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**Your ref:** EN020033  
**Our ref:** Lion Link EIA Scoping Response April 2024  
**Date:** 4 April 2024  
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Dear Laura Feekins-Bate (Senior EIA Advisor on behalf of the Secretary of State)

**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 LionLink Limited (the Applicant) for an Order granting Development Consent for LionLink (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 Lion Link EIA Scoping Report dated March 2024. 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 Lion Link project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed<sup>1</sup>, within the district. It is therefore essential that the project is not considered in isolation, and the full cumulative effects of Lion Link with other projects and proposals is adequately and appropriately assessed, mitigated and where appropriate compensated. In addition to the NSIPs that are 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

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

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

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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.

We have reviewed the EIA Scoping Report and associated consultation materials together with the Supplementary Non-Statutory Consultation Summary Report (March 2024) which was published alongside the Scoping Report.

ESC was disappointed to learn of the early dismissal of exploring more extensive offshore options for connecting the project, as opposed to the need case being presented for a connection at Friston. We note that the Lion Link response in the Consultation Summary Report states that *'Lion Link is an offshore alternative to generating energy that would otherwise have to be produced onshore.... a fully offshore grid (or energy island) does not (and could not) form part of the project that is being consulted upon. LionLink must operate within existing legislation and regulations, and an offshore grid would require changes to these'*.

ESC remains disappointed that there is no clear justification provided as to why an offshore connection option is not being explored further. ESC considers this should be fully explored, minimising the need for onshore infrastructure within our district.

The Consultation Summary Report states *'We can clarify that even with the provision of offshore converter stations and substation(s), onshore infrastructure would still be needed to connect to the onshore national electricity network. For instance, cables will still need to run onshore from an offshore grid; onshore converter stations would still be needed to convert the electricity (HVDC to HVAC) and; a substation to transform electricity into the required voltages. We are listening to community feedback and understand the concerns about the impact of LionLink on the natural environment. Minimising the environmental impact onshore and offshore is front of mind as we develop our proposals'*. This is extremely disappointing.

ESC recently wrote to the Rt Hon Claire Coutinho MP (Secretary of State for Department of Energy Security and Net Zero) to request a full cost-benefit analysis of the options for connecting all the currently proposed and consented offshore wind, Multi-purpose Interconnectors (MPIs) and reinforcement projects to users in the UK, with prioritisation given to the offshore solutions connecting power directly to areas where the demand is needed and the utilisation of brownfield sites.

ESC has previously requested National Grid comprehensively and robustly explore every opportunity for coordination of the Lion 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 continues to have significant concerns regarding the Lion Link project for the reasons set out in this letter and we will seek to press the Secretary of State and PINS to timetable together the Examinations on connected NSIP proposals to ensure these matters can be fully explored by the respective Examining

Authorities, allowing the communities to participate in a structured way. We therefore maintain our objection to this project based on the current proposals. The Lion Link project fails to deliver coordination with British offshore wind energy providers (or any other British energy project), missing vital opportunities to reduce the amount of onshore connection infrastructure required across projects within our region. National Grid Ventures (NGV) will be required to demonstrate the geographical need case for a connection at Friston in light of the current uncertainties discussed. ESC maintains the view that an alternative connection elsewhere would enable the potential use of the multi-purpose element of the interconnector to facilitate connection to offshore wind projects.

Should the Applicant progress the Lion Link project within East Suffolk, onshore coordination opportunities must be maximised with other projects (i.e. the Nautilus project (should this project connect within East Suffolk) and National Grid Electricity Transmission's (NGETs) Sea Link project). This will be a minimum expectation of ESC and the local communities we represent. ESC would urge NGV to focus on siting and routeing options which can facilitate this level of coordination. We remain disappointed at the lack of demonstratable coordination between projects and maintain our strong objection to the current proposals. Projects seeking to utilise connection offers in this region must be considered collectively to fully understand their impacts.

However, ESC is aware that the Government regulator for 'The Office of Gas and Electricity Markets' (Ofgem) published a press release on 1 March 2024<sup>2</sup> advising that the Lion Link project has been recommended for approval, whilst *'Ofgem is currently not minded to recommend regulatory support for another proposed OHA interconnector, Nautilus, as thus far it has not been judged to have sufficiently demonstrated its consumer value'*. The press release also states that the regulator has launched a consultation on its minded to position to fund the Lion Link project, but ESC notes this does not include the projects which have *'not thus far sufficiently convinced Ofgem that they meet the requirements for approval'* such as Nautilus. This news adds greater uncertainty for the proposed Nautilus project demonstrating a greater justification for the Lion Link project to make use of the alternative connection being explored by Nautilus at the Isle of Grain, rather than at Friston.

Whilst ESC welcomes the work the developer has undertaken to date in conjunction with NGET regarding the Sea Link project 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. The landfalls identified within the consultation remain of significant concern and will result in undesirable adverse environmental, economic, and social impacts. East Suffolk is a highly designated landscape with high ecological sensitivity to proposed development, noting that coastal tourism is an important aspect within our local economy.

ESC is disappointed to learn that the proposed landfall options for Lion Link requiring the shortest onshore cable route have both been discounted (i.e. Landfall E Aldeburgh and Landfall H Dunwich). Justification is provided for this stating that the Aldeburgh landfall was discounted primarily due to significant environmental and technical risks associated with the nearshore approach to the site, crossing up to 11 other

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<sup>2</sup> <https://www.ofgem.gov.uk/publications/ofgem-gives-provisional-green-light-projects-power-millions-homes>

cable routes within the Outer Thames Estuary Special Protection Area (SPA). Given that the crossing of other subsea cables making landfall in the locality has been cited as a constraint factored into the emerging preferences for landfall, ESC highlights that insufficient information is provided regarding what the cables routes are for and whether these are constructed, consented, or proposed cable routes.

