



# **Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the SeaLink Project.**

East Suffolk Council's Relevant Representation.

**Application Reference: EN020026**

**East Suffolk Council IP Reference: FA3A16664**



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<p>The Planning Inspectorate National Infrastructure Planning Temple Quay House 2 The Square Bristol BS1 6PN</p> <p>Email: <a href="mailto:SouthEastAngliaLink@planninginspectorate.gov.uk">SouthEastAngliaLink@planninginspectorate.gov.uk</a></p>	<p>Application Reference: EN020026 ESC Reference: ESC Relevant Representation – SeaLink – v9 Date: – for submission Please ask for: Grahame Stuteley BSc (Hons) MSc MRTPI – Principal Planner Energy Projects Clara Peirson – Assistant Planner Energy Projects</p> <p>Customer Services: 03330 162 000</p> <p>Email: <a href="mailto:grahame.stuteley@eastsuffolk.gov.uk">grahame.stuteley@eastsuffolk.gov.uk</a> <a href="mailto:clara.peirson@eastsuffolk.gov.uk">clara.peirson@eastsuffolk.gov.uk</a></p>
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## Contents

i. Purpose of this Relevant Representation .....	4
1. Introduction .....	4
2. ESC's Pre-application Engagement with the Applicant .....	5
3. ESC's Overarching Position on SeaLink.....	6
4. Sealink Project Need Case .....	7
5. Local and National Policy.....	7
6. Summary of Principal Matters for Examination .....	7
6.1 ESC's Position.....	8
6.2 Lack of Coordination.....	9
6.3 Landfall .....	10
6.4 HVDC Cable Route .....	11
6.5 Saxmundham Converter Station Co-location .....	11
6.6 Saxmundham Converter Station Access and River Fromus Crossing .....	13
6.7 HVAC Cable Route .....	15
6.8 Friston Substation.....	15
6.9 Construction Compounds .....	17
6.10 Construction Noise and Vibration – Working Hours .....	17
6.11 Impacts on Health and Wellbeing .....	18
6.12 Community Benefits and Compensation.....	18
6.13 Socio-economics, Leisure and Tourism .....	19
6.14 Ecology.....	19
7. Statement of Common Ground .....	21
8. ESC's forthcoming Local Impact Report .....	21
Appendix A – Town and Parish Council Technical Engagement Meeting – 22 <sup>nd</sup> May 2025.....	22

Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the SeaLink Project – East Suffolk Council’s Relevant Representation.

**i. Purpose of this Relevant Representation**

In accordance with Section 56 ‘*Notifying persons of accepted applications*’ of ‘*The Planning Act 2008*’, and the requirements set out within Regulation 4 of ‘*The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015*’, this submission to the Planning Inspectorate (PINS) accompanies East Suffolk Council’s registration to become an interested party for the duration of the SeaLink project’s DCO examination process. It provides ‘*an outline of the principal submissions*’ which the Council proposes to make in respect of the application.

The guidance contained within PINS Advice Note 2 states that ‘*A Relevant Representation should include a summary of what the local authority agrees and or disagrees with in the application, what they consider the main issues to be, and their impact*’. The following representations, therefore, provide a summary overview of East Suffolk Council’s principal concerns relating to the SeaLink project to assist the appointed Examining Authority (ExA) with their initial assessment of the principal issues for examination. All of the matters discussed in this Relevant Representation will be expanded on in the forthcoming Local Impact Report (LIR).

**1. Introduction**

1.1 On 4<sup>th</sup> March 2022, National Grid Electricity Transmission (NGET) (the Applicant) submitted a request for direction pursuant to Section 35 of the Planning Act 2008 to the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for the proposed ‘*South East Anglia Link*’ project (referred to as SeaLink) to be treated as development for which development consent is required. A decision was issued on 31<sup>st</sup> March 2022 confirming the proposed project can be treated as such in accordance with section 35(1) of the Planning Act.

1.2 On 23<sup>rd</sup> April 2025, the Secretary of State (c/o the Planning Inspectorate) accepted the application for the SeaLink project for a Development Consent Order (DCO) under the Planning Act 2008. As set out in the Section 55 acceptance letter from PINS to NGET, this decision was made by officials on behalf of the Secretary of State for Housing, Communities and Local Government under delegated powers. ESC, as a host authority, is registering as an Interested Party by submitting this Relevant Representation to the Planning Inspectorate by the closing deadline of 23<sup>rd</sup> June 2025.

1.3 We note the non-technical description of the proposed development as detailed on the Applicant’s submitted Application Form, which states ‘*The Proposed Project is to reinforce the transmission system in the South East of England and East Anglia. This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent*’.

1.4 ESC has undertaken a comprehensive review of the Applicant’s extensive submission materials for this project (approximately 364 separate documents covering 1,000s of pages of information), so as to be able to understand the scope of the proposed SeaLink project and to identify how it interacts with and will impact upon the district of East Suffolk. We understand that it is intended that the SeaLink network reinforcement project will run from the proposed Friston substation in the Sizewell area of Suffolk to the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent. We note that the route is described in chapter 4 of the Environmental Statement (application document 6.2.1.4) and is shown on the suite of Location Plans (application document 2.2), as well as other application plans such as the Indicative General Arrangement Plans for Suffolk (application document 2.14.1), Kent (application document 2.14.2), and Marine (application document 2.14.3). The Offshore element of the scheme proposes a subsea HVDC cable covering a distance of approximately 122km running between the Suffolk landfall location (between

Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

1.5 As far as the Suffolk Onshore Scheme is concerned, we understand that the Applicant is proposing a connection from the existing transmission network via the Friston Substation, including the substation itself should NGET be required to provide this. It should be noted, however, that ESC, has some concerns in this respect. The construction of Friston Substation has already been permitted and granted development consent not to serve the SeaLink project, but to serve two other entirely unrelated third-party projects, namely the ScottishPower Renewables (SPR) East Anglia ONE North and TWO offshore wind farm projects. ESC will require further clarification from the Applicants to understand how it intends to connect in to and use Friston Substation if that sub-station has already been constructed under the SPR consents. The project also includes a high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station on land east of Saxmundham.

1.6 The 2GW HVDC converter station would include a permanent access from the B1121 and a new bridge over the River Fromus. The converter station itself would be up to 26m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment). The project also proposes a HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900m inshore from a landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

1.7 This Relevant Representation is designed to provide the ExA with a summary of the Council's principal concerns together with supporting context (being expanded on in greater detail within the forthcoming LIR submission by ESC). Having reviewed the Applicant's current DCO application submission materials, this Relevant Representation, therefore, provides initial feedback and clarifies our position on a number of relevant topic matters which it is considered, as presently proposed, will detrimentally impact our District.

