



FAO Marie Shoesmith
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your ref: Sealink Scoping Res
Our ref: EN020026-000024-
221025
Date: 22 November 2022
Please ask for: Naomi Gould
Customer Services: 03330 162 000
Direct dial: 01394 444535
Email: naomi.gould@eastsuffolk.gov.uk

southeastanglia@planninginspectorate.gov.uk

Dear Marie Shoesmith,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Sea Link (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

East Suffolk Council (ESC) welcomes the opportunity to comment on the Sea Link Scoping Report dated October 2022. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008. The Council's detailed comments in relation to the Scoping Report can be found in Appendix 1 of this letter.

ESC would like to highlight that the Sea Link project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed¹, within the district. It is therefore essential that the project is not considered in isolation, and the full cumulative effects of Sea Link with other projects and proposals is adequately and appropriately assessed, mitigated and where appropriate compensated. In addition to the NSIPs that are

¹ Consented: Sizewell C New Nuclear Power Station, East Anglia One North, East Anglia Two and East Anglia Three Offshore Wind Farms

Proposed: Eurolink and Nautilus Multi-purpose Interconnectors, Sea Link Subsea Link, North Falls Offshore Windfarm, Five Estuaries Offshore Wind Farm

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

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

consented/proposed in the east Suffolk area, there are also several projects consented and proposed in the wider Suffolk and East Anglia region which also need to be considered in terms of the wider reaching impacts.

Since 2018, the Council has been engaging with the Government regarding the unstructured, non-collaborative approach to energy development. The Council 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 over-sight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation.

Notwithstanding the Council's overarching positions on the projects, ESC has previously requested National Grid comprehensively and robustly explore every opportunity for coordination of the Sea Link project with other proposed and consented projects at all stages of the development consent process. 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.

ESC welcomes the work the developer has undertaken in conjunction with National Grid Ventures to consider opportunities for coordination. This work needs to continue and extend beyond the consideration of co-location to ensure that genuine coordination at all stages of the process is secured.

If you have any questions regarding the detailed comments provided in Appendix 1, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a long horizontal flourish underneath.

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

Appendix 1 – ESC’s Detailed Comments on the Sea Link Scoping Report

1. Volume 1 Main Text – Part 1 Introduction

Need for the Project – 1.1.2

- 1.1. Paragraph 1.1.2.3 identifies the potential additional generation, interconnectors, and energy storage which could be expected to connect in the East of England Region by 2035, established by the National Grid Electricity System Operator in the Future Energy Scenarios. Further information and clarification is required on whether the need relates to the current projects with grid connection offers in the district, future anticipated connections, or both. It would be helpful to clearly understand, based on the current known projects, at what point the reinforcements proposed are required. Whilst it is stated that the project aims to be delivered by 2029/30, that could potentially be after East Anglia One North, Two, and Three offshore wind projects are delivered, although it would be in advance of the Sizewell C project. Given the increasing difficulties developers are having identifying deliverable landfall locations along the east Suffolk coastline, the lack of offshore wind farm leasing options in the region in Round 4, and now the potential option for the Nautilus project to connect to the Isle of Grain, if the degree of predicted generation, interconnection and storage in the region is not realised, would this change the need case for the project or the date by which it is necessary?

The Need for an Environmental Impact Assessment – 1.1.3

- 1.2. ESC agrees and supports National Grid and their commitment to undertake an Environment Impact Assessment.

Geographical Context – 1.1.4

- 1.3. If site 3 is selected following further detailed review of the site and design options, it is noted that the potential temporary access which would be required during construction to prevent vehicles travelling through Saxmundham, has not been included within the Suffolk Onshore Scheme Boundary. Given that it is known this temporary access would be required, this is considered an omission which should be addressed.
- 1.4. It is important that all temporary and permanent access arrangements are included within the Suffolk Onshore Scheme Boundary, including means of access for any early works in advance of formal commencement.

Net Gain Commitment – 1.1.8

- 1.5. National Grid has committed to a minimum of 10% Biodiversity Net Gain (BNG) across the project. Whilst this commitment is welcomed, as the project has two distinct geographic locations (Suffolk and Kent) it must be ensured that a minimum of 10% BNG is delivered in both areas. Delivery of greater BNG should not be proposed in one location at the expense of the other.

Key Legislation

- 1.6. ESC fully supports the Secretary of State's decision to issue a Direction that confirmed the project should be treated as a development for which a Development Consent Order (DCO) under the Planning Act 2008 is required. ESC requested that National Grid seek a Direction and provided a letter of support to be submitted with the application.
- 1.7. ESC notes the key legislation identified in section 1.2.2 and welcomes the recognition of the draft National Policy Statements EN-1 and EN-5, which ESC considers will be important and relevant, in addition to any further draft versions published.

Main Alternatives Considered – Section 1.3

- 1.8. The converter station site options areas are all identified on the basis that the infrastructure should be within a 5km radius of the network connection point (paragraph 1.3.4.16). The connection sites explored were at Sizewell, the proposed Friston substation, and a new connection location on the existing 400kV overhead lines. Connection at the proposed Friston substation was identified as the Sizewell options were considered too constrained and '*connecting into a new connection point in the area, with an associated additional substation, was not preferred*'. This however does not consider that the proposed Friston substation is subject to two legal challenges, the outcomes of which are not yet known. If for example, the East Anglia One North and East Anglia Two DCOs are quashed, the Friston site would also comprise 'a new connection point in the area' and therefore be considered in the same light as new connection points elsewhere.
- 1.9. It is essential that National Grid commits to further consideration of their site options assessment following the High Court's decision on the Judicial Reviews, and dependent on the outcomes, this may require the assessment to be retaken. Without this commitment, the requirement to consider alternatives would be based on incorrect assumptions regarding the proposed Friston connection site.

Stakeholder Engagement

- 1.10. ESC welcomes the additional work National Grid has undertaken to consider the concept of co-location of converter stations, shared cable corridors, and consolidation of landfalls (paragraph 1.3.4.67). ESC comments stated above similarly apply to the work undertaken; the site options considered for co-location are based on the assumption that the Nautilus and Eurolink projects are connecting to the grid at the proposed Friston substation. As the outcome of the legal challenges is not yet known, this work will need to be revisited and potentially re-assessed, dependent on the decision from the High Court.
- 1.11. ESC would like to emphasise that we requested all opportunities for coordination be explored during all phases of the development, both pre and post consent. This will extend beyond just co-location opportunities, although this is a fundamental consideration.