Whilst the report also states that there were onshore designations in the area creating additional challenges for the project at Aldeburgh, it is clear that the local communities within East Suffolk will have to endure a greater level of local disruption from the emerging preference of a longer onshore cable route via either Southwold or Walberswick. The Lion Link project has therefore missed an important opportunity to further reduce the level of onshore impact within East Suffolk, placing offshore considerations over that of local communities. The project also fails to maximise opportunities for co-ordination with the proposed NGET Sea Link project at its proposed Aldeburgh landfall site and cable corridor to the proposed co-located Saxmundham converter station site. ESC does not agree that enough has been done to fully explore this possibility prior to the notion being dismissed by the project.

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

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

Yours faithfully,

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

**Philip Ridley BSc (Hons) MRTPI**  
Head of Nationally Significant Infrastructure Planning  
East Suffolk Council

## **Appendix 1 – ESC’s Detailed Comments on the Lion Link Scoping Report**

### **Scoping Report – Main Text - Introduction**

#### **Chapter 1. Introduction 1-1**

##### 1.1 Overview of the Project

Paragraph 1.1.5 states *‘The GB portion of the Project comprises the following key components:... Submarine electricity cables from a proposed Landfall Site (at either Southwold or Walberswick) at the mean high-water mark at the UK coast to the edge of the UK Exclusive Economic Zone (EEZ)’*.

ESC’s Coastal Management concern relates to the proposed landfall at Mean High Water Mark (MHWM) being mentioned, this could cause confusion and should be reworded. Will this mark be the present level, or the MHWM at end of cable lifetime (+4 – 60 years). Will anything be exposed at MHWM? It is assumed the cable would be buried using HDD techniques. Paragraph 2.3.89 mentions the exit point is 1km from coastline – so why is MHWM mentioned here? Further clarification is required in relation to this matter.

##### 1.4 The need for the Project 1-2

Paragraph 1.4.3 states that *‘The objective of the Project is to connect the British and Dutch NTS and Dutch offshore wind generation by 2030, for the purpose of achieving the energy security and supply benefits that come with a project of this scale and contributing to the UK Government’s target to realise at least 18GW of interconnector capacity by 2030’*.

It is understood that there are many uncertainties associated with international connection projects, being reliant on two Governments working together whilst balancing their own domestic and political interests. The proposed onshore connection at Friston adds further uncertainties for this project, noting 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 (NGESO) in the Future Energy Scenarios. Projects seeking to utilise connection offers in this region must be considered collectively to fully understand their impacts. The benefits of this project for the East Suffolk District remain unclear given that this project seeks to import and export power to be transmitted elsewhere, whilst the impacts associated with the onshore infrastructure remain in situ affecting the local communities within our district, being set to host this development for years to come.

There is no clear justification provided as to why an offshore connection option is not being explored further in the consultation materials. ESC considers this should be fully explored, minimising the need for onshore infrastructure. Should this not be viable, NGV will be expected to provide clear justification why an offshore connection option has not been taken forwards. ESC recently wrote to the Rt Hon Claire Coutinho to request a full cost-benefit analysis of the options for connecting all the currently proposed and consented offshore wind, Multi-purpose Interconnectors (MPIs) and reinforcements projects to users in the UK, with prioritisation given to the offshore solutions connecting power directly to areas where the demand is needed and the utilisation of brownfield sites.

ESC previously welcomed the identification of this project as an MPI as part of the Offshore Transmission Network Review (OTNR). However, we also raised significant concerns (which remain current concerns) that there are no firm proposals in place to connect the MPI project to any other UK energy projects, unlike the Dutch offshore wind connections being proposed. It is apparent that Lion Link still effectively remains a point-to-point interconnector rather than a MPI in terms of British energy. The rebranding of the project from Euro Link to Lion Link suggests more of a UK focus, yet only European offshore wind has been included in the project.

Whilst MPIs were considered as one of the coordinated solutions within the OTNR, ESC remains disappointed that coordinated outputs within our region resulting from the OTNR and its 'Early Opportunities' workstream relate to Sea Link, North Falls and Five Estuaries rather than with Lion Link. We welcome that NGV, alongside other developers, signed a joint statement committing to exploring coordinated designs in East Anglia, with Lion Link also being accepted by Ofgem as a MPI pilot project, however, we were disappointed that Lion Link was not also nominated as a pathfinder project at that time.

The Lion Link MPI is therefore unlikely to include any offshore coordination at the British end, resulting in missed opportunities for associated coordinated reductions in the extent of the onshore infrastructure. As stressed in our previous consultation response, we find this unacceptable given that NGV has a connection offer in the Leiston area. East Suffolk has significant constraints along the coastline with high environmental sensitivity and designation. Given the anticipated generation predicted to require connection in the area in the future in our region, the lack of offshore wind coordination remains unacceptable. The current absence of any firm commitment to connect the project with British offshore wind in this region highlights that the proposed connection offer in Leiston has been poorly planned, making a connection for an MPI in this area geographically unsuitable, with better opportunities to connect the project up with British offshore wind at other locations.

In addition to the absence of coordination with British offshore wind, it is known that NGV are promoting a separate Nautilus MPI and NGET are promoting the Sea Link project, which all have the same proposed connection location. As requested in our previous consultation response, ESC continues to request that should all the projects proceed, NGV and NGET should work together to ensure maximum coordination between the projects is achieved onshore, minimising disruption and environmental impacts introduced through the construction of onshore infrastructure. ESC is also aware that there are additional connection offers listed on the National Grid TEC register at Friston, therefore NGV will be expected to work with these promoters as well in order to maximise coordination efforts in minimising the amount of onshore infrastructure required within East Suffolk.