1.8 Whilst ESC recognises the benefit SeaLink will deliver by helping to reinforce the National Grid, thereby facilitating the UK Government meeting its renewable energy targets, it is ESC's view that such benefit should not and cannot be secured at the expense of East Suffolk's local communities. The proposed project (if consented) must avoid the introduction of significant and long-lasting damage to the local built and natural environment, local communities and the tourist economy. The local impacts of the projects and their cumulative impacts must be genuinely considered and adequately addressed by the Applicant. The areas where the Council has significant concerns and where the issues remain unresolved have been outlined below, and these matters will be further expanded upon in future representations submitted separately.

## **2. ESC's Pre-application Engagement with the Applicant**

2.1 ESC has attempted to engage with the Applicant by responding to the project's pre-application Scoping Report (October-November 2022), the non-statutory consultation (October-December 2022), the statutory consultation and Preliminary Environmental Information Report (PEIR) (October-December 2023), the additional consultation (July-August 2024), and the local engagement and project update (November 2024-January 2025). Copies of all engagement activities during the pre-application stages for the SeaLink project are available on the East Suffolk Council website, should these be required by the ExA for context<sup>1</sup>.

2.2 As alluded to in ESC's recent response to the Adequacy of Consultation (held 28<sup>th</sup> March-11<sup>th</sup> April 2025), the Council remains disappointed by the lack of genuine engagement undertaken to date by the Applicant. What were intended to be helpful and meaningful contributions by ESC provided through the pre-application

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<sup>1</sup> <https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/sea-link/>

stages do not appear to have been positively taken on board and in some respects ignored – as discussed in this Relevant Representation.

2.3 The Council is of the view that its involvement to date has been largely dismissed. This undervalues the positive contributions made by all those involved, on behalf of the communities we serve and is in direct conflict with the underlying ethos of the NSIP pre-application process.

2.4 ESC therefore wishes to underline to the ExA that concerns were raised with the Applicant in relation to the depth and quality of engagement on the project undertaken during the pre-application stages. Although the higher-level project overview meetings on SeaLink were scheduled regularly throughout the pre-application period, the detailed engagement expected and sought by the Council on a technical level was extremely limited and basically inadequate. Ahead of the statutory consultation, ESC would have expected technical officers to be regularly engaged in all the thematic areas, but this was not the case. Whilst a limited number of meetings were held with technical officers, these were insufficient in number and depth and there has not been the appropriate opportunity to feed into the assessments and preliminary environmental information. In relation to some vitally important topic areas, including coastal processes, ecology, surface water drainage and flood risk, and air quality, there has been virtually no engagement. These concerns were raised with the Applicant at the Statutory Consultation stage, highlighting that engagement with ESC on the technical details of the project must be improved going forward. Of equal importance, it was emphasised that engagement with the local communities is also essential and should be a key feature of the pre-application phase.

2.5 ESC warned the Applicant as it approached the intended submission period and considering the emerging government position on requiring better coordination with other Nationally Significant Infrastructure Project promoters locally, that in light of the Applicant's failure to engage with both the Council and the local community, ESC's concerns would have no choice but to respond negatively to the Applicant's proposals through the DCO Examination process. This is not ESC's preferred method of responding to major infrastructure projects in its District and simply diverts the Council's attention from the core obligations and duties that it owes to the local community.

2.6 NGET should not rely on the fact that identification of SeaLink as an Accelerated Strategic Transmission Investment (ASTI) project means the project can be delivered at any cost.

2.7 In summary, ESC is strongly of the view that more should have been done by the Applicant to limit and reduce the uncertainties and areas of concern raised by ESC prior to the submission of the DCO application. That said, we will work with the Applicant over the pre-examination and examination periods to bottom out the Council's concerns to the satisfaction of ESC technical officers, elected members and the local communities we represent.

2.8 In light of the topics discussed above, following acceptance of the application for examination, ESC wanted to engage further with the Towns and Parishes due to be impacted by this project. A meeting was held at the ESC offices on 7<sup>th</sup> May 2025 to provide host Town and Parish councils an opportunity to air their engagement and resourcing concerns, followed by a more focussed session held on 22<sup>nd</sup> May 2025 to discuss the project's merits and enable ESC officers to listen and incorporate local concerns into this Relevant Representation. (Appendix A contains a summary of the meeting held on 22<sup>nd</sup> May 2025).

### **3. ESC's Overarching Position on SeaLink**

3.1 ESC's position on the SeaLink project at the 2023 statutory consultation was one of objection. This position has been maintained since that time throughout the pre-application process. In light of the lack of engagement by the Applicant as outlined above, ESC has no choice but to continue to object to the SeaLink

project in view of the detrimental impacts that will be imposed upon the local communities who will be compelled to host and neighbour the project's onshore infrastructure. It is apparent that the SeaLink project will result in further unacceptable harm to the communities, environment and economy of East Suffolk over and above the other numerous infrastructure projects that have already been forced upon the local community and as discussed below, it is not yet considered that the timing of the need for the project is robustly proven. The operation of Sizewell C is potentially at least 10 years away and throughout the pre-application stage, ESC has requested the further consideration of alternative offshore solutions.

3.2 In the event that the project is consented, ESC remains fully committed to working with the Applicant in the interests of our local communities and environments, to secure the best outcomes possible. ESC will expect the Applicant to provide acceptable levels of mitigation and compensation to offset the impacts introduced by the SeaLink project – and will expect those elements to be formally recognised by the inclusion in the Order of Requirements and/or protective provisions – as may be appropriate.

#### **4. Sealink Project Need Case**

4.1 The project is said to be required to transfer energy between Suffolk and Kent. However, the need for the project only arises when and if Sizewell C and LionLink are operational, and the latter is not yet consented.

4.2 It is the view of ESC that the reinforcement is not yet required, and should the identified projects not become operational at the times anticipated or not be delivered at all, then it follows that this fundamentally changes the need for SeaLink.

4.3 If the SeaLink project is consented, its implementation should be conditional on the other two projects being committed and this remains the case despite the Government's recent announcement as to the initial provision of funding for Sizewell C.

4.4 With regard to the Kent perspective, SeaLink serves to reinforce the south coast grid, but it is not considered that it has adequately been demonstrated that reinforcement by a means other than SeaLink is not possible. If the applicant cannot demonstrate a robust case for need for the project, then all alternatives must be assessed.

#### **5. Local and National Policy**

5.1 A detailed review and commentary on both local and national planning policy and guidance will be provided in the LIR.

5.2 However, it is worth highlighting within the Relevant Representation that the East Suffolk Strategic Plan 'Our Direction 2028'<sup>2</sup> presents the Council's key ambitions and priorities for the next four years. Our aim is to promote a bright, green, open, free, and fair future for all East Suffolk, and our priorities are environmental impact, sustainable housing, tackling inequalities and the promotion of a thriving economy. The Strategic Plan notes the Council's commitment to achieving Net Zero as a Council by 2030, in addition to supporting, promoting, and implementing green technologies and contributing to local and national energy infrastructures. However, the Council also commits within the Plan to '*work hard to ensure our residents benefit from Nationally Significant Infrastructure Projects, adopting policies that encourage investment which supports impacted communities*'.