Project Description – Section 1.4

- 1.12. Paragraph 1.4.2.4 states that the proposed works at the Friston substation would comprise the installation of one Air Insulated Switchgear (AIS) bay, alternatively paragraph 1.4.2.5 states that if the Friston substation consented under the East Anglia One North and East Anglia Two offshore windfarms does not come forward, a new AIS substation would be constructed. The comments made above regarding the Judicial Reviews on the East Anglia One North and East Anglia Two DCOs apply, and therefore the project description in paragraph 1.4.2.5 may need to be revisited subject to the High Court's decision.
- 1.13. If the High Court's decision is found in favour of the Secretary of State, or the decision does not affect the consented DCOs under which the proposed Friston substation is granted, it is considered that the project description should include the option to deliver an AIS or Gas Insulated Switchgear (GIS) extension/bay or new substation. The East Anglia One North and East Anglia Two DCOs included the option of delivering a GIS or AIS National Grid substation. It has not yet been confirmed publicly what technology the proposed Friston substation will utilise and therefore it would be appropriate to ensure both options remain available.
- 1.14. The inclusion of this flexibility is considered especially important with the potential development of GIS substations which are not reliant on sulphur hexafluoride (SF₆). The assessment should include consideration of the use of GIS technology to reduce the footprint of the infrastructure.

- 1.15. Whilst it is appropriate that the assessment takes account of whether the proposed Friston substation comes forward under the East Anglia One North and East Anglia Two DCOs or as a new substation proposed under this project, the assessment should include consideration of the use of GIS technology to reduce the footprint of the infrastructure.
- 1.16. The comments provided going forward within this document are made notwithstanding the comments regarding the proposed Friston substation and the potential need for further consideration of the grid connection location and site selection options following the outcome of the Judicial Reviews, which will continue to apply.
- 1.17. Table 1.4.1 provides a summary of the typical characteristics of High Voltage Alternating Current (HVAC) cables in Suffolk. The Council welcomes the inclusion within the assessment of the provision of up to 12 ducts. Coordination of the corridors and cabling works for the HVAC cables between the converter station site and National Grid substation is essential. It would be helpful if details were provided as to the typical characteristics of a coordinated HVAC cable corridor above just that of the potential width.
- 1.18. Paragraph 1.4.2.10 states that the proposed converter station would be up to 10 hectares and 30m in height. ESC would like to take the opportunity to highlight that comprehensive and detailed justification will be required as to why the converter station for the proposed project is required to be this size when other similar converter stations for other projects are lower and occupy approximately half the footprint. Similarly robust justification will be required as to why the cable corridor for the project alone HVAC cabling needs to be 60m, ESC has experience of the East Anglia One North and East Anglia Two projects which proposed corridors widths of around half the width proposed by the Sea Link project.
- 1.19. ESC notes Table 1.4.2 provides details of the typical characteristics of HVDC underground cabling for Suffolk and welcomes the commitment in paragraph 1.4.2.13 to explore the ability to install cable ducts for other projects. Details of the characteristics of the coordinated HVDC cabling options would be welcomed. Also, similarly to the HVAC cabling, robust justification needs to be provided for the proposed cabling widths and why they cannot be reduced.

Construction – 1.4.3

- 1.20. ESC notes Table 1.4.5 provides an indicative construction programme for the Project based on the premise that the proposed Friston substation is constructed under the East Anglia One North and East Anglia Two DCOs. This identifies that construction could begin in 2026 and continue into 2030. The construction works could therefore coincide with the

construction works associated with several other consented and proposed NSIPs. The full cumulative impacts of the potential simultaneous or sequential construction programmes on the environment and local community needs to be carefully and robustly assessed.

- 1.21. ESC notes peak workforce is anticipated to be 300-400 across the project.
- 1.22. The enabling works and access and site preparation works identified within paragraphs 1.4.3.5 to 1.4.3.11 are noted. Given that enabling works are often sought to be undertaken pre-commencement, ESC would like to highlight at this early stage that the local authority is likely to require appropriate management of these works through a separate management plan, if the main management plans are not triggered until commencement.
- 1.23. Paragraph 1.4.3.9 discusses possible reuse of aggregate; in addition to removal of the aggregate to an appropriate facility, consideration should also be given to retention or reuse by another project in the locality.
- 1.24. ESC's comments in paragraphs 1.13 to 1.16 apply to paragraph 1.4.3.12 which describes the proposed Friston substation construction works.
- 1.25. Paragraph 1.4.3.15 states that the construction of a new National Grid substation at Friston would take approximately 18-24 months. It was understood under the East Anglia One North and East Anglia Two applications that this work could be spread over a four-year period due to the need to time the works with outages. ESC would welcome confirmation and clarification if there has been further refinement of the construction timescales since the granting of the East Anglia One North and Two DCOs.
- 1.26. Paragraph 1.4.3.29 states that the proposed HVAC and HVDC cables will typically be undertaken in an 80m and 40m wide working width respectively. ESC requires the minimal working width necessary to reduce the impact on the environment and local communities. Justification will be necessary to address to why 80m and 40m working widths are necessary when similar projects have demonstrated that they can achieve much narrower working widths. ESC also requests, as previously stated, that all opportunities for coordination are explored which includes consideration of the relative timings of the projects i.e., simultaneously or consecutively, and the potential for shared or coordinated cable corridors to reduce the impacts caused during construction.
- 1.27. Paragraph 1.4.3.46 confirms that no decision has yet been reached as to whether the landfall will be constructed using trenched or trenchless techniques. ESC supports further

investigations into trenchless techniques to reduce the impacts on the coastal environment and designated habitats.

Decommissioning – 1.4.6

- 1.28. Decommissioning of the proposed Friston substation (paragraph 1.4.6.1), dependent on the number of connections, could become quite complex and requires careful consideration of any decommissioning plans.
- 1.29. Further clarification is necessary to understand the relationships between the relative lifespans of the National Grid substation in comparison to the converter station. Paragraph 1.4.6.2 states that refurbishment and plant replacement could extend the life of the converter station beyond 40 years, whilst the lifespan of the National Grid substation is stated to be 40 years only. In addition to this, how will decommissioning of the National Grid substation also be managed when it connects multiple projects to the grid and is therefore subject to multiple DCOs.
- 1.30. Paragraphs 1.4.6.5 and 1.4.6.6 refer to different methods to decommission the onshore cables and marine cables. Full consideration of the impacts of the different techniques is required.

EIA Approach and Methodology – Section 1.5

- 1.31. Paragraph 1.5.2.3 references the need to identify environmental effects and, if any, propose project specific mitigation measures to avoid, reduce, or offset adverse environmental effects. The means to prevent the effect should also be included in this hierarchy.
- 1.32. The need for the Rochdale Envelope approach ahead of detailed design of the project is noted and accepted (paragraph 1.5.2.5). Whilst this is accepted to ensure a realistic ‘worst case’ assessment, it is essential that there is a commitment from the developer that all reasonable efforts will be made post consent to seek reductions in the parameters set on the ‘worst case’ basis. The developer should seek to achieve the delivery of a ‘best-case’ project to reduce the actual impacts of the project.
- 1.33. Further clarification will be required in relation to the definition of temporary and permanent effects provided in paragraph 1.5.3.7. Whilst there are some effects that will cease when the activity or work is stopped or removed, the activity will occur over such an extended period of time that they should be considered permanent in assessment terms.