The Overarching National Policy Statement for Energy (EN-1) states that the preference should be for coordination and seeks to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. This must therefore be fully explored, with robust justification being demonstrated should this not be viable across the proposed projects. ESC cannot at present see clear evidence of a coordinated approach being taken which raises significant concerns. We understand that the outputs from the Government piloting Offshore Coordination Support Scheme (OCSS)

were announced on 5 December 2023, and whilst the scheme was designed to encourage advanced offshore energy projects to develop coordinated options for offshore transmission whilst learning lessons to inform future projects, ESC notes that only North Falls and Five Estuaries offshore wind farms together with the Sea Link project were successful in receiving grant funding. Sea Link is expected to connect with Lion Link's proposed Friston substation and it is understood that converter stations will be co-located at Saxmundham for the projects. We will therefore continue to push both interconnector projects to co-ordinate at every opportunity.

#### 1.5 The need for an Environmental Impact Assessment 1-3

ESC agrees and supports NGV's commitment to undertake an Environment Impact Assessment.

#### 1.8 Structure of this EIA Scoping Report

Table 1-2 'Structure of the EIA Scoping Report' states that it *'Describes aspects to be scoped in and scoped out of the EIA. For those scoped in proposed methodology and approach to the assessment is included. These chapters also include an explanation of likely significant effects associated with each topic, in accordance with Regulation 10 (3) of the EIA Regulations'*.

ESC's Coastal Management concern relates to there being no Coastal Geomorphology chapter listed in either the 'Onshore' or 'Offshore' scheme, suggesting the project lacks EIA on coastal processes and receptors. It is noted that the Onshore scheme boundary goes down to Mean Low Water Springs (MLWS) and the Offshore boundary goes up to Mean High Water Springs (MHWS), and the intertidal range will be covered by both schemes – however there is no chapter designated to the EIA for cable landfall sites on the coast. ESC would welcome a separate chapter/topic in the EIA on 'Coastal Geomorphology'.

#### 1.11 Stakeholder engagement 1-11

##### Engagement and consultation with technical and specialist stakeholders 1-13

Paragraph 1.11.9 states that *'The Applicant will continue to engage with other developers in the area to consider opportunities for coordination, including Sea Link, Nautilus, Scottish Power Renewables and EDF Energy'*. ESC welcomes this approach noting the efforts made by NGV to consider the concept of co-location of converter stations, shared cable corridors, and consolidation of landfalls. 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. However, with regards to the SPR projects, at the time of writing the outcome of the legal challenges is not yet known and this will need to be revisited and potentially re-assessed, dependent on the decision from the courts. 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.

ESC strongly welcomes project coordination, however, remains disappointed that this has not been taken forwards for the proposed cable landfall site (with Sea Link progressing Aldeburgh), therefore the opportunity

to avoid additional disruption to coastal processes and amenity has been missed. ESC notes that co-ordination is dismissed in paragraph 2.3.47 which states that *'Sea Link's preferred landfall site is further south than those preferred for this Project. As a result, there is no opportunity to co-ordinate or co-locate at the landfall'*. ESC expects to see a robust justification from NGV regarding the lack of coordination.

## Chapter 2. The proposed Scheme Description 2-1

### 2.2 Proposed Scheme overview 2-2

#### Proposed Scheme overview

Paragraph 2.2.2 states that the proposed scheme will utilize *'Proposed high voltage alternating current (HVAC) Underground Cables between the proposed Converter Station in Suffolk and Friston substation; Proposed high voltage direct current (HVDC) Underground Cables between the proposed Converter Station in Suffolk, and a proposed Landfall Site at either Southwold or Walberswick'*. ESC fully supports the undergrounding of the HVAC and HVDC cabling removing the need for unsightly overhead transmission infrastructure.

### 2.3 Proposed Onshore Scheme 2-2

#### Friston Substation

Paragraph 2.3.4 states that *'There are various scenarios for how development of Friston Substation would be brought forward. This EIA Scoping Report presents two sets of parameters for Friston Substation: Amendments to Friston Substation – amendments to Friston Substation would be required if Friston Substation was built out by either EA1N/EA2 or Sea Link....; Proposed Friston Substation – if the Project was brought forward first, then it would be responsible for consenting Friston Substation for the Project, EA1N/EA2, Sea Link and Nautilus'*.

Paragraph 2.3.5 states *'The current assumption is that EA1N/EA2 would construct Friston Substation and the proposed Onshore Scheme would amend Friston Substation. However, as there is a scenario where the proposed Onshore Scheme could come forward first, the EIA will consider both scenarios within the assessments in order to ensure the EIA is robust in considering the worst-case scenario as well as the current assumption'*.

ESC recognises that NGV has a connection offer from NGESO in the Leiston area, and that it is proposed that the connection location will comprise the proposed Friston substation consented under the East Anglia One North (EA1N) and East Anglia Two (EA2) DCOs. However, the Lion Link connection agreement specifies the Leiston area rather than specifically identifying the proposed Friston site. The DCOs for the Scottish Power Renewables (SPR) projects (EA1N and EA2) identified Friston as the approved site for a National Grid substation and two substations for connecting the offshore wind farms. This was not approved on the basis of comprising a strategic connection hub providing future connections for projects including Lion Link.



The SPR projects have also been delayed due to the current legal challenges, and they also did not receive Contract for Difference (CfD) funding in the recent Round 5 Government allocation bringing project certainty and timeliness into question. It is understood that SPR are waiting for CfD before a fixed commencement date is set for the projects. Therefore, the planning and financial environment has changed introducing greater uncertainty for the projects. It is therefore wrong to assume that a connection in the Leiston area should automatically mean a connection at Friston. The NGV Lion Link project team must therefore fully justify why the siting and routing options for the MPI project is focussed on this connection site over other possible locations in the Leiston area, as denoted by the connection offer. Should the SPR projects not go ahead for whatever reason, ESC is unlikely to support the need case for a strategic National Grid substation providing a connection hub being located at Friston solely for the purpose of future connections at that site.

ESC is not aware of any specific geographical reason why the Lion Link MPI needs to connect in this area. In fact, NGV has announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary. If there is indeed no geographical reason why Lion Link needs to connect in this area (noting the project does not propose connections with British offshore wind in this region), ESC would welcome NGV similarly exploring alternative connection opportunities for this project which could provide greater opportunities for coordination.