#### **6. Summary of Principal Matters for Examination**

The following section provides a summary of the primary areas where the Council has either significant concerns or where matters remain to be agreed. It also contains a list of matters that we feel should be brought to the ExA's attention ahead of examination. ESC reserves the right to amend our position on matters

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<sup>2</sup> <https://www.eastsuffolk.gov.uk/yourcouncil/how-your-council-works/east-suffolk-strategic-plan/>

or to raise additional topics throughout the examination as deemed necessary, in response to new materials being submitted into the examination. All matters raised in this Relevant Representation will, as appropriate, be further expanded upon in the Local Impact Report and other future representations submitted separately.

#### 6.1 ESC's Position

- 6.1.1 ESC's formal approach is to be supportive of well-developed, well-designed, and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPSs). This, however, has not been the case to date. Instead, ESC has had to face and deal with numerous infrastructure projects in recent years all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the District. This cannot continue to occur at the expense of Suffolk's environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging, unsustainable and unacceptable situation.
- 6.1.2 ESC acknowledges that renewable energy and enhanced transmission infrastructure (both offshore and onshore) will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. However, the shift towards the delivery of low carbon and renewable sources of energy will only be successfully achieved if developments such as the SeaLink project are only permitted having first taken into account the very real impacts they will have on the landscape, natural environment and local communities that are being forced to host or neighbour such development.
- 6.1.3 ESC objects to the SeaLink project due to the very clear detrimental impact that it will have on the local communities set to host and neighbour the onshore infrastructure. The project is said to be required to transfer energy between Suffolk and Kent. However, the need for the project only arises once Sizewell C and LionLink are operational, and as noted above, the latter is not yet consented, and the former is still awaiting the Final Investment Decision (FiD). It is therefore very clear that the reinforcement is not yet required. The approach adopted by NGET to date is an assumption that as Sealink has been identified as an Accelerated Strategic Transmission Investment (ASTI) project, it can be delivered at any cost. This is not the case.
- 6.1.4 In spite of its objection to the SeaLink project, ESC is still prepared to work in a productive and constructive manner with the Applicant in order to secure the best possible outcomes for the local community and environment, including acceptable mitigation and compensation for all impacts, in the event that Development Consent is granted by the Secretary of State – but only provided the same is the case for the Applicant.
- 6.1.5 In this context, ESC believes that every opportunity should be taken to secure maximum coordination between the various infrastructure projects in the District so as to minimise impacts on local communities and the environment.
- 6.1.6 ESC has previously requested that National Grid PLC comprehensively and robustly explore every opportunity for coordination of the SeaLink and LionLink projects at all stages of the



development consent process<sup>3</sup>. It is imperative, given the pressures this area of East Suffolk is facing, that the cumulative and in-combination effects with other proposed and consented projects are fully taken into account, considered and all opportunities for coordination identified and maximised. This is necessary and essential so as to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environments and the local communities, who have been hit by a constant barrage of energy infrastructure projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.

- 6.1.7 In light of this, ESC requests that consideration be given to an offshore grid solution and the use of brownfield solutions for the onshore infrastructure - this is an essential priority for the Council and the District. The principle of subsea interconnectors is an important part of an offshore focused approach and genuine consideration must be given to ensure that the connections are made in the right locations.

## 6.2 Lack of Coordination

- 6.2.1 ESC is disappointed at the lack of meaningful engagement by the Applicant with other energy scheme promoters locally, reducing opportunities to reduce cumulative and in-combination impacts. It is ESC's view that the project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination. Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in our region over the next decade have been missed or simply ignored. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects on the basis of cost, with little regard being paid to the consequential long lasting damage that so much onshore infrastructure proposed within the East Suffolk district is causing and will continue to cause. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken place nor has any thought been given to mitigating the delivery of future energy infrastructure in this region. Instead, our local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another. This is unsustainable.
- 6.2.2 The main part of the SeaLink project which facilitates elements of coordination with other proposed projects is at the co-located converter station site at Saxmundham and the HVAC link into the proposed Friston substation. However, co-location does not automatically mean coordination and ESC are mindful that the financial interests and Ofgem regulatory constraints facing the SeaLink project may restrict the good will and capabilities of other project promoters whose project timeframes are following that of SeaLink. This has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located aspects of the projects.
- 6.2.3 The lack of coordination evident between SeaLink and other proposed Nationally Significant Infrastructure Projects (NSIPs) connecting in the same locality is a significant concern. ESC is strongly of the view that maximum coordination and collaboration should be inherent within the design and ambitious solutions being proposed as the revised NPSs state. Coordination is more than just co-

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<sup>3</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Energy-Projects/Sea-Link/13-SCC-and-ESC-Coordination-of-Interconnectors-letter-to-National-Grid.pdf>

location and it is essential that there is a real and visible reduction in the disruption and environmental impacts that these infrastructure projects are causing.

- 6.2.4 In order to deliver a genuinely coordinated approach, NGET should have sought to align the SeaLink project's timeframe for examination with that of the LionLink project, both spatially and temporally in terms of consenting and delivery. The alignment of timescales would allow a shared or conjoined examination with the appointment of the same examining panel to consider the projects. This would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the coordinated design and cumulative impacts of the projects.
- 6.2.5 The cumulative impact of undertaking works and co-locating multiple projects must be carefully considered and assessed in terms of noise and vibration, air quality and dust, light and other environmental protection matters. Coordination should seek to reduce overall impacts and prevent magnifying such impacts by their cumulative effects.
- 6.2.6 In reference to SeaLink's potential interaction with offshore wind energy generation, ESC would draw attention to the fact that the North Falls offshore wind farm project has retained an '*Option 3: Offshore electrical connection, supplied by a third-party*'. Realistically, this can only relate to the SeaLink project which passes close to the wind farm. We appreciate that the primary connection being pursued by that project (which is currently in examination: EN010119<sup>4</sup>) is to utilise an onshore connection linking into the East Anglian Connection Node (EACN) proposed as part of the NGET Norwich to Tilbury overhead 400kV pylon project. This would be located in the District of Tendring, Essex. Should an offshore connection become the option selected for North Falls, however, due to any unforeseen issues or delays with the yet to be consented Norwich to Tilbury EACN, then such a scenario may require additional onshore infrastructure in East Suffolk. This would not be supported by ESC. Had an offshore option been deemed viable, it would have been essential that stakeholders and the decision maker had been made aware of the direct and indirect impacts. If allowing this offshore connection necessitates greater quantities of onshore infrastructure, this must be fully considered within the DCO application to ensure a fair, robust and transparent process. An offshore wind farm connection with SeaLink could also reduce the transmission capacity of the SeaLink project, potentially resulting in a second connection between Suffolk and Kent to facilitate the original purpose of the SeaLink grid network reinforcement – if a need can be demonstrated. This would not be supported by ESC.

