint to locating a converter station on this site.
- 2.41. 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 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.
- 2.42. The western boundary of Site 3 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.
- 2.43. 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.
- 2.44. There are also footpaths which cross the site which would require diversion potentially permanently.
- 2.45. 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. The report mentions a potential temporary access off the B1121, but no details have been provided. ESC is concerned that the potential route of the construction access has not been provided, included within the search area, or assessed as part of the siting and routeing options. How access will be gained to the site is a fundamental issue which needs to be addressed to understand whether the site is deliverable or not. How operational access would be gained to the site should any of the infrastructure need replacing is also a key concern.
- 2.46. This option would then require a HVAC cable corridor back to the proposed Friston substation. This would result in a cable corridor entering the Friston site from the western side. The

proposals in addition to the construction works associated with the East Anglia One North and East Anglia Two projects, should they be constructed, would encircle the village with construction works.

- 2.47. As stated previously, it is difficult to provide detailed comments due to the high-level nature of the information provided. It is also challenging understanding the different corridors as they are laid over one another and a significant area between Saxmundham and Friston has been shaded.

Site 3 Alternative (Option 1)

- 2.48. This option involves a landfall at Sizewell, the same as the landfall identified for the Site 1 Alternative but a northern HVDC cable corridor extending to Site 3, with a HVAC cable corridor back to the proposed Friston substation. To avoid duplication, the Council's comments on this option will be confined to the HVDC cable corridor, as this element has not been part of another option which ESC has already provided comments on.
- 2.49. The cable corridor associated with this option then seeks a northern route to reach Site 3. The preferred cable corridor crosses land north of Lovers Lane as it heads northwards, which as stated previously, EDF Energy are proposing to use for ecological mitigation for the Sizewell C project. The route would need to cross either part of the Sizewell Marshes SSSI or Aldhurst Farm. EDF Energy has developed Aldhurst Farm to help compensate for the impacts on the SSSI as a result of the construction of Sizewell C. Both the SSSI and Aldhurst Farm are sensitive wetland habitats of at least national nature conservation importance. Based on the information available, it does not seem likely that the impacts of construction of a cable route across them could be adequately mitigated.
- 2.50. The northern route also interacts with part of the proposed construction area for the Sizewell C project and runs parallel with a section of the proposed Green Rail Route. It is not clear how this interaction could be facilitated and to what extent NGET has engaged with EDF Energy on this proposed interaction.
- 2.51. The northern route passes by designated heritage assets, including the Scheduled Monument and Grade I and II listed buildings at Leiston Abbey. The long-term impacts of this cable route on their settings should be fully understood and robustly assessed.
- 2.52. At present, based on the information available it is difficult to understand how the northern cable corridor associated with the Sizewell landfall is a viable option or deliverable.

Site 3 Alternative (Option 2)

2.53. This option involves a landfall at Sizewell, an HVDC cable corridor to Site 3 and a HVAC cable corridor to the proposed Friston substation. Comments have been provided on each of the above elements under the other options presented.

National Grid Substation and Connection Infrastructure

2.54. A fundamental element of the project which must be considered as part of the siting and routing 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 if these projects do not come forward in time, the construction of a new substation in the same location.

2.55. Greater information needs to be provided in relation to the implications of the connection of the Sea Link 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.

2.56. 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 HVDC and HVAC 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.

2.57. 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.

- 2.58. There are several residential properties which surround the Friston site. In relation to operational noise, the extension would need to be assessed using the guidance previously referenced and will also be subject to a cumulative assessment with the infrastructure associated with the consented 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.
- 2.59. The impact of the National Grid Substation on the surrounding heritage assets at Friston has been discussed at length by ESC during the East Anglia One North and East Anglia Two examinations. 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, increases in infrastructure, and changes to the landscape mitigation scheme.
- 2.60. 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.
- 2.61. Further details are also required in relation to how the site will be accessed during the construction and operational phases.
- 2.62. The ambiguity of the proposals in this area given the level of information already published in relation to the site is a significant concern. It is essential that significant further work is undertaken prior to any sites selected to ensure that connection options into this site are feasible.
- 2.63. The local community has been subjected to a number of 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. NGET 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 village of Friston.