NGV has identified possible converter station sites within a 5km radius of the proposed Friston substation based upon its experience and industry standard requirements, adding that the most efficient technical solution is to locate the converter station as close to the proposed Friston substation as possible for a variety of technical reasons, including minimising disruption and land take required for cable burial. The siting and routing options are predicated on the SPR consents and should there be any change to the status of the consents in the future, NGV will need to review the principles underpinning the site selection process for the Lion Link project. ESC continues to have significant concerns about the current proposals for this project and does not accept the current siting justification provided by NGV for the proposed onshore infrastructure, or the need case for the additional connection at SPR's Friston site (with or without the SPR projects) for the reasons stated.

#### Amendments to Friston Substation

Paragraph 2.3.6 also confirms that *'If Friston Substation is delivered by SPR, in accordance with the EA1N/EA2 consents, or by Sea Link, amendments to Friston Substation would be required in order to accommodate the connection of the proposed Onshore Scheme'*. ESC notes this would include *'Extension to the boundary of the site and installation of new boundary fencing and landscaping; Extension of the Gas Insulated Switchgear (GIS) Hall, including associated civil ground works and other mitigation such as drainage; Installation of up to two new GIS bays for the connection of the proposed HVAC Underground Cables, located within the extension of the GIS Hall building; Associated GIS equipment and busbars for the additional Series Reactor circuit bays and operational bays, such as Bus Sections, to be located within the extension of the GIS Hall; and Connection of a new 400kV Series Reactor static wound unit, located within the extended operational boundary of the substation'*. Therefore, assuming the Friston substation is constructed by SPR under the DCO approvals for EA1N and EA2, it is clear from *'Table 2-1 Key characteristics of the amended Friston Substation'* that

additional onshore infrastructure is needed to connect Lion Link at Friston including an additional 5m tall building to accommodate the connection, up to 1ha of land, and the relocation of the permanent access road. ESC does not support this requirement at Friston due to the need case concerns raised earlier in this response.

It is also understood that the SPR EA1N and EA2 projects gained consent for both an Air-insulated substation (AIS) and GIS substation, noting that SPR has not confirmed publicly they will be providing a GIS substation at Friston at the time of this response being written. ESC is concerned at the lack of transparency regarding this amongst developers, it is essential that a mechanism is in place to ensure that the proposed Friston substation is sized appropriately for the committed connections set out in this EIA Screening.

It is also alarming to ESC to read in paragraph 2.3.8 that *'if Friston Substation is not delivered by SPR pursuant to the EA1N/EA2 consents, or by the Sea Link or Nautilus Projects, Friston Substation would be delivered by the Applicant as part of the proposed Onshore Scheme'*, with paragraph 2.3.9 adding *'In this scenario, the Project would seek consent for Friston Substation to allow connections for the proposed Onshore Scheme, as well as for EA1N/EA2, Sea Link and Nautilus'*. This confirms that a connection 'hub' will be pursued at the Friston site either with or without the SPR projects. ESC and the local communities it represents do not support such a large scale urban development at this rural location and will continue to oppose it based on the weak need case presented. If it was the intention for the proposed Friston substation to become a strategic connection hub, this should have been made clear at the time of consenting for EA1N and EA2. The lack of transparency on this matter has caused a significant degree of mistrust in the community.

#### Proposed Friston Substation

It is noted in paragraph 2.3.8 that *'if Friston Substation is not delivered by SPR pursuant to the EA1N/EA2 consents, or by the Sea Link or Nautilus Projects, Friston Substation would be delivered by the Applicant as part of the proposed Onshore Scheme'*. Additionally, paragraph 2.3.9 states that in this scenario, *'the Project would seek consent for Friston Substation to allow connections for the proposed Onshore Scheme, as well as for EA1N/EA2, Sea Link and Nautilus'* comprising of a *'new GIS Substation to connect to the existing 400kV overhead lines (Bramford to Sizewell circuits 1 and 4) including associated civil ground works such as drainage'*.

Whilst ESC does not support the current need case presented for additional subsea cable connections at Friston for the Lion Link, Sea Link or Nautilus projects, the commitment by NGV to use GIS technology is supported under such a scenario as this would reduce the footprint of the required infrastructure at the site (when compared to the use of an AIS substation design). However, NGV will be expected to also set out a scenario where the additional projects looking to connect at Friston set out within the EIA Scoping do not come forward, a firm guarantee should be in place which demonstrates that the substation will be sized appropriately only for the committed connections.

#### Proposed HVAC Underground Cables

It is noted from Table 2-3 'key characteristics of the proposed HVAC Underground Cables if constructing for the proposed Onshore Scheme only' that the cable corridor for the project alone HVAC cabling requires a permanent easement of up to 30m, this fits with ESC's expectations in line with the East Anglia One North and East Anglia Two projects' proposed corridors widths. However, the table caveats this noting that *'This does not include land that may be determined to be required for potential mitigation following the assessment'*. ESC would still expect the overall project alone easement requirements to match those of other similar projects such as those stated. Should a greater than 30m easement be required for the project alone scenario, ESC would seek robust justification.

ESC notes in Table 2-4 'key characteristics of the proposed HVAC Underground Cables if providing the ducting for up to two other projects' that the proposed permanent easement increases to 'up to 60m'. Whilst this is considerably more than the project alone scenario, coordination efforts are supported in order to minimise the extent of onshore infrastructure required (and the associated disruption to local communities).

#### Proposed Converter Station

Table 2-5 'key characteristics of the proposed Converter Station' states that the permanent footprint will be 260m x 260m within a permanent land take of 'up to 6ha', caveating this by stating that *'this does not include land that may be determined to be required for potential mitigation following the assessment'*. It also states the maximum building height will be 26m above ground level. ESC requires comprehensive and detailed justification supporting the need for such parameters, demonstrating that the final design is the smallest it could be whilst still fulfilling its required function.