- 1.34. ESC notes that major and moderate effects are typically considered to be significant in EIA terms whilst minor and negligible effects are not significant (paragraph 1.5.4.12). ESC welcomes the acknowledgement that when intra-project cumulative effects are taken into consideration, individual not-significant impacts could become significant when their interrelationship is assessed (paragraph 1.5.5.3).
- 1.35. ESC notes the approach to be taken to assessing inter-project cumulative effects. Whilst the approach to the Zone of Influence (ZOI) is noted, this is reliant on the original area within which potential effects of the project will occur being accurately set. Further comments on this will be provided within the topic specific sections of this response.
- 1.36. ESC has noted some errors and points of clarification in Appendix 1.5.A which have been outlined below. It would also be helpful in the future if the lists relevant to the Suffolk and Kent onshore areas could be more clearly separated.
- The distance identified between the East Anglia Two project and the Sea Link Suffolk Scoping boundary states 1.62km, this is incorrect as the two areas overlaps at specific locations, this also conflicts with the distance identified for East Anglia One North.
 - The East Anglia One North project has been incorrectly identified as not being within the Suffolk Onshore Scheme ZOI.
 - The distance between the Nautilus project and Suffolk Scoping boundary is 0.66km, again given the same connection location has been identified for both projects this needs clarification and amending.
 - It is noted that Brightwell Lakes (DC/18/4644/VOC, DC/17/1435/OUT, DC/18/2774/ARM) has been scoped out of the cumulative assessment as the development is outside the ZOI. Dependent on where the construction vehicles for the Sea Link project originate from, there could be cumulative impacts on shared junctions on the A12 and therefore further consideration should be given to this project.

2. Volume 1 Main Text – Part 2 Suffolk Onshore Scheme

Evolution of the Suffolk Onshore Scheme 2.1

- 2.1. As stated in paragraphs 1.9 and 1.10 of this response, the identification of the proposed Friston substation as the preferred grid connection location does not take into consideration the existing Judicial Reviews and their outcomes. The network connection point will need to be reviewed considering the High Court decision and any subsequent

decision made in the higher-level courts, should the matter be progressed. The converter station option areas were identified based on the grid connection at the proposed Friston substation, and therefore the siting options will need to similarly be reviewed and potentially a new siting and routeing options assessment undertaken dependent on the outcome of the legal challenge.

- 2.2. ESC fully supports the undergrounding of the HVAC and HVDC cabling which is committed to in paragraph 2.1.5.21.
- 2.3. ESC welcomes the work that the developer has undertaken with National Grid Ventures to explore opportunities for coordination in terms of the converter site, landfalls, and terrestrial cable corridors.
- 2.4. Paragraph 2.1.9.1 does not include the connection infrastructure required for the development in the form of extensions to the proposed Friston substation or the potential construction of a new substation. The project description does not refer to the potential to lay ducting for future projects which was referenced in paragraphs 1.4.2.8 and 1.4.2.13.

Landscape and Visual 2.2

- 2.5. The Scoping Report makes appropriate reference to relevant landscape related policy both at National level and District Council level (paragraphs 2.2.2.3 to 2.2.2.13). It is noted and accepted that the District Council's Settlement Sensitivity Assessments should be discounted because of their specific reference to housing and commercial development scenarios with no accommodation for energy related projects of the type under consideration (paragraph 2.2.2.11).
- 2.6. Due reference is also made to Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) planning practice guidance documents (paragraph 2.2.2.12), the AONB boundary line, the presence of Tree Preservation Orders, and Ancient Woodlands (paragraph 2.2.4.6). Other designations are also considered but scoped out of the Landscape and Visual Impact Assessment (LVIA) as not being of specific landscape relevance in respect of this assessment (paragraph 2.2.4.9). These assumptions are noted and understood.
- 2.7. The full suite of landscape character assessments from National level to District level is listed as part of the assessment, together with the relevant Seascape Character Assessments; also noted and accepted (paragraphs 2.2.4.12 to 2.2.4.17).

- 2.8. In addition to the seascape character documents identified, the developer should note and include reference to the Suffolk, South Norfolk, and North Essex Seascape Character Assessment ([LDA Report Template \(suffolklandscape.org.uk\)](https://suffolklandscape.org.uk)).
- 2.9. The scope of the visual impact assessment in terms of potential receptors is comprehensive and noted (paragraph 2.2.4.20).
- 2.10. The initial locations of representative viewpoints for the converter sites are shown in Figures 2.2.9 and 2.2.10 are noted but it is recommended that final positions are micro-sited on site to ensure that the given view is a genuine representation of the locality and not unnecessarily reliant on minor instances of screening vegetation that are not generally typical of the locality. Similarly, the limitations of using Zone of Theoretical Visibility (ZTV) for locating viewpoints should be understood and final positioning should be determined by on-site observation. ESC would therefore reserve the right to request the inclusion of additional or revised viewpoints.
- 2.11. The Council is concerned that Figures 2.2.9 and 2.2.10 show that same viewpoints for both Converter Station option sites plus their respective cable route options. This seems to suggest that viewpoint options for each alternative were compromised to achieve this uniformity across both main alternatives. The Council advises that this combined suite of viewpoints be reviewed to ensure that they have specific relevance to each project and that additional ones be added where it is apparent that there may be gaps in the informative.
- 2.12. None of the viewpoints relate to the grid connection works proposed. ESC recommends that the site of the proposed Friston substation is appropriately assessed, and viewpoints included for this purpose.
- 2.13. In addition to the representative viewpoints, the Council expects the inclusion of illustrative viewpoints including both photomontages and wireframes in order to demonstrate the widest understanding and depiction of the projects, not least of all for improved public understanding of what is being presented. Further, if new landscape planting is being relied on in mitigation for significantly adverse effects, this should be realistically shown in viewpoint illustrations. For the avoidance of doubt, anticipated growth rates of any new planting that is relied on to mitigate significantly adverse effects should be discussed and agreed with the Council prior to being depicted in illustrations.