### 6.3 Landfall

- 6.3.1 The landfall selected 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 and Essex Coast and Heaths National Landscape and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Royal Society for the Protection of Birds (RSPB) North Warren Reserve, and close to the Sandlings Special Protection Area. 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. It follows that the disruption created in the area by the proposed SeaLink project would adversely impact both the local community and the tourist economy. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance.

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<sup>4</sup> <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010119>

- 6.3.2 The marine HVDC cables would cross under Leiston-Aldeburgh SSSI, North Warren RSPB Reserve and Thorpe Road. The Applicant suggests that direct impacts on the designated sites will be largely avoided. Whilst this is reassuring, the ExA should satisfy themselves that ESC's concerns are fully addressed. Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted and the potential risk of 'frack out' associated with this technique and the impacts this could have must be fully considered. ESC has experience of other NSIPs utilising HDD techniques and, on each occasion, 'frack outs' have occurred. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address potential impacts which could arise must be fully explored.
- 6.3.3 Access to the landfall area by large vehicles is also very limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The western end of the landfall and cabling corridor are in close proximity to residential properties. The potential for noise and vibration disturbance resulting from landfall activities must be fully considered in relation to nearby residential properties.
- 6.3.4 In reference to the proposed HDD at landfall being used to mitigate impacts on the SSSI, the Applicant will be expected to collaborate with Natural England and RSPB to ensure that this mitigation is feasible and adequately secured.

#### 6.4 HVDC Cable Route

- 6.4.1 There are numerous negative aspects in landscape terms associated with the proposed HVDC cable route. It is inevitable that an open cut trench laying method for cable installation and the associated haul road will lead to adverse impacts on the fabric of the landscape i.e. losses of sections of field boundary hedgerow and tree removals, although it is recognised that to varying degrees, these are largely of a temporary nature. This vegetation removal would, however, be occurring in addition to the clearance works that have already taken place in the district as part of other NSIP projects, including Sizewell C.

#### 6.5 Saxmundham Converter Station Co-location

- 6.5.1 ESC understands that the Saxmundham site was identified due to its apparent ability to accommodate more than one converter station at a single co-located site, and that NGET has now confirmed the preferred location of the SeaLink converter station within the wider context of that landscape. They have refined the order limits to remove the areas that may be required for the future NGV projects and ESC have been working with NGET and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated way. NGET's intention to work with NGV to develop a coordinated approach to the development and delivery of the SeaLink and LionLink projects is acknowledged. However, these intentions and aspirations must be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on environmental, residential, and socio-economic receptors within East Suffolk.
- 6.5.2 If SeaLink alongside other NSIPs such as the proposed LionLink project be progressed within our district, this should only be on the basis of a coordinated approach. ESC is seriously concerned about the cumulative local impacts of multiple projects, with the district currently facing one of the largest construction projects in Europe (Sizewell C), in addition to SPR's EA1N, EA2 and EA3 projects. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative

that the converter station site is genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and still achieve long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.

- 6.5.3 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. 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.
- 6.5.4 It is also important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. ESC has stressed to NGET throughout the pre-application stage that the Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation, and the ExA should satisfy themselves that this is indeed the case.
- 6.5.5 ESC has previously raised concern about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. This area also provides an opportunity to commit to early planting close to receptors.
- 6.5.6 In relation to operational noise emanating from the proposed converter station site, at the Statutory Consultation stage, ESC requested a below background sound rating level as the acoustic character of the area is quiet and rural, and the SeaLink project will introduce a potential persistent industrial noise into this area. Projects of this scale have the responsibility and means to ensure they achieve the best possible outcome, and this begins with a thorough assessment considering all aspects of introduced noise and not simply relying on calculated levels where there is an inherent uncertainty. Noise creep is a concern for ESC particularly in the co-location scenario. The ExA should satisfy themselves that a robust assessment which considers the character of the area and character of that noise has indeed been undertaken.
- 6.5.7 There are various negative aspects in landscape terms associated with the proposed converter station site and the River Fromus crossing site. It is established by the required assessments, and it is stated in the Environmental Statement (ES), that, for the Saxmundham converter station site and the Fromus crossing site, there will be significant adverse effects on their respective landscape's character, during construction, operation, and decommissioning. It is acknowledged in the ES that these significant adverse effects will continue through to Year 15 for both landscape character and visual amenity for the same viewpoints. These lingering adverse effects will persist partly because of the nature of the receiving landscape, and also because of the difficulties of establishing new tree planting in the east of Suffolk.
- 6.5.8 The Converter Station site has been cleared of almost all former woodland and hedgerows and field boundaries since the 1960s, and the proposed early planting and new screening will see the return of woodland areas, other trees and hedgerows to the locality. Long term river valley woodland



planting will not only help screen the Fromus crossing bridge and approach route but will also provide a lasting long-term benefit to the character of the river valley landscape which may be regarded as a preferable alternative to the current relatively short-term rotation cropping of cricket bat willow plantations. New planting around the Converter Station will be a necessary addition to local green infrastructure and wildlife connectivity.

- 6.5.9 If the project is consented, ESC will expect NGET to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a Requirement within the DCO. In this context, ESC would highlight the pre-construction planting agreed under the SPR consents around the Friston substation. In addition, ESC will not accept a scenario whereby the mitigation planting delivered under one project's consent (i.e. SPR's proposed Friston substation mitigation planting) is subsequently harmed and its function diminished by another project following it (i.e. SeaLink's HVAC cable route crossing SPR's proposed substation mitigation planting).

#### 6.6 Saxmundham Converter Station Access and River Fromus Crossing

- 6.6.1 Access to the proposed Saxmundham co-located converter station site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. The proposed Fromus crossing on the confirmed western access route remains a concern for ESC as it will require significant intrusive engineering and design work which presents a substantial challenge to NGET to deliver, along with the associated expense. At the last round of pre-application consultation, being ESC's last formal engagement on the selected access route prior to submission, we stressed that robust justification is required for ruling out the alternative accesses, noting the delivery of the Fromus crossing will require significant engineering works, the full detail of which had not been clearly set out. The confirmed western access has the potential to create significant environmental, landscape, and heritage issues.
- 6.6.2 ESC has raised concern about the impact of the Fromus crossing in the landscape, introducing a crossing of significant scale in a sensitive landscape setting in proximity to the Grade II Listed Hurts Hall and Grade II\* Listed Church of St John the Baptist. ESC welcomes the project's engagement with the Suffolk Design Review Panel and its feedback is an important element for NGET to consider and incorporate into the final bridge design. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including genuine engagement with key stakeholders.
- 6.6.3 Although existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction, a new edition is due to be published in the very near future, and when it is, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. This may be particularly relevant to the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point and which the Council considers may have been under assessed in terms of its cumulative stem diameter, given its multi-stemmed layered form.
- 6.6.4 A full tree survey and Arboricultural assessment for trees adjacent to the Fromus crossing should be prepared for discussion using up to date 2025 guidance materials. ESC welcomes the effort to avoid the Veteran Horse Chestnut tree that stands in the vicinity of the River Fromus crossing, but

prior to submission, ESC had not seen any detailed tree survey and Arboricultural Impact Assessment information, including what other important trees could be lost as a result of efforts to avoid the Horse Chestnut. As stated above, the issue is further complicated by the prospect of the formal introduction of a new version of BS 5837 Trees in Relation to Design, Demolition and Construction in 2025 which has significantly greater protection recommendations for Veteran and Ancient trees, and which could still be a potentially unsurmountable constraint for the crossing. The timing of the new British Standard is also a tricky issue for the submission because as soon as it enters force, ESC will expect all tree survey information to be re-submitted according to the new guidance.