#### Proposed HVDC Underground Cables

Paragraph 2.3.43 states *'Where the Project is installing the HVDC Underground Cables for this Project and the ducting for up to one other project (Nautilus), the proposed Onshore Scheme would include an additional trench (two trenches in total) and additional four ducts (eight ducts in total) alongside associated temporary stockpiles of topsoil and subsoil. As a result, the working width would increase. The additional trench would be constructed and reinstated ready with empty ducts and works to install the cables within these ducts would be subject to separate project consents obtained by the project'*.

This confirms two matters for ESC, the first being that any co-ordination would only be with one other project, and the second being that this would be with Nautilus. However, ESC understands that the Nautilus project is in the very early pre-application stages and no preferred landfall yet known. For HVDC co-ordination to work for both projects, Lion Link would need to pre-empt the preferred landfall location for Nautilus as well as know that the project was connecting in East Suffolk, both of which is not possible prior to the project going through the formal consultation channels pre-DCO. ESC understands that the Nautilus project is currently exploring the viability for a connection at the Isle of Grain which if selected, confirms that no such co-ordination would be possible for Lion Link.

#### Proposed Landfall

Paragraph 2.3.48 states *'The proposed Landfall Site is the location where the proposed HVDC Submarine Cables would transition onshore. The submarine cables would connect to onshore cables at a buried Transition Joint Bay (TJB) which would be located within the proposed Landfall Site and defined by horizontal directional drilling (HDD) assessment. The extent of area that the TJB would occupy would be confirmed as the design develops and would occupy an area of up to 100m<sup>2</sup> based on an indicative footprint of 20m x 5m, however a larger temporary area of up to 2ha would be required during installation to accommodate construction equipment and storage'*.

ESC notes that HDD is to be used at the landfall site, however it is anticipated the installation of the TJB will require 'top down' digging. It is also noted that a land requirement of 100m<sup>2</sup> is a large area and the footprint of the buried TJB in relation to the dynamic shoreface must be considered, with allowance for climate change impacts and worst-case storm scenarios. ESC requires robust evidence that current and future rates of coastal change have been fully considered.

Paragraph 2.3.89 states *'Where the trenchless technique exits the seabed, a temporary pit (dimensions in the region of 10m wide, by 30m long by 2m deep) may need to be excavated to support the push-in of the ducts. A jack-up/spud barge or multi-cat may be located close to the target exit point (to support excavation works and handling of duct pipes). Excavators may also be used to support the excavation works, which would either access the work site from the beach or be deployed from a vessel such as a jackup/spud barge'*.

ESC notes that open pits are still required despite the proposed use of HDD, therefore the impact of digging these must be assessed in the EIA. It is also noted that the use of heavy plant on the beach could have significant impacts on coastal geomorphology and ecology i.e. the protected vegetated gravel habitat. This activity must be thoroughly assessed in the EIA in relation to the specific physical environmental conditions of the landfall sites. This activity Should not be scoped out of EIA.

## Onshore Scheme Construction 2-14

### Construction programme

Whilst it is appreciated that the construction programme dates are indicative as stated in paragraph 2.3.56, paragraph 2.3.57 indicates that construction works would be expected to begin in 2026, with completion expected in 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.

Paragraph 2.3.57 also states *'Friston Substation: Amendments to Friston Substation would take up to 13 months. Construction of the proposed Friston Substation, if necessary, would take 18-24 months which is typical for a new build substation'*. It was understood under the East Anglia One North and East Anglia Two applications that construction works for the proposed Friston substation 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.

#### Site preparation works

The enabling works described in paragraph 2.3.59 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 will require appropriate management of these works through a separate management plan, if the main management plans are not triggered until commencement.

#### Proposed Landfall

Paragraph 2.3.86 states that 'The offshore HVDC Submarine Cable installation at the proposed Landfall would be via a trenchless technique at each of the landfall sites, due to the height difference between the areas proposed for the onshore compounds and the offshore exit point for the trenchless technique'. Trenchless techniques are preferred by ESC as they reduce the impacts on the coastal environment and designated habitats.

#### Onshore Decommissioning 2-25

##### Proposed Friston Substation

Paragraph 2.3.106 states *'The lifespan of substation equipment is approximately 40 years. If it was determined that elements of the proposed Friston Substation were no longer required, they would be disconnected from the system before being dismantled and recycled or reused if possible. It is likely the decommissioning methods would be similar to those required to install the asset and decommissioning would be separately assessed at the time. As a result, it is not proposed to assess the impacts of decommissioning as part of the EIA'*. ESC notes that decommissioning of the proposed Friston substation, dependent on the number of connections, could become quite complex and requires careful consideration of any decommissioning plans.

##### Proposed Converter Station

ESC notes in paragraph 2.3.107 that *'The anticipated operational life of the proposed Converter Station is approximately 40 years. It is likely that during this period refurbishment and plant replacement would extend the life of the proposed Converter Station'*. Whilst it is stated in paragraph 2.3.106 that *'The lifespan of substation equipment is approximately 40 years'*, there is no mention of this being extended in the same way that the proposed converter station could be. Further clarification is therefore necessary to understand the relationships between the relative lifespans of the substation in comparison to the converter station. 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.

#### Chapter 3. Assessment of Alternatives 3-1

### 3.4 Outline of siting and routeing process 3-2

Paragraph 3.4.2 states *'Stage 1 – Identification of study area: This step sought to identify the extent of the study area within which converter station, landfall locations and cable corridors could be developed. The connection point to the proposed Friston Substation was used as the basis for defining the study area associated with the converter station and landfall locations'*. It is understood that Lion Link will be progressing a connection at the Friston site for the project alone or incorporating Sea Link / Nautilus projects either with or without the approved SPR EA1N / EA2 projects (noting both SPR projects remain the subject of legal challenges and are yet to be awarded CfD in the 2024 auction round). ESC notes that proximity to the Friston site directly influenced the siting of the converter and landfall for the project. It is essential that NGV commits to further consideration of their site options assessment following the outcome of the two 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.