Visualisations

- 2.14. The principle of visualisations being based on maximum development parameters is noted and accepted (paragraph 2.2.4.31). The inclusion of any proposed mitigation planting must be realistic to ensure that the effectiveness of this planting is represented as accurately as possible. It is therefore requested that the growth rates for the planting are agreed with ESC prior to the preparation of the visualisations.
- 2.15. It is not accepted as stated in paragraph 2.2.4.32 that the extensions to the National Grid substation are minor, especially when considered cumulatively with the development consented under the East Anglia One North and East Anglia Two DCOs. Volume 1 of the Scoping Report also discussed the possibility, should the proposed Friston substation not come forward, for the application to include a new National Grid substation in this location. Appropriate visualisations should therefore be prepared to consider the landscape and visual impacts at this site.

Embedded and Control & Management Measures – 2.2.5

- 2.16. The consideration of embedded and control and management measures in respect of potential mitigation provision is noted. Where reliance is placed on new planting to restore lost landscape fabric or to achieve screening benefit, full acknowledgement will need to be given to the potential limitations of achieving successful new planting in East Anglia given the recent trend for prolonged rainless periods of weather in the critical spring and early summer period. Such risks to successful plant establishment will need to be fully acknowledged and accounted for in planting strategies and specifications.
- 2.17. The outline control measures for protecting landscape features during construction are noted as the basis for further discussions. In paragraph 2.2.5.4 it is stated that a five-year aftercare period will be established for all reinstatement and mitigation planting. Whilst it is accepted that this may be an appropriate period for the hedgerow planting, a longer period is considered necessary to ensure the successful establishment of the landscaping which is likely to be necessary around the converter station sites and potentially proposed Friston substation. Due to the risks to successful planting establishment described above, ESC wishes to highlight the need to consider adaptive management measures.
- 2.18. It should be noted that all important hedgerows within the onshore area should be identified in accordance with the Hedgerow Regulations 1997.

2.19. In respect of potential impacts outlined in Table 2.2.6, the Council has some concerns regarding the following assumptions:

- *Operational lighting at converter stations* - This has been scoped out as being of limited potential for significant effects partly because of the context of existing settlements. This does not seem to be a safe assumption given the relatively isolated location of potential converter station sites away from existing settlements. This assumption will need further justification.
- *Operational extension to the proposed Friston substation* – This has been scoped out as it is considered there is less potential that significant effects will result on the landscape character or visual amenity. The Examining Authority took a different view when considering extensions to the proposed Friston substation in relation to the Nautilus and Eurolink projects during the East Anglia One North and East Anglia Two examinations. The Examining Authority’s conclusions taken from the Secretary of State’s letter (paragraph 5.21) are set out below:

‘The extension of National Grid Substation Appraisal demonstrated a significant worsening of potential adverse effects for relevant VPs and for landscape character. The extension of the National Grid substation would intensify and worsen the effects of the Proposed Development on both the local landscape and on visual receptors.’

There is also no consideration of the potential need for a new substation to be constructed should the proposed Friston substation not come forward under separate DCOs. It is essential that the cumulative impacts of the project with the consented East Anglia One North and East Anglia Two projects and proposed Nautilus and EuroLink Multi-purpose Interconnectors are understood and assessed ensuring that any further mitigation required is delivered. The scoping out of the impacts of the connection works is not accepted or considered justified.

2.20. The described Landscape and Visual Impact Assessment methodology is accepted. It would however be helpful to include a definition of short, medium, and long term.

2.21. A construction and operational lighting plan should be developed to consider, manage and mitigate the impact from temporary and fixed lighting associated with the construction and operation of the infrastructure.

Ecology and Biodiversity – 2.3

- 2.22. ESC broadly agrees with the scope of the ecological assessments to be included within the EIA. The Council does however have some comments on the detail of some of the ecological receptors and proposed assessments identified within the Scoping Report which will need to be addressed in the assessments.
- 2.23. Paragraph 2.3.2.5 and 2.3.2.6 reference Biodiversity Net Gain and the Council's previous comments in paragraph 1.6 of this response apply.

Statutory Designated Sites

- 2.24. It appears that there may be statutory designated sites missing from the list of those identified in Table 2.3.1, for example Snape Warren Site of Special Scientific Interest (SSSI) does not appear to be listed despite being within 5km of the Suffolk Onshore Scheme area. It should also be noted that The Haven, Aldeburgh is a Local Nature Reserve (LNR) not a National Nature Reserve (NNR) as referenced in Table 2.3.1.
- 2.25. Also, please ensure that all interest features of the identified designated sites are considered as part of the assessment. For example, section 2.3.4.26 identifies that the Outer Thames Estuary Special Protection Area (SPA) is designated for wintering red-throated diver (*Gavia stellata*), whilst this is correct the SPA is also designated for breeding common tern (*Sterna hirundo*) and little tern (*Sternula albifrons*) which must be included as part of the assessment.

Non-statutory Designated Sites

- 2.26. It is noted that data on County Wildlife Sites (CWSs) and Roadside Nature Reserves (RNRs) is still being collected from Suffolk Biodiversity Information Service (SBIS), it must be ensured that this information is incorporated into the scoping considerations set out in Tables 2.3.4 to 2.3.8 so that potential impacts on such sites are fully assessed.

Protected Species (Surveys)

- 2.27. Bats - Section 2.3.4.34 identifies that bat activity surveys will be undertaken on all habitats where permanent infrastructure will be built along the route. It is considered that such surveys must also be undertaken on all habitats which will be temporarily impacted by the proposed development as well, as such construction can result in temporary impacts which occur for relatively long periods of time (such as hedgerow removal and replanting as part of cable installation).

2.28. Hazel Dormouse – Whilst hazel dormouse is included as a consideration within Tables 2.3.4 to 2.3.8, they are not listed as a species to be surveyed for in section 2.3.4.3. It is noted that the consideration of this species in section 2.3.4.35 states that no records of this species were returned from the desk study area, however a record does exist from approximately 1km to the west of the Suffolk Onshore Scheme Scoping Area Boundary (Figure 1.1.2 Rev 6 in Volume 3) and therefore it is considered that surveys for this species should be undertaken where suitable habitat is present and likely to be impacted by the proposed development.

Survey Methodologies

2.29. All ecological surveys must be undertaken by suitably qualified ecologists following published best practice guidelines. Survey methodologies, coverage, and locations should be agreed with the Local Planning Authority prior to survey work commencing.

Potential for Significant Effects

2.30. Clarification is required as to why Tables 2.3.4 to 2.3.8 do not scope in protected and notable species as receptors for the permanent habitat loss (terrestrial) impact pathway. Given the number of options currently included, it appears that permanent habitat loss which impacts on protected and notable species could occur as part of the development and therefore this must be included as part of the assessment.