- 6.6.5 The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity. During the pre-application stage, the scale of the bridge over the River Fromus was increased in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. The increased construction activity and associated vegetation removal as a result has the potential to have a higher magnitude of effect on the Fromus Valley Landscape Character Area. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is of a special quality and a feature of the Landscape Character Area.
- 6.6.6 The removal of the mature woodland vegetation along a section of the River Fromus will alter the vegetation network. A bridge of this footprint and height would remain an incongruent feature within the local landscape, even once the mitigation planting is established. Landscape planting around the bridge would assist in lessening this effect in the long-term. However, ESC is aware of significant concerns in the community about the potential loss of veteran trees and ancient woodland, particularly around the Saxmundham converter station site and Fromus crossing.
- 6.6.7 In terms of design and heritage considerations, moving the Fromus bridge approximately 40m north along the river will bring it closer to Hurts Hall and to the south of Saxmundham. This will make the crossing more prominent in important views toward Hurts Hall (Grade II) and the Church of St John the Baptist (Grade II\*), and the Saxmundham Conservation Area. The potential impact on the Conservation Area and on the Church of St John the Baptist is a result of the introduction of the bridge and the permanent access, however the potential impact of the mitigation planting around the bridge and access is also an important consideration. Introducing large areas of planting where there are currently open views toward a heritage asset also has the potential to affect their significance if it obstructs those views.
- 6.6.8 The western access also presents a number of concerns more generally regarding the access route to be taken by construction traffic. Specifically, regarding the use of Abnormal Indivisible Loads (AILs), the transportation of heavy plant for the purposes of grading the site and 'cut and fill' activities, and also the delivery of large cable drums. Vehicles using the A12 would need to cross various culverts which have a maximum weight limit which requires detailed assessment. Additionally, the crossing of the rail line using the Suffolk County Council (SCC) owned asset Benhall Bridge presents another weight limit constraint, with this being understood to have a maximum bearing strength of circa 46 tons, significantly less than a 400kV transformer. ESC defers these matters to SCC as Highways Authority; however, we support SCC's concerns. The use of overbridging

methods by NGET, or statutory powers, has not been discussed in detail prior to the submission of this application. The A12 junction, culverts and rail bridge at Benhall have also not been included in the Suffolk onshore order limits. The views of Network Rail should also be sought by the ExA in relation to the Benhall bridge weight limit and the potential use of over bridging methods.

- 6.6.9 Without the detailed justification supporting the western access route or an understanding as to whether an alternative access arrangement is possible which would not involve the need to cross the Fromus, ESC cannot accept or agree with NGET's conclusions that the western access is the best option.

#### 6.7 HVAC Cable Route

- 6.7.1 NGET's decision to exclude cable ducts and infrastructure associated with NGV's project therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and SeaLink. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between SeaLink and the NGV project will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV's assessments of the best cable route will be similar to those reached by NGET. ESC is of the view that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the SeaLink project, this would meaningfully reduce the significant environmental impacts of both projects.

#### 6.8 Friston Substation

- 6.8.1 An uncoordinated and piecemeal approach to the cable ducts associated with SeaLink and LionLink will result in multiple separate cable routes entering the Friston substation site, subsequently adversely affecting and removing the mitigation planting around the Friston substation agreed under the East Anglia One North and East Anglia Two project consents. This was required to mitigate the impacts of the substation on Friston, and a key element of that mitigation is landscape planting. It is unacceptable for multiple successive projects to come forward and diminish and damage that mitigation planting by actively avoiding coordinating cable routes between projects. There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the consented landscape mitigation. ESC has a strong preference for NGET to use HDD to minimise adverse impacts on this landscape mitigation and this has been raised in multiple meetings by ESC officers prior to the submission of the DCO application. ESC understands, however, that NGET are reluctant to HDD under the consented landscape mitigation for the SPR projects due to cost, being regulated by Ofgem whose primary function is to protect the consumer. The alternative, however, is open cut and fill trenching through the landscape mitigation. This goes against the fundamental principle of the landscape mitigation scheme, a required measure for the SPR consents to help mitigate landscape visual impacts in the vicinity of Friston village.
- 6.8.2 Although NGV are not regulated in the same manner as NGET, NGET's justification of cost being the primary reason not to HDD under SPR's approved landscape mitigation would subsequently restrict NGV's ability to use HDD methods. Any future desire for a coordinated HVAC to use HDD methods to avoid disruption to the landscape mitigation should not be restricted at this stage by NGET. ESC reiterates that it is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects.

ESC therefore continues to request that NGET review their position on this and include the ability within their DCO to provide the ducting for the LionLink project which would help to reduce unnecessary disruption to the local community, environment and consented and secured mitigation planting.

- 6.8.3 At present there remains discrepancies between the project's Order Limits around Friston when compared to the Order Limits consented by SPR. This includes the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed should SeaLink's connection Scenario 2 be chosen for the project (i.e. where NGET provides the Friston Substation in the absence of SPR).
- 6.8.4 As currently presented, the draft DCO provides far less protection to the community and the environment under a Scenario 2 connection. The starting point for a project alone connection scenario should emulate the embedded mitigations for the SPR project consents, noting the many longwinded discussions held at the examination leading to the mitigation finally approved. The embedded mitigation under either connection scenario will need to be secured through the DCO.
- 6.8.5 Whilst Scenario 2 presents a substation for SeaLink's connection only at Friston, and it is noted that this would therefore not include the SPR projects which gained consent for two separate substations (one for EA1N and one for EA2's connection, plus a third substation for National Grid), the level of mitigation surrounding the substation site should not be watered down given the existing sensitivities of the local communities in that area. After all, ESC notes that the ExA for the SPR projects in Section 28.4.4 of the Recommendation Report (Volume 2 – Chapters 18-31<sup>5</sup>) stated - *'The local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. However, the benefits of the Proposed Development principally in terms of addressing the need for renewable energy development identified in NPS EN-1 outweigh those effects'*. ESC wishes to stress that whilst the overarching need case was found to outweigh the adverse effects introduced, the agreed mitigation across the projects were found to only just be sufficient. This reinforces ESC's view that NGET should be using the SPR consent as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston. If consented, NGET also have a duty to provide an exemplar development, given the national significance and justification being presented in the Applicant's need case. Additionally, they should be setting the bar high for projects for the future to follow their precedent.
- 6.8.6 ESC draws attention to the historical surface water flooding which has been experienced downstream in Friston. The village has been subject to surface water flooding on multiple occasions. It is important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects. ESC defers to the Lead Local Flood Authority (LLFA) and Environment Agency (EA) on flood matters but supports the embedded measures. A green field runoff rate means that NGET will not make the existing flood issue any worse, in the same way that SPR were required to do so under their own DCO consents. As the ExA will learn, there is an existing flooding issue in Friston