### 3.5 Siting and routeing appraisal 3-3

#### Converter Station 3-3

Paragraph 3.5.2 states that *'A study area within 5km of the proposed Friston Substation was used to determine potential locations for a converter station'*. ESC is not aware of any specific geographical reason why the Lion Link project needs to connect in this area. In fact, NGV has announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary. If there is indeed no geographical reason why Lion Link needs to connect in this area (noting the project does not propose connections with British offshore wind in this region), ESC would welcome NGV similarly exploring alternative connection opportunities for this project which could provide greater opportunities for coordination.

NGV has identified possible converter station sites within a 5km radius of the proposed Friston substation based upon its experience and industry standard requirements, adding that the most efficient technical solution is to locate the converter station as close to the proposed Friston substation as possible for a variety of technical reasons, including minimising disruption and land take required for cable burial. The siting and routeing options were originally predicated on the SPR consents and should there be any change to the status of the consents in the future, NGV will need to review the principles underpinning the site selection process for the Lion Link project. ESC continues to have significant concerns about the current proposals for this project and does not accept the current siting justification provided by NGV for the proposed onshore infrastructure, or the need case for the additional connection at SPR's Friston site (with or without the SPR projects).

### 3.7 Next Steps 3-12

#### Detailed routeing and siting 3-12

Paragraph 3.7.2 states *'The detailed routeing and siting process continues and extends on the earlier approach, evolving from a desk-based baseline to site survey data as it becomes available, alongside input from statutory and local stakeholders. The process will also consider the feedback from future consultation activities to inform and review specific location and alignment options identified within the preferred cable corridors, landfall site and converter station site as well as opportunities for mitigation, including landscaping and biodiversity net gain'*.

ESC welcomes the commitment to delivering biodiversity net gain, noting later in the Scoping Report that NGV will be undertaking a *'Biodiversity Net Gain (BNG) assessment of the proposed Onshore Scheme'*. It is understood that Sea Link has committed to a minimum of 10% BNG across the project. This commitment is welcomed and should be echoed for Lion Link, noting emerging preference is for a longer onshore cable route between the landfall and converter station site, encompassing most of the East Suffolk District. Opportunities to exceed the minimum BNG requirements across the entire onshore order limits must therefore be fully explored.

#### Chapter 4. Legislation and Policy Overview 4-1

##### 4.1 Introduction 4-1

##### 4.2 Key Legislation 4-1

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.

#### Chapter 5. EIA Approach and Method 5-1

##### Temporal scope 5-3

Paragraph 5.4.13 states *'Construction effects are effects that are likely to occur during the construction phase of the proposed Scheme and are typically temporary or short-term. Construction is currently anticipated to commence in 2026 and take approximately 4 years to complete'*. Whilst ESC accepts that construction effects will last no more than 4 years, further clarification will be required in relation to the definition of temporary and permanent effects. 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.

##### 5.5 Assessment of effects and determining significance 5-4

##### Determination of significance 5-7

Paragraph 5.5.11 states *'In order to provide a consistent approach to expressing the outcomes of the various studies undertaken as part of the EIA, and thereby enable comparison between effects upon different environmental components, the significance of effect will be described using the terms neutral, minor,*

*moderate or major, except where required otherwise by guidance. Within the EIA process, 'significant' effects are considered to be those where the significance of the effect is assessed as being 'moderate' or greater. Minor or neutral effects are generally deemed to be 'non-significant'.* See below response to Section 5.6 regarding intra-project cumulative effects.

#### 5.6 Cumulative effects assessment 5-8

ESC notes the detail provided in Section 5.6 regarding 'Intra-project effects' and 'Inter-project effects', however, wishes to highlight that whilst 'significant' effects are considered to be those where the significance of the effect is assessed as being 'moderate' or greater, when intra-project cumulative effects are taken into consideration, individual not-significant impacts could become significant when their interrelationship is assessed.

#### 5.11 Consultation and engagement 5-10

In reference to complaints and community engagement, ESC highlights that effective community engagement and complaint response (and where appropriate resolution) is a key part of all stages of large-scale projects such as Lion Link. The project should have well developed community engagement and complaint procedures, the latter of which should include notification to and engagement with the LPA within a reasonable time period. The measures to be employed should be detailed in the Code of Construction Practice (CoCP) or in a separate management plan secured through the DCO.

#### 5.12 The Rochdale Envelope 5-11

The need for the Rochdale Envelope approach ahead of detailed design of the project is noted and accepted. 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. ESC notes that NSIPs are meant to be exemplar projects due to their scale and national significance. ESC expects a commitment to this to be reflected in a Design Principles Statement secured through the DCO.

### **Scoping Report – Main Text - Onshore**

#### **Chapter 6. Air Quality 6-1**

#### 6.3 Baseline conditions 6-2

#### Baseline 6-4

Paragraph 6.3.15 states '*ESC have declared one AQMA in the local authority, The Suffolk Coastal District Council AQMA No.3, but as the AQMA is located more than 2km from the Onshore Scoping Boundary, it is not of concern for this assessment*'. It may well be the case that the Air Quality Management Area (AQMA) is more than 2km from the onshore scoping boundary, however 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 (southwest of Saxmundham and close to the proposed converter station site). ESC suggests a wider scoping boundary should be considered to include impacts on the wider road network and potential impacts on junctions, considering cumulative effects with other developments.

#### 6.6 Scope of the assessment 6-13

Paragraph 6.6.6 states that *'The assessment will consider both human health and ecological receptors. Air quality effects associated with additional road traffic during the construction or operational phase will be assessed at receptors (both human and ecological) within 200m of roads that experience a change in traffic which meet criteria outlined in the EPUK/IAQM landuse planning guidance'*.