Cultural Heritage – 2.4

2.31. Paragraph 2.4.2.3 identifies the Local Policy Framework applicable to the consideration of heritage assets. Whilst the reference to the East Suffolk Council Local Plan is correct, the policies identified are not current. The relevant policies have been listed below:

- Policy SCLP10.4: Landscape Character
- Policy SCLP11.1: Design Quality
- Policy SCLP11.3: Historic Environment
- Policy SCLP11.4: Listed Buildings
- Policy SCLP11.5: Conservation Areas
- Policy SCLP11.6 Non-Designated Heritage Assets
- Policy SCLP11.7: Archaeology
- Policy SCLP11.8: Parks and Gardens of Historic Landscape Interest

2.32. ESC notes the 1km buffer boundary identified on Figure 2.4.1 and the heritage assets identified within this area listed within Appendix 2.4.A. There are however some assets

which have not been included within the tables which ESC considers should have been. These have been listed below:

- The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building)
- Ogilvie Homes, Leiston Road, Aldringham (Grade II Listed Building)
- Southview, Mill Lane, Aldringham (Grade II Listed Building)
- The Ogilvie Almshouses, Church Lane, Aldringham (Grade II Listed Building)
- Church of St. Andrew, Church Lane, Aldringham (Grade II Listed Building)
- The Pantiles, Aldringham (Grade II Listed Building)
- The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building)
- 24 Westward-Ho, Leiston The Watch-House, Sizewell Gap, Leiston (Grade II Listed Building)
- Fisher's Farmhouse, Abbey Lane, Leiston (Grade II Listed Building)
- Retreat House, Abbey Road, Leiston (Grade II Listed Building)
- Barn at Abbey Farm, Abbey Road, Leiston (Grade II Listed Building)
- The Guesten Hall at Abbey Farm, Abbey Road, Leiston (Grade II Listed Building)
- Moat Farmhouse, Moat Road, Theberton (Grade II Listed Building)
- Peakhill Cottages, Theberton Road, Kelsale (Grade II Listed Building)
- Elm Tree Farmhouse, Aldeburgh Road, Aldringham (Grade II Listed Building)

2.33. Although Conservation Areas have been identified within the criteria for assessing the value of heritage assets – Table 2.4.7 and mentioned briefly in paragraph 2.4.4.5, the potentially affected Conservation Areas have not been specifically identified within the Scoping Report. ESC wishes to highlight that it will be expected that Conservation Areas are considered within the assessment, specifically Saxmundham, Aldeburgh and Thorpeness Conservation Areas.

2.34. The sources of construction impacts are noted in paragraphs 2.4.6.5 and 2.4.6.6 which include both the converter station and substation impacts on the setting of heritage assets. Paragraph 2.4.6.7 identifies the sources of operational impacts and whilst the new converter station is highlighted, the extension to the proposed Friston substation is not, nor is the possibility of a new substation referenced. Table 2.4.1 however confirms that the converter and substation infrastructure has been scoped in. Consideration should also be given to the need for a new substation, should this be necessary.

2.35. Direct and indirect impacts through the alteration of the historic landscape should also be considered and scoped in. There is a significant amount of information available in relation to the historic landscape character of the Friston substation site submitted as part of the East Anglia One North and East Anglia Two DCOs. Appendix 1 of the Council's joint Local Impact Report written in relation to the East Anglia One North and East Anglia

Two projects provides an assessment of the historic landscape of Friston and Knodishall ([EN010077-002772-DL1 - Suffolk County Council - LIR.pdf \(planninginspectorate.gov.uk\)](#)). Whilst paragraph 1.4.A.3.2 in the Appendices has been noted. ESC requests that known non-designated assets not yet on the HER should be considered within the assessment.

- 2.36. ESC would also like to highlight Sloe Lane and Nuttery Lane, whilst also not recorded on the HER these are historic roads, the impact of the proposals on these assets should be considered.

Water Environment – 2.5

- 2.37. ESC will primarily defer to the Lead Local Flood Authority and the Environment Agency for their technical review of this section of the Scoping Report. The Council would however like to take the opportunity to highlight the importance of adequately and robustly assessing flood risk from all forms of flooding including surface water flooding. Reviewing the converter station sites on the Environment Agency's surface water flood map identifies several flow water paths which could be affected by the project.
- 2.38. In relation to the grid connection location, there is a significant amount of published material available on the Planning Inspectorate's website submitted as part of the East Anglia One North and East Anglia Two DCO examinations. Friston village has been subject to surface water flooding on a number of 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. Dependent on whether the Sea Link project seeks extensions to the proposed Friston substation or proposes a new substation, there is potential for the development to interact with the flow paths identified by the SWMP.
- 2.39. 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. It is essential the full cumulative impacts of the developments are carefully assessed and fully understood.
- 2.40. The Council notes that the operational impacts of the projects have been scoped out of the assessment. This is not supported or considered to have been sufficiently justified within the Scoping Report. Operational impacts associated with the projects should be scoped in.

Geology and Hydrology – 2.6

- 2.41. ESC will primarily defer to the Environment Agency for their technical comments on this section of the Scoping Report in relation to groundwater matters.
- 2.42. 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.
- 2.43. The developer should also develop a robust discovery strategy to cover the eventuality that unexpected contamination is encountered and appropriately addressed.
- 2.44. The developer should also take measures to identify Private Water Supplies in the vicinity of construction works so that they can be planned and undertaken in such a way as to prevent impact to those supplies.

Traffic and Transport – 2.8

- 2.45. Whilst ESC defers to SCC as the Local Highway Authority for their technical input on this section of the Scoping Report, ESC would like to make some high-level comments.
- 2.46. The commitment within paragraph 2.8.3.3 to review the proposed study area for traffic and transport identified in Figure 2.8.1 is welcomed. ESC would like to be included in these discussions given the Council's detailed knowledge of the district and the linkages with effects on air quality. At present it is considered that the study area is too narrowly defined and further consideration of junctions outside of this area will be necessary. For example, the study area does not extend to the A12 and therefore excludes the junctions between the A12 and A1094 and A12 and B1121. The Council would have expected to see the transport impact modelled as far westward as, and including, the A12. It is also considered there is potentially the need to assess network locations beyond the point where the construction traffic would connect to the A12.
- 2.47. As previously identified, the site access to Site 3 has not been included within the Onshore Boundary which should be addressed.
- 2.48. The widening of the study area is considered particularly important due to the potential inter-project cumulative impacts during the construction phase of the project with consented and proposed NSIPs and other major projects. These impacts need to be

carefully considered and appropriately and adequately assessed and mitigated. Assessing the onshore study area only is considered inadequate.