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<sup>5</sup>

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010061-EA2-Recommendation%20Report-Vol2\\_Ch18-31%20COMPLETED.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010061-EA2-Recommendation%20Report-Vol2_Ch18-31%20COMPLETED.pdf)



which has been an issue for local residents for many years. It is understood that this primarily links back to the existing watercourse not being sufficiently maintained and silting up over time, reducing the capacity to capture and move surface water runoff. This results in flooding during times of heavy rain or ground water saturation.

- 6.8.7 ESC considers that this existing and well documented issue presents an opportunity for legacy project benefits, if the project is consented. Reducing existing and known flooding issues in the village of Friston would provide a lasting benefit for the local community and this should be fully explored over and above the requirements of the project. A legacy benefit of this nature would be supported by ESC, however, any such legacy benefit would need to be balanced against any other impacts introduced by the project.

#### 6.9 Construction Compounds

- 6.9.1 ESC has reviewed the indicative location of the construction compounds for the Suffolk Onshore Scheme (illustrated on Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk, [APP-038]). ESC request that NGET seek to coordinate construction compounds with the NGV LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site. It is essential that the compounds remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to protect the amenity of nearby receptors.

#### 6.10 Construction Noise and Vibration – Working Hours

- 6.10.1 There are several matters of concern in respect to construction noise and vibration that require further consideration by the Applicant. ESC notes the SeaLink project's proposed core working hours as summarised within Section 3.3 of Document 6.1 Environmental Statement Non-Technical Summary [APP-041] which states that *'the core construction working hours would be...07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays...this excludes start up and close down activities, which can take place for up to one hour either side of the core working hours.'* It is also noted that *'there are operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times.'*
- 6.10.2 Throughout the pre-application consultation stages with the Applicant, 0700-1900 Monday to Friday and 0700-1300 Saturday with no activity Sunday or Bank Holidays were the suggested working hours during construction. This aligns with other projects in the district as discussed below and provides residents with a period of respite from construction activity. However, this was changed prior to submission to include Saturday afternoon, Sundays and Bank Holidays, and although the Applicant has reduced the hours a small amount in the application, they still propose 7 days a week working. These amended hours of working are not accepted by ESC.
- 6.10.3 With the number of NSIPs in this area and the likely additional impact of SeaLink, residents require respite. SeaLink alone will create a number of significant adverse and adverse effects, although it is noted that the Applicant considers that with mitigation, significant adverse effects are not predicted. This conclusion is yet to be tested. It is crucial, however, that residents get regular breaks in what is a very noise sensitive area and that the proposed development is well managed

and controlled. Reasonable hours of work represent one of the key measures to reduce impact on residents and should be seen as such.

- 6.10.4 The Applicant suggests that longer working hours will result in the project's construction being completed sooner, but considering the construction impacts of other projects, and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant in any case if all are consented. Whilst we appreciate there is a balance to be struck, respite in these extended durations must be given full consideration. These are not small or isolated developments that once over will see the end to impact, but part of a wider package of works and must be considered as such. Given all other comparable projects provide this respite (including projects promoted by SPR), it would seem obtuse to now start including these periods and creating impact at times where we and other projects have worked hard to prevent it, particularly given the spatial relationship between SPR's projects and the proposed SeaLink project.

#### 6.11 Impacts on Health and Wellbeing

- 6.11.1 It is essential that NGET genuinely engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the SeaLink proposals are likely to further exacerbate these existing issues. It is important to stress that increases in working hours can have significant adverse effects on people's health and wellbeing. ESC has continually stressed throughout the pre-submission engagement with the Applicant that our district is home to multiple consented, planned and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which can compound the effects on people's health and wellbeing.
- 6.11.2 Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities.

#### 6.12 Community Benefits and Compensation

- 6.12.1 If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. The Council would welcome further engagement with the Applicant on this matter. We understand the communities may have ideas on areas to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that SeaLink is not being developed in isolation - there are multiple other projects proposing compensatory measures, so there is potential for NGET to coordinate compensation associated with SeaLink with other measures proposed by other project promoters.

#### 6.13 Socio-economics, Leisure and Tourism

- 6.13.1 ESC is concerned that the cumulative impact of SeaLink 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. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s).
- 6.13.2 The impact of the SeaLink scheme will clearly 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. Should this project proceed, it is essential that this impact is appropriately considered, and appropriate mitigation is provided to support the continued success of the visitor economy.
- 6.13.3 In October 2022, ESC responded to the SeaLink non-statutory consultation expressing concern over the scheme's potential for negative socio-economic impacts affecting businesses, employment, and the wider economy. This is especially important regarding the potential for cumulative adverse socio-economic effects resulting from multiple energy infrastructure projects scheduled for development in East Suffolk over the next decade. This was echoed in the Statutory Consultation response also. ESC notes that concerns about the cumulative impact of multiple infrastructure projects in East Suffolk are seemingly being taken seriously by the Applicant, and that opportunities for the co-ordination of multiple infrastructure projects and the co-location of infrastructure elements are being explored.
- 6.13.4 However, ESC remains concerned about the potential for adverse socio-economic impacts on individual economic receptors, especially those located within and adjacent to the onshore Order Limits within Suffolk. ESC would expect to see that these impacts on individual receptors, including impacts on holiday rentals, tourist accommodation, farms and businesses directly affected by the changes, be appropriately mitigated and compensated where impacts are forecast.
- 6.13.5 ESC notes that spend by tourists and construction workers can be expected to be significantly different. The displacement of tourists by workers is therefore likely to significantly disrupt the local economy, with the high number of independent shops, cinemas, restaurants, museums etc. less likely to be accessed by workers than tourists. In order to mitigate this impact, NGET should work collaboratively with ESC and the host communities to assess these impacts and establish suitable strategies to encourage workers to spend locally.
- 6.13.6 ESC is concerned about the impact of the additions of Sundays and bank holidays to the core working hours in relation to socio-economic activity, specifically East Suffolk's tourism industry.