ESC agrees that the impact from traffic emissions associated with the project should be assessed against Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) landscape planning guidance. However, we remain concerned that there is a large quantity of energy infrastructure development planned within the district over the next decade with significant impacts related to the numbers of heavy good vehicles (HGVs) on the road network (and possibly light goods vehicles (LGV)/cars). Many of these developments (even large NSIPs), individually assessed, will show traffic levels under the screening values in the guidance and thus it will be concluded that no further assessment or mitigation is required. However, ESC remains concerned that potential cumulative impacts are not being sufficiently assessed holistically which is paramount given the large numbers of NSIPs planned within the pipeline. ESC therefore wishes to stress the importance of a cumulative assessment of the impacts covering all approved/proposed development in the areas potentially impacted by this project.

Paragraph 6.6.7 states that *'As a result of the number of nearby sensitive receptors, construction dust will be scoped into this assessment. A dust risk assessment will be appended to the Construction Environmental Management Plan (CEMP), to document the compliance assessment and to identify any further good practice measures. This will follow the approach set out in the IAQM Construction Dust Guidance'*.

In respect of the proposed dust risk assessment appended to 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.

ESC notes within Table 6-3 'Proposed scope of assessment' that construction air quality impacts have been scoped into the assessment in reference to ecological and human receptors, this is welcomed.

Paragraph 6.6.10 states that *'Assessment of emissions from construction generators and [Non-Road Mobile Machinery] NRMM has been scoped into the EIA due to the potential of temporary deterioration of local air quality. Best practice measures will be recommended to minimise the emissions from these sources and therefore the resulting impacts will unlikely be significant'*. ESC supports this 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.

ESC is pleased to see that following meetings between the authorities and Lion Link, that construction dust impacts and the impact of NRMM are both now scoped in. It is acknowledged that construction routes and site entrances are not yet known and therefore the study areas for traffic emissions are yet to be defined. As discussed in the meeting, there is likely to be a need to consider the impact of road traffic pollution on the wider road network, i.e. further than the current proposed 2km. This is of particular relevance to the assessment of the cumulative impacts with other projects in the area.

In terms of receptors, it is important to consider isolated receptors in addition to those in towns and villages. There are isolated receptors nearer to source than those stated in paragraphs 6.3.27–3.3.46. Proposed study areas when proposed and accepted, will not prejudice complaints from sensitive receptors from further afield should they be received in the event that the project is consented and implemented.

It should be recognised that the control measures listed in paragraph 6.5.4 are examples of mitigation and that mitigation is not limited to these.

In reference to paragraph 6.6.7, ESC notes that a full Dust Management and Monitoring Plan (DMMP) (not the dust risk assessment as specified) needs attaching to the CEMP or CoCP. It is agreed that the Construction Dust Assessment Methodology should follow the IAQM guidance. However, there is no mention of monitoring of pollutants to measure compliance. It is therefore important that the project commits to preparing a DMMP which will be submitted and approved prior to commencement with further Dust management Plans (DMPs) required at contractor level if detail is not available at the time of development of the DMMP.

## Chapter 7. Agriculture and Soils 7-1

### 7.6 Scope of the assessment 7-8

ESC notes the scope of the Agricultural and Soils assessment and has no specific comments at this time.

## Chapter 8. Ecology and Biodiversity 8-1

### 8.3 Baseline conditions 8-4

#### Study area 8-4

ESC notes the buffer distances for the desktop study area set out in paragraph 8.3.3, these are considered acceptable for the assessments proposed.

#### Baseline data sources 8-5

The sources of baseline data set out in Table 8.1 are noted. Whilst obtaining data on non-statutory designated sites; Protected, locally scarce and rare species; Invasive Non-Native Schedule 9 species and Ancient, Veteran and Notable Trees is welcomed, it is noted that this data was provided in January 2023. Given the time which has elapsed since that date, it is requested that the Environmental Impact Assessment is based on an up-to-date data search to ensure that all necessary available records are considered in the assessment.

In reference to 'Statutory designated sites: national value', whilst it is correct that there are a number of nationally designated sites (particularly Sites of Special Scientific Interest (SSSIs)) that have overlapping boundaries with international sites (paragraph 8.3.13), it is important that the assessment recognises that these sites do not necessarily share the exact same designation features. It must be ensured that the assessment appropriately considers all relevant designation features for both national and international designated sites.

In reference to 'Irreplaceable habitats', whilst consideration of irreplaceable habitats within the scope of the assessment is welcomed, the habitat types identified in paragraph 8.3.20 appear to include several which do not qualify as irreplaceable. It is recommended that the recently published national guidance on irreplaceable habitats ([Irreplaceable habitats - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/irreplaceable-habitats)) is used to determine which qualify as irreplaceable and which are notable for their nature conservation value.

In reference to 'Notable habitats', it is noted that paragraph 8.3.26 states that Biodiversity Metric 4.0 will be utilised for the BNG assessment for the project. Metric 4.0 was replaced by the Statutory Biodiversity Metric in February 2024. Whilst it is acknowledged that this project will not be required to deliver mandatory BNG, nevertheless it is requested that the Statutory Metric is used for this project rather than Metric 4.0. It is noted that paragraph 8.7.21 commits the project to using the Statutory Metric.

In reference to 'Bats', whilst the species identified as potentially present in the study area (paragraphs 8.3.30 to 8.3.34) are accurate, it should be noted that a previous infrastructure project surveying close to the southern end of the Scheme Scoping Boundary recorded a single record of a Lesser Horseshoe bat (*Rhinolophus hipposideros*) during activity surveys. It is therefore requested that the analysis of bat survey data for this project considers the potential presence of this species in the area as part of the assessment. The proposed use of advanced licence bat survey techniques (ALBST) (paragraph 8.3.40) is noted, it is requested that the proposed trapping locations are confirmed with the Local Planning Authority (as well as with Natural England as the licensing authority) prior to this survey work commencing.