Air Quality – 2.9

- 2.49. The developer has considered air quality in respect of vehicle emission issues locally and dust in respect of construction activities.
- 2.50. In respect of dust, the Outline Code of Construction Practice (OCoCP) includes dust in respect of the Construction Environmental Management Plan (CEMP). ESC would welcome inputting into this document. Given the soil conditions in the local area, it is likely dust could be a significant issue and so consideration should be given to Dust Management Plans to ensure that mitigation is designed and deployed appropriately, and these should be approved by the local planning authority.
- 2.51. The developer has stated that a detailed assessment of vehicle emissions is to be scoped out as traffic flows are expected to be below the Institute of Air Quality Management (IAQM) screening criteria but goes on to say that they do not yet know vehicle numbers (Section 2.9.3). As it is an unknown quantity this should remain scoped in. Furthermore, HGV and vehicle numbers are a sensitive issue in respect of cumulative impacts with other projects and so consideration should be given to detailed assessment in respect of that cumulative impact.
- 2.52. The developer has stated that Euro 6 will be the standard for HGVs (paragraph 2.9.5.3), which is welcomed, along with the Construction Traffic Management Plan (CTMP) providing for GPS monitoring of HGVs and the use of authorised construction routes (paragraph 2.8.5.6).
- 2.53. The developer has stated the Suffolk scoping boundary is outside or not close to the Air Quality Management Area (AQMA). This may be the case, but construction related traffic has the potential to cause impact further afield than that assessed, especially if traffic travels through the AQMA at Stratford St Andrew. ESC suggests a wider scoping boundary should be considered, as previously highlighted in this response, to include impacts on the wider road network and potential impacts on junctions, considering cumulative effects with other developments.
- 2.54. It is stated that emissions from Non-Road Mobile Machinery (NRMM) should be scoped out due to the transient nature and incorporation of “best practice measures”. This is premature as there is not yet sufficient detail to state that emissions from NRMM will not be an issue and this will need to be considered further.

Noise and Vibration – 2.10

- 2.55. ESC considers that the developer has broadly considered the relevant areas in terms of noise and vibration impact, however further surveys are required moving forward and there is an expectation that the developer will design and manage this project with the minimisation and mitigation of noise and vibration impacts in mind.

Construction Noise and Vibration

- 2.56. The proposed study area of 300m from construction areas is accepted (2.10.3.2), although this will not prejudice complaints from noise sensitive receptors from further afield in the event the project is consented and implemented.
- 2.57. The developer has stated that BS5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Noise and BS 5228-2:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Vibration (BS5228), and specifically the “ABC” methodology of those standards, are to be used in relation to impact from construction noise and vibration. This is accepted as suitable (paragraph 2.10.3.2).
- 2.58. The developer had committed to Best Practicable Means (BPM), as defined in the Control of Pollution Act 1974 and expanded upon in BS5228: 2009+A1: 2014, in respect of site operations and mitigation for noise and vibration and this is welcomed. It is important that all relevant sections of BS5228 are considered and implemented, including section 8 – Control of Noise.
- 2.59. The developer has provided an OCoCP which includes noise and vibration management as is expected for this type of development and should be secured in a requirement in terms of compliance. The OCoCP provides a relatively high-level view of noise and vibration management and mitigation and commits for CEMPs to provide the detail in respect of specific works. The local planning authority should have some input into construction activities in terms of mitigation and monitoring for noise and vibration and therefore should be included in approving the CEMPs, if this is not possible and that position is justified there may be a need for a more detailed Noise Management Plan (NMP) as an appendix to the CoCP and consideration of adopting a Control of Pollution Act 1974 Section 61 approvals process.
- 2.60. The developer should produce a detailed complaints and monitoring plan including when and how they intend to inform the local planning authority, this should form part of the OCoCP, CEMP, NMP, S.61 as appropriate.

- 2.61. The developer has considered noise and vibration from construction traffic, it is assumed this is in respect of highway noise and vibration which is a Highways Authority matter, and that site construction traffic noise and vibration will be considered in respect of the overarching construction noise and vibration requirements under BS5228 and in the OCoCP.
- 2.62. The developer has ascribed significance in respect of construction noise and vibration, and this should be in line with the BS5228 “ABC” methodology as proposed.

Operational Noise and Vibration

- 2.63. The proposed study area of 1000m from the proposed substation sites and the Friston site is accepted, along with the developer’s emphasis on closer proximity Noise Sensitive Receptors (paragraph 2.10.3.5). In respect to location, the developer is advised that the proposed Friston substation is included in the East Anglia One North and East Anglia Two rating level for the site and as such this is a site wide constraint that they will have to meet.
- 2.64. The developer has proposed BS 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound (BS4142) in respect of operational noise assessment, and this is accepted (paragraph 2.10.7.14). The developer has also stated that the DCO will contain a requirement with an appropriate noise level, and this will need to be determined as a rating level using BS4142 in order to take account of any acoustic character to sound emissions and importantly to take account of the local context.
- 2.65. In respect of that context, the developer has correctly stated that the majority of the area is quiet, rural, and residential in nature. Therefore, there is potential for the introduction of a 24 hour a day 7 days a week industrial noise source to have significant adverse impact, and this is to be avoided, along with adverse impact mitigated and minimised in line with NPS EN-1 and the Noise Policy Statement for England.
- 2.66. The developer is also required to consider cumulative effects with other committed or consented major projects, principally, but not necessarily limited to, Sizewell C, East Anglia One North and East Anglia Two, as well as other proposed major projects such as Eurolink and Nautilus where there is information available to consider. “Noise creep” is a significant issue with the number of projects both planned and consented and needs to be considered, minimised, and where possible prevented entirely.

2.67. The developer ascribes significance criteria to operational noise in line with NPS EN-1 and states that a significant adverse effect is considered to occur at large or medium magnitudes of impact which Table 2.10.9 describes as a rating level between 5 and 9dB above background and more than 10dB above background respectively. As Significant Adverse Effects are to be avoided it is therefore assumed the developer is expecting to achieve 4dB above background or less as a rating level.

2.68. ESC's current stance 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 1990 applications but is equally relevant here and has been stated for other DCO projects we are involved with:

Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified.

2.69. Due to the size of this type of project, the 5dB below background is an aspirational target and one ESC asks developers 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. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration; in particular the requirement to mitigate and minimise noise impact although they appear very familiar with these principles which is comforting at this stage. Section 2.10.7.20 also implies that adverse effects will be avoided, and the rating level will be set below background so that the impact is negligible as is "standard practice", if this is the case it is to be welcomed.

2.70. The overall expectation for operational noise is that a robust assessment will be undertaken using BS4142, that an appropriate rating level will be proposed relative to an appropriate representative background sound level, and that it will inform design and mitigation so as to reduce noise impact to an absolute minimum. A requirement in the DCO will be needed, and dependent on the rating level that is proposed, there may be a need for a further requirement with a commitment to reduce that rating level further should it be possible to do so at a later detailed design and implementation stage. The

need to keep impact from operational noise to an absolute minimum cannot be understated and we will require robust justification in reaching agreement.