#### 6.14 Ecology

- 6.14.1 In reference to Breeding and Wintering Birds, the assessment of impacts in the Applicant's submission appears to be based on incomplete survey coverage which lowers the level of significance assigned to the impacts identified. In addition, mitigation measures (habitat creation – tree and hedgerow planting) proposed for breeding will only be of very limited value to most farmland bird species, again influencing the level of significance of the impacts identified on this receptor.

- 6.14.2 In reference to Hazel Dormouse, further survey work is needed to investigate potential presence of this species along part of the cable route. The absence of this means that the ES impact assessment conclusion cannot be relied upon.
- 6.14.3 In reference to Badgers and Other Mammals, 'Minor adverse, not significant impacts' are predicted on badgers and 'negligible impacts' predicted on other mammals (hedgehog and red deer).
- 6.14.4 In reference to Bats, concerns remain that equipment failure during surveys has limited the results collected and that in turn has resulted in the number of bat species and/or amount of bat activity being under recorded. This may have resulted in insufficient mitigation measures being identified and the significance of the impacts being underestimated.
- 6.14.5 In reference to Aquatic Macrophytes, it is unclear why these have been assigned 'District' importance in the ES when no notable or protected species were recorded?
- 6.14.6 In reference to Biodiversity Net Gain (BNG), although the legal BNG obligations for NSIPs are expected to be introduced in May 2026, the Applicant has stated in Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] that "National Grid's approach to BNG for NSIP projects is to:
  - meet the policy requirements within the current NPS;
  - deliver its corporate commitments to deliver at least 10% BNG with wider benefits;
  - maximise the benefits and value from consumer funded BNG; and
  - follow the spirit of the TCPA BNG legislation and guidance, including using the Statutory Biodiversity Metric."
- 6.14.7 National Grid also propose to deliver BNG both on-site and off-site, with off-site biodiversity net gain delivery including the purchase of biodiversity units from commercially registered providers. The Government is currently consulting on biodiversity net gain for nationally significant infrastructure projects.<sup>6</sup> This consultation details the Government's proposals to allow NSIP developers to deliver BNG on-site or off-site in the first instance, but the purchasing of statutory biodiversity credits is proposed to be permitted only as a last resort.
- 6.14.8 Whilst appreciating that legal BNG obligations have not yet been introduced for NSIPs, ESC wishes to emphasise the importance of BNG being delivered on-site wherever possible, and that where this is not possible, off-site but local BNG should be delivered, with biodiversity credits only purchased when on-site and off-site delivery options have been exhausted to the satisfaction of the Council.
- 6.14.9 In any case, ESC is of the view that more information is needed on how the project is going to achieve its minimum 10% Biodiversity Net Gain commitment in Suffolk, and how that is going to be secured and monitored in line with National Grid's commitment to managing and maintaining BNG for at least 30 years.

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<sup>6</sup> <https://consult.defra.gov.uk/biodiversity-net-gain/biodiversity-net-gain-for-nationally-significant-i/>



- 6.14.10 In reference to the Habitats Regulations Assessment (HRA), concerns remain about bird survey coverage and the impact that has on assessment of impacts, being of relevance to the HRA as well as the ES.
- 6.14.11 ESC notes the Government's plans, put forward in the Planning and Infrastructure Bill, to establish a Nature Restoration Fund as an alternative method for developers to deliver environmental mitigation. ESC wishes to emphasise that, if SeaLink were to be granted Development Consent by the Secretary of State, the delivery of environmental mitigation on-site is essential to properly mitigate impacts on the highly ecologically valuable and sensitive areas that will be damaged by the proposals.

## **7. Statement of Common Ground**

7.1 ESC (in coordination with SCC) wishes to highlight to the ExA that, as set out within Section 1.2.3 of the early draft Statement of Common Ground (SoCG) (Document 7.4.8 Draft Statement of Common Ground Between National Grid Electricity Transmission and East Suffolk Council and Suffolk County Council, [\[APP-329\]](#)) submitted with the application, the *'early draft SoCG has been prepared by National Grid to submit with the DCO application. It is based on engagement with ESC and SCC throughout the development of the Proposed Project. This early draft was sent to ESC and SCC on 3rd March 2025 and then an updated version was shared on 13 March 2025 for review and comment. ESC and SCC are currently reviewing this version of the SoCG and therefore comments from these parties were not included when this document was finalised for submission. This is due to the limited period between providing the draft version to ESC and SCC and the submission of the Application. The Parties aim to submit an agreed version of the SoCG at Deadline 1 of the Examination. National Grid will continue to work with ESC and SCC to resolve issues as the Proposed Project progresses through the Pre-Examination and Examination phases and will record those agreements in later versions of the SoCG'*.

## **8. ESC's forthcoming Local Impact Report**

8.1 This Relevant Representation presents a summary of the points which ESC considers to be the main issues and impacts. ESC is currently preparing a detailed Local Impact Report alongside this Relevant Representation, anticipated for submission in the early stages of the Examination.

8.2 The LIR will cover the materials discussed in this Relevant Representation, providing greater detail and commentary on topics as appropriate, including project coordination and co-location, together with a site-specific commentary on the various elements of the SeaLink project infrastructure proposed insofar as it impacts East Suffolk district, including but not limited to landfall, HVDC cable, Saxmundham converter station and River Fromus crossing, HVAC cable, Friston substation, construction and maintenance compounds etc.

8.3 It will also include a project-wide commentary focussed on thematic topic areas, for example, master planning and good design, landscape and arboriculture, ecology, biodiversity and BNG, design and heritage, environmental protection, coastal management, health and wellbeing, community benefits and compensation, socio-economics, leisure and tourism, and cumulative impacts.

## **Appendix A – Town and Parish Council Technical Engagement Meeting – 22<sup>nd</sup> May 2025**

Aim of meeting: The following section provides the ExA with a summary of discussion points from ESC's Town and Parish Council Technical Engagement Meeting held at the East Suffolk offices in Melton, Suffolk, on 22<sup>nd</sup> May 2025. The aim of the meeting was to engage with host Town and Parish councils to understand key concerns emerging related to the proposed SeaLink project. The below summary of matters discussed is not exhaustive but reflects the core points raised by Town and Parish representatives. Many of the points have an element of overlap with the points ESC have raised in this Relevant Representation. However, it is noted that Town and Parish representatives will be submitting their own representations for the SeaLink examination.