Coordination

- 2.64. Notwithstanding ESC's position on the project, should Sea Link proceed, ESC requests maximum coordination between this project and the EuroLink 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 NGET 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.
- 2.65. 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.
- 2.66. In addition to the landfall, ESC supports 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.
- 2.67. 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.
- 2.68. In addition to coordination, it is essential that the full cumulative impacts of the Sea Link 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.

- 2.69. 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.
- 2.70. ESC will not support an uncoordinated approach to the development of the Sea Link project.

Siting and Routeing Summary

- 2.71. The landfall options presented are all subject to a significant number of constraints including the fragility of the Suffolk coastline. None of the options are without significant environmental challenges which is of great concern. Insufficient information has been presented within the consultation to provide an understanding of the impact of the works or demonstrate the feasibility or deliverability of the option. ESC however cannot support the use of a landfall location which cannot accommodate opportunities for coordination between the Sea Link, EuroLink, and Nautilus projects, should they all come forward. The Alternative Options presented are all served by the Sizewell landfall and do not facilitate coordination.
- 2.72. Significant further work is required to understand the potential impacts on the designated sites and functionally linked land from the Aldeburgh landfall. 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.
- 2.73. The converter station sites also both have their challenges and will result in adverse impacts albeit to a greater or lesser degree depending on the topic – 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, where it would need to be demonstrated that the local network could accommodate the expected construction and operational traffic in addition to the cumulative traffic.
- 2.74. The identified corridor options are constrained, the ecological constraints from both statutory and non-statutory designated nature conservation sites, UK Priority habitats, protected species and UK Priority species will also exist in each of the corridor options and will need to be appropriately considered. Whilst the Aldeburgh landfall and converter station Site 1 would seem to comprise the shortest cable route option overall, it would involve a greater length of

HVAC cabling compared to Site 3, HVAC cabling requires a wider cable width than HVDC. This needs to be balanced against the additional length of cabling required and the construction impacts associated with laying the cable, particularly in relation to the area around Friston.

- 2.75. Both sites also involve the potential for high level impact named walking routes as well as the rest of the public right of way network in addition to the fundamental character of the receiving and surrounding landscape and its visual amenity.
- 2.76. Significant further information is required in relation to the options and the potential impacts prior to a decision being made. The high-level nature of the information provided and the ambiguity of the proposals, particularly around the connection area has limited the Council's ability to provide detailed comments or specify a site preference.

Project Wide Comments – Socio-economics

- 2.77. The Sea Link 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.
- 2.78. 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.
- 2.79. ESC is concerned that the cumulative impact of Sea Link 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, therefore negatively affecting the visitor economy throughout the lifetime of the project(s).
- 2.80. The impact of the Sea Link 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.

- 2.81. 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.
- 2.82. ESC notes and welcomes the potential opportunity that Sea Link 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 Sea Link project is required.
- 2.83. 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

Town/Parish Council
Dunwich Parish Meeting
Walberswick Parish Council
Tunstall Parish Council
Southwold Parish Council
Ward Members
Councillor David Beavan - Southwold
East Suffolk Council Attendees
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 Bavenets 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

Town/Parish Council
Leiston Town Council
Middleton-cum-Fordley Parish Council
Theberton and Eastbridge Parish Council
Aldringham-cum-Thorpe Parish Council
Kelsale-cum-Carlton Parish Council
Ward Members
Councillor Tom Daly - Aldeburgh and Leiston
Councillor Russ Rainger – Aldeburgh and Leiston
East Suffolk Council Attendees
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

Parish/Town Councils
Friston Parish Council
Aldeburgh Town Council
Snape Parish Council
Sudbourne Parish Council
Ward Members
Councillor Tom Daly - Aldeburgh & Leiston
ESC Attendees
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