- 2.71. In terms of scoping, operational vibration has been scoped out and this is accepted, all areas that have been scoped in are agreed. The developer has however stated that noise from switchgear and emergency equipment such as generators and compressors should be scoped out, this is currently not agreed as it will be dependent on the likely frequency, duration, and mitigation for these events and therefore further justification should be provided.

Socio-economics, Recreation and Tourism – 2.11

Study Area

- 2.72. The scale of the scheme, as indicated in the Suffolk Onshore Scoping Boundary, shows that irrespective of the preferred route and locations for the project, a large swathe of east Suffolk will be affected, whether on a temporary or permanent basis.
- 2.73. In considering the Suffolk Onshore Scoping Boundary, ESC would like to ensure that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider district. The Council question whether the 500m and 1km assessment limits described are appropriate (paragraphs 2.11.3.4 and 2.11.3.5), particularly when considering the permanence of the converter station and substation, and the visual impact for example. It is therefore considered that greater distances should be considered. Consideration needs to be given to an assessment of this interdependency and the impacts (including reputational and perceptual impacts) beyond the Suffolk Onshore Scoping Boundary, and the current 500m and 1km assessment limits.
- 2.74. The visitor economy is one of largest economic sectors in east Suffolk and provides a good illustration of how the impact of the scheme extends beyond the boundary limits. There is a high degree of interdependency between visitor destinations, employment, and supply chains within east Suffolk.
- 2.75. A successful visitor economy in east Suffolk 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. Visitors move from destination to destination using the 'B' roads identified within the scoping boundary, employees need to access their employment, and the potential for the displacement of visitors during construction, should not be ignored.

2.76. ESC is concerned that disruption to the visitor experience will have a consequential impact on the perception of east Suffolk as a holiday destination and therefore negatively affect the visitor economy throughout the lifetime of the project.

Planning Policy

2.77. ESC has recently published two relevant economic strategies which should be considered within the assessment:

- East Suffolk Economic Strategy 2022 – 2027 ([Link](#))
- East Suffolk Visitor Economy Strategy 2022 – 2027 ([Link](#))

2.78. In addition, ESC has commissioned a Cultural Strategy which is due to be published in early 2023.

Baseline Conditions

2.79. The baseline assessments draw heavily on desk-based research and digital modelling for the identified receptors:

- Employment levels in East Suffolk
- Local economy within East Suffolk
- Users of public rights of way and recreational routes
- Local communities
- Residential properties
- Businesses
- Visitor attractions
- Development land

2.80. Whilst the identified receptors conform with expectations, ESC believes that there is a need for caution as an over reliance on desk-based research and digital modelling could present a 'two-dimensional' assessment of the baseline. Field assessments including visitor, business, and resident surveys should be conducted to establish a baseline for some of the more qualitative or intangible impacts of the scheme. Especially, the perception of business owners and visitors towards the scheme, the impact on the visitor experience and reputation throughout the project life cycle, and the impact on the movement of residents and visitors during the construction phase.

Potential for Significant Effects

- 2.81. The Council agrees with the identified sources and impacts that are likely to occur during the construction, operation, maintenance, and decommissioning of the project.
- 2.82. ESC agrees with the identified effects, and degree of effects, on the socio-economic, recreation, and tourism activities within east Suffolk. However, there needs to be additional consideration given to the combined or cumulative effect of other potential and confirmed construction projects such as Sizewell C, onshore infrastructure in support of the wind farms (East Anglia One North and East Anglia Two), and the proposed Eurolink and Nautilus projects. If the landfall at Aldeburgh is taken forward for Sea Link and the interconnectors and construction works overlap, there will be a significant concentration of construction work and associated vehicle movements in this honeypot location. If the timing of this work coincided with the peak tourist season, this would cause significant additional traffic pressures in the area. The resultant traffic pressure in addition to the disruption caused by the construction works could have significant impacts on local tourism. Consideration must be given to the timing of the works within the assessment. The implications of restricting the timings of the work would then need to be considered carefully within different topic areas of the EIA and balanced against any other associated impacts.

Effects - Construction, maintenance, and decommissioning

- 2.83. It is noted that the project will generate direct and indirect temporary employment, training, and apprenticeship opportunities, both on site and in the supply chain during the construction, maintenance, and decommissioning phases. 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.
- 2.84. It is agreed that the employment and wider economic activity created during the construction, maintenance and decommissioning phases will generate Gross Value Added (GVA) within the local East Suffolk economies. ESC would however need to be reassured that the additional GVA created through the scheme is not negated by adverse impacts on the wider economy. The Council also considers that the assessment should consider the net gain in GVA, and not only assess the direct and indirect contribution of the scheme but also examine any potentially negative impact on GVA within the wider economy.
- 2.85. It is noted that disruption to public rights of way network or other recreational routes during the construction maintenance and decommissioning phases would be avoided as far as possible. Where necessary, suitable diversions would be agreed with SCC. Whilst

diversions may be unavoidable, the impact of re-routing traffic, and potential delays needs to be explored, particularly regarding the impact on businesses, and the visitor experience.

- 2.86. ESC notes that a number of residential properties, local businesses, visitor attractions, community facilities, open spaces, and development land allocations have been identified within the study area which could be impacted by land take or amenity impacts. Any impacts should be temporary whenever possible and affected receptors should be suitably consulted and engaged with during the life cycle of the scheme.

Effects – Operation

- 2.87. The Scoping Report states that the scale of operational employment generated is likely to be very limited. The energy sector, both onshore and offshore, is a significant employer in East Suffolk, and the opportunities to attract the current and future workforce into high-skilled, high-value employment within the sector should be explored during the operational phase. The scale of operational employment generated is identified as likely to be very limited and therefore any effect on GVA will be small. However, the lasting impact on indirect employment and business vitality within other key sectors should be explored, ensuring that the scheme delivers a net gain in GVA during the lifetime of the project.

Proposed Assessment Methodology

- 2.88. ESC has commented on the data sources and requests that recent economic and tourism strategies are considered within the assessment. Consulting with local stakeholders is also important, providing additional qualitative dimension to the analysis. ESC strongly agrees that the assessment methodology should entail the following:

- *Assessment of the likely scale, permanence and significance of effects associated with socioeconomics, recreation & tourism receptors; and*
- *An assessment of the potential cumulative impacts with other projects within the surrounding area.*

- 2.89. ESC also agrees with the statement that the socioeconomics, recreation, and tourism effects of the scheme will be assessed on:

- *Consideration of sensitivity to impact... and that 'the assessment will need to take account of the qualitative sensitivity of each receptor and, in particular, their ability to respond to change based on recent rates of change and turnover (if appropriate); and*

- *Scale of impact: this entails consideration of the size of the impact on people or business in the context of the area in which effects will be experienced.*

Health and Wellbeing – 2.12

2.90. ESC refers back to comments made in previous sections of this response as this topic area is influenced by technical assessments made in a number of other chapters of the EIA. It is considered that flood risk should also be taken into account.