### Aldeburgh Town Council comments:

- Concerns over the cumulative impacts, especially with projects with overlapping timelines
- Uncertainty in worst case scenario (construction methods, timing).
- Accept impacts far greater for Friston, Saxmundham, Sternfield, Benhall and Kelsale as cable route not a permanent feature in the landscape like the converter station and substation
- But still impacts on Aldeburgh residents and visitors as they go through Saxmundham, Friston etc. to reach Aldeburgh
- Economic impact – both actual and perceived as all the construction will be visible on the routes to Aldeburgh
- Traffic impacts – people don't know which impact relates to which project
- Also looking at impacts in Walberswick etc due to further projects coming forward – we are at a crucial point now, so important to get it right
- Environmental impact on North Warren – RSPB Minsmere etc will hopefully pick that up
- The value of tourism in Aldeburgh and surrounding area was discussed - 75% of tourists are day visitors so traffic a key issue. Those who come for longer travel around the district – won't come back due to disruption.
- Very little space in between all projects which compounds matters

### Friston Parish Council comments:

- Concerns raised about road capacity, but junction capacity will also be an issue, even after Friday Street improvements – will be safer but lots of congestion. Traffic will therefore be displaced to rural road network so overall safety on a wider footprint will be worse.
- Noted the unfairness of the process with communities having to deal with multiple applications – possible overlap of Examination of Sea Link, statutory consultation for LionLink, and SPR post-consent discharges (design process for SPR substation). To suggest local people have capacity to engage with all of the projects is hard to comprehend.
- Friston Parish Council will be noting key quotes from ExA's report on EA1N/2 regarding the need for utmost care to be shown to the substation site, and the fact that SPR's mitigation was found to be only just sufficient.
- Overall, the schemes will lay waste to a large area of countryside – all the way from Friston to Saxmundham will be one big construction site - even temporary impacts are long term.
- Sea Link will not generate electricity, would be domestic so wouldn't increase energy security, and there is no evidence that it would lower energy bills. Friston Parish Council consider that National Grid is trying to fix its mistakes with regard to SPR projects connecting in this area – should have gone

to London and the southeast. All caused due to lack of investment over last 15 years - same impacts in energy sector as water sector with lack of investment in infrastructure.

- Noted agreement with concerns raised by Aldeburgh Town Council regarding cumulative impacts. Nautilus has not gone away (converter station site can take 3 projects, and all 3 will make connection at Friston – must refer to this and the project needs to be examined on this basis). Masterplan submitted by NGET is for 3 converter stations – either assess cumulatively or rule third one out. Should be putting all 3 cables in at same time if there are 3.
- Traffic assessment – saying the projects are sequential, but in reality won't run on-time so will inevitably overlap
- Advice Note 17 - projects that are reasonably foreseeable must be taken into account in Cumulative Effects Assessment. Can other projects be brought in on that basis?
- Health and wellbeing – serious issue and getting worse, regardless of what Environmental Statement says. Taking over people's lives.
- No local economic benefit, just a risk to key tourism industry.
- SPR already have consent for Friston connection hub. NGET alternative site selection for new connection at Friston is smoke and mirrors. As far as Suffolk is concerned, they have not fully considered alternatives.
- Flood risk at substation site – who is taking responsibility? NGET SuDS pond in same location as SPR SuDS pond - responsibility for flood risk is a mystery locally.
- SPR EA1N/EA2 haul road on substation site also - how it all fits in with NGET's plans is a mystery.
- Waste of time for ExA to examine the connection hub consent aspect of SeaLink, given SPR's imminent project start at Friston. SPR DCO should be the starting point for anything SeaLink propose. Should not dilute mitigation of existing project consents.
- Aldeburgh Town Council noted that if anything changes, it must be same or better.
- Friston Parish Council propose to raise the inefficient use of the Planning Inspectorate's capacity to examine this aspect again - it should be off the table for SeaLink examination. Should be on identical terms as SPR and their embedded mitigations.
- Concern about heritage – GIS connection hub at Friston may be expanded for Sea Link, LionLink and for third project? GIS will be taller – no detail on physical footprint of substation expansion.
  - Impact on listed buildings (Grade II\* listed church and Post Mill)
- Friston experiencing construction noise from EA2 which is within the scope of “best practicable means”, but Friston Parish Council doubt this - noise levels too high. Same concern for Sea Link and other projects coming forward.
- Connection hub's switchgear makes a very loud noise capable of waking residents at night – National Grid say it operates infrequently, but Friston Parish Council is concerned that this will become more regular considering the number of projects connecting into Friston
- Working hours – unacceptable, should be the working hours under SPR's consent as a maximum (noting that these are already very disruptive)
- Safety issue – substations catch fire, if converter station or substation catch fire could cause huge fire across wide area as sites surrounded by arable crops – does fire service have capacity to cope?
- Hearings need to be held locally

#### Saxmundham Town Council comments:

- National Grid only reviewed traffic impacts up to Farnham (no further north than Yoxford, not as far south as Woodbridge). Issue is they are not looking further than the Stratford St Andrew area. SCC

needs to ask NGET to extend further south down to Woodbridge to cover rat runs at Woodbridge, Snape.

- Concerns over potential for terrorism being drawn to area due to infrastructure being introduced within East Suffolk.
- Proximity of compounds to Saxmundham, S02 – 200m from one of the properties in Manor Gardens
- With proposed construction hours being 7 days a week, dust and noise will be a real concern. Needs to be a lot more work on dust suppression - insufficient mitigation proposed.
- Residual noise at night during operational stage is a real concern. Measurements taken while area has got hedgerows etc - for the same noise when on a flat ground, low frequency noises will travel much further. Intra-project effects due to noise, dust and working hours are a real concern. Concern to Hurts Hall also.
- Fromus bridge – protected views of Hurts Hall in Saxmundham Neighbourhood Plan
- Loss of reputation – known as a market town but will lose that, not a planning issue but Saxmundham Town Council will still raise this in their relevant representations
- Inter-project cumulative effects are also a significant concern
- If they strengthen Benhall Bridge, will have to put a temporary road closure on that – would create major disruption locally.
- Not happy with the Fromus crossing location - compounds near people's homes a real concern.
- 97% of NSIPs consented, only 4 refused – important to look at why these were refused

#### Benhall and Sternfield Parish Council comments:

- All well and good identifying transport issues, but realising meaningful mitigation impossible
- Junction from A12 to B1121 – not been properly addressed
- From A12 to Saxmundham, B1121 has 4 nasty turnings that need to be assessed and made safer (would be sensible mitigation)
- Noted that there is a primary school in Benhall
- Sternfield been completely sidelined, residents don't feel they have a voice and are not aware of what is happening.
- South side of converter station = road in Sternfield, converter station will be dominant in landscape, encroaching on an ancient hedgerow. Converter station been moved further south closer to Sternfield, 30 houses along road from Sternfield to Friston will have converter station in the view, 18 of which are listed.
- Drain alongside road from Sternfield to Friston (DRN175G0201) sits just south of attenuation ponds, have had problems with flooding in that drain – have concerns this will be made worse

#### Councillor for Kelsale and Yoxford Ward comments:

- Gets missed out but impacts will spread to Kelsale
- Heritage issues – old A12. 4 tributaries linking to the highway, getting traffic through the village already.
- Need to look at speed, capacity, safety, volume
- Bottleneck of the junction in Saxmundham – already difficult to traverse now.