2.91. The developer will be aware that effective community engagement and complaint response (and where appropriate resolution) is a key part of all stages of large-scale projects, including Sea Link. The nature of community engagement by a developer can have a significant impact on the local communities' experiences. The project should have well developed community engagement and complaint procedures, the latter should include notification to the local planning authority within a reasonable time period.

Cumulative Effects – 2.13

2.92. The previous comments highlighted within this response which relate to cumulative effects are relevant to this chapter of the Scoping Report. Section 2.13.3 sets out the methodology to be used for inter-project cumulative effects. The commitment in paragraph 2.13.3.2 by the developer to regularly review and update the list is welcomed.

2.93. Further clarity is sought regarding the topics to be included within the inter-project cumulative assessment. Table 2.13.2 identified study areas for some environmental topics, not all the topics have however been included within the table. Further clarification is required as to whether if a study area has not been identified, this then scopes the matter out from consideration within the assessment? The Council would like to make it clear that all topic areas should be included within the inter-project cumulative assessment given the current proposals for co-location of infrastructure with the Nautilus and Eurolink projects, notwithstanding the recently consented NSIPs in the locality. The topic areas which currently appear to be missing from the assessment are socio-economic, recreation and tourism, and health and wellbeing. These should be included.

2.94. ESC considers that further justification is required for the ZOI identified. Previous comments within the topic specific sections of this response are applicable.

2.95. Paragraph 2.13.3.5 states a 20km ZOI will be utilised to establish the long list of developments. Whilst that may be appropriate for major planning applications it is

considered that a larger ZOI is utilised in relation to NSIPs due to their scale and associated impacts.

2.96. ESC considers that amendments are necessary to Table 2.13.3 in relation to the distances between the projects and Sea Link's Project Scoping Boundary, particularly in relation to those which would share a connection location under the current proposals. The table has omitted reference to East Anglia One North, although East Anglia Two has been included. As stated above, it is considered that this list should include NSIPs within a wider search area.

2.97. It is welcomed that the list of projects to be included within the cumulative assessment will be continually reviewed.

2.98. ESC wants to highlight within the section on cumulative effects that the grid connection site at Friston is subject of a masterplan. Any future connections or works at Friston will need to carefully consider the implications of the works on the masterplan for the site, in addition to carefully considering the in-combination effects of the proposals. It is essential that the developer understands the sensitivity of the connection site. In the Examiner's Report on East Anglia One North and East Anglia Two the Examining Authority observes:

'... that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.'

2.99. To accommodate additional extensions to the proposed Friston substation, not only was it acknowledged at the time of the examination that the landscape and visual effects would be intensified, but the development would also remove the land currently identified for a drainage basin. This would therefore require fundamental changes to the masterplan for the site.

3. Volume 1 Main Text – Part 4 Offshore Scheme

Physical Environment 4.2 - Coastal Management

3.1. The size of the site required for the permanent landfall take or during construction has not been specified further clarification on this is required. Table 2.2.6 identifies the sources and impacts; it is essential that an assessment of temporary and/or permanent 'coastal change' as a potential impact on the receptors at the landfall is included.

- 3.2. ESC would like to highlight that the Environment Agency has coastal management responsibility for the shoreline between Thorpeness and Aldeburgh and therefore must be included as a key consultee going forwards.
- 3.3. ESC wishes to raise in reference to paragraphs 4.2.4.1 and 4.2.4.2 that it will be important that National Grid provides a clear methodology as to how the baseline conditions will be surveyed and monitored, in addition to describing how project-induced deviation from the baseline will be ascertained.
- 3.4. The Environment Agency guidance referenced in paragraph 4.2.4.12 seems ubiquitous across the UK, rather than specific to the East Anglian coast. ESC requires the application of site-specific data rather than generic figures within the assessment.
- 3.5. In reference to Table 5.3.1, the Coralline Crag is the key geological receptor and ESC would not support any avoidable disruption of this geological feature.
- 3.6. Paragraph 4.2.4.29 states '*At the preferred Suffolk landfall, there is a net northerly sediment transport. Aldeburgh is situated south of the promontory of Thorpeness, which restricts the southward net littoral drift.*' Further research is needed to support this statement (presumably adapted from SMP7 Appendix C Coastal Processes). Other, more recent, investigations suggest alternative sediment transport directions as listed below:

The coast between Lowestoft and Orford Ness shows predominantly north to south transport. Localised reversal in net transport is evident at Benacre Ness and also at Thorpeness. Burningham, H., and French, J. 2016. 'Shoreline – Shoreface Dynamics on the Suffolk Coast' The Crown Estate, 117 pages.

Divergence of longshore transport may occur locally, likely influencing the high alongshore variability. Alongshore Variability in the Response of a Mixed Sand and Gravel Beach to Bimodal Wave Direction by John Atkinson & Luciana S. Esteves, 2018.

Since the net alongshore sediment transport from Sizewell Bay is directed to the south, there must be mechanisms that facilitate sediment to move around the Ness and thereby maintain the beaches at Thorpeness. Mott MacDonald
<https://www.coasteast.org.uk/assets/img/1414342.pdf>

- 3.7. ESC welcomes the research into trenchless cabling techniques such as Horizontal Directional Drilling (HDD) to minimise impact on the coastal environment, though some trenching is likely to be required.

- 3.8. Table 4.2.5 identifies erosion estimates for the Aldeburgh to Thorpeness coastline, and ESC requests the source of these erosion estimates be provided. ESC agrees that a desktop study be undertaken to investigate if the impact on the current coastline is significant. ESC would wish to see the desktop approach taken to coastal change assessment by Scottish Power Renewables (SPR) for the proposed East Anglia One North and East Anglia Two projects repeated in this scheme, as an example of good practice.
- 3.9. Paragraph 4.2.4.29 identifies further predicted erosion rates, and ESC requests the source for these forecasted erosion rates be provided.
- 3.10. Paragraph 4.10.4.16 states that there have been 17 bathing areas in the study area, none of the listed bathing areas are in Suffolk. The EA's official list of bathing waters (test sites) is not representative of the popularity of bathing beaches in Suffolk and especially between Aldeburgh and Thorpeness. Other recreational activities such as bathing and dog walking are also popular at Sizewell Gap. More research and consideration is required as to the impact of this scheme on coastal recreation in Suffolk.