In reference to 'Breeding birds' and 'Wintering birds', whilst these sections highlight the importance of the area for breeding and wintering birds, particularly in relation to those species for which nearby Special Protection Areas (SPAs) are designated, it must be ensured that the assessment considers all breeding and wintering birds that may be impacted. In particular, it is essential that species for which other designated sites in the area are designated (including those with overlapping boundaries with the SPAs) are appropriately considered.

With regard to wintering bird surveys, it is noted that paragraph 8.3.58 states that survey methodology for the winter 2023/24 survey season is to be agreed with Natural England. Given that this survey window is now substantially complete it is hoped that agreement was reached prior to the survey work being undertaken. Confirmation of this would be welcomed.

## 8.6 Scope of the assessment 8-51

In reference to Table 8-8 'Proposed scope of the assessment', the scope identified is broadly acceptable, however it is considered that construction impacts (fragmentation, direct mortality, disturbance) on species for which international and national designated sites are designated need to be considered as specific receptors/impacts. Whilst impacts on habitats at the designated sites and impacts on protected/notable species are scoped in separately, we consider that assessment of impacts on such species where they are designated site features needs to be specifically included to ensure that they are fully considered in the assessment.

#### 8.7 Assessment methodology 8-55

##### Data sources 8-55

In reference to 'Expected survey requirements', it is noted from paragraph 8.7.5 that an Ecology Survey Strategy (ESS) has been produced for agreement with Natural England. ESC would welcome the opportunity to view this and to comment on the detail of the strategy for surveys scheduled to be undertaken in 2024.

##### Supporting assessments 8-61

Paragraph 8.7.20 notes that the project intends to agree the Habitat Regulations Assessment (HRA) Evidence Plan with Natural England through their Discretionary Advice Service (DAS) process. Given the international importance of the sites to be included in the Evidence Plan and HRA, it is essential that ESC and other relevant expert stakeholders are included in any discussion and agreement of the Evidence Plan, alongside Natural England.

### Chapter 9. Geology & Contamination 9-1

#### 9.7 Assessment methodology 9-17

##### Assessment method 9-18

Paragraph 9.7.10 states *'With respect to existing land contamination, a source-pathway-receptor approach will be applied to examine how the proposed Onshore Scheme would influence baseline conditions. The general approach outlined within the EA Land Contamination: Risk Management (LCRM)<sup>16</sup> guidance will be adopted for assessing risks. Potential contaminants will be identified using the Department of Environment (DoE) Industry Profiles series of documents<sup>17</sup>. Conceptual models will be developed for each of the baseline, construction, and operation scenarios, with the risks arising from the identified pollutant linkages assessed qualitatively. These risks will be compared to identify any impacts arising from the construction or operation of the proposed Onshore Scheme'*.

ESC advises that 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 in order to protect sensitive receptors both on-site and offsite. The developer should also develop a robust discovery strategy to cover the eventuality that

unexpected contamination is encountered so that it may be appropriately addressed. This should include consultation and agreement with ESC in respect to the management of and land contamination that is found.

## Chapter 10. Health and Wellbeing 10-1

ESC is aware that there are growing concerns being raised in the local community about the impacts of multiple NSIPs on their health and wellbeing, particularly their mental health. ESC therefore requests that given the unique situation being faced in this locality, that greater focus in the area of Health and Wellbeing is required, including robust assessments and appropriate mitigation being provided.

### 10.5 Design and control measures 10-11

#### Control measures 10-12

Paragraph 10.5.5 states *‘A Community Framework would be produced, which would set out the key measures to protect the community from adverse effects and provide a process for dealing with concerns or complaints. Appropriately experienced community relations personnel employed to implement the Framework and provide a point of contact for community issues’.*

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. 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.

In reference to paragraph 10.5.5 and the *‘use of appropriate lighting to prevent glare’*, 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 of the landfall, cable routes and substation and from the operation of the substation. A Lighting Management Plan should ultimately be provided and agreed with the relevant authorities and secured through the DCO

## Chapter 11. Historic Environment 11-1

### 11.6 Scope of the assessment 11-12

In reference to Table 11-4 ‘Proposed scope of the assessment’, whilst all aspects are scoped in which ESC supports, we wish to stress the importance of assessing both direct and indirect impacts through the alteration of the historic landscape. 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 \(planninginspectorate.gov.uk\)](#)). ESC also wishes to stress the importance of considering known non-designated assets not yet on the Historic Environment Record (HER) within the assessment.

## 11.7 Assessment methodology 11-15

### Legislation, policy and guidance 11-16

Paragraph 11.7.12 states *‘Legislation and policy relevant to the proposed Scheme and this chapter is outlined in Chapter 4 Legislation and Policy Overview and Appendix 4-A National Policy, Appendix 4-B Environmental Legislation and Appendix 4-C Local Policy’*.

A review of Scoping Report Appendix 4C: ‘Local Policy of relevance to the proposed scheme’ identifies the Local Policy Framework applicable to the consideration of heritage assets. In reference to the Suffolk Coastal Local Plan (2020), the relevant policies pertaining to the historic environment include:

- 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

In reference to the Waveney Local Plan (2019), the relevant policies pertaining to the historic environment include:

- Policy WLP8.29 – Design
- Policy WLP8.35 – Landscape Character
- Policy WLP8.37 – Historic Environment
- Policy WLP8.38 – Non-Designated Heritage Assets
- Policy WLP8.39 – Conservation Areas
- Policy WLP8.40 – Archaeology

### Assessment method 11-17

Overall, the scope and methodology described in the documents correctly take into account the expected designated heritage assets; i.e. Listed Buildings, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens.

In reference to Table 11-5 ‘Importance/value criteria for heritage assets’, Grade II\* Registered Parks and Gardens should be included in the ‘High’ Value category.

In reference to Table 11-6 ‘Magnitude of impact descriptions’, most (if not all) of the impacts on designated heritage assets will be impacts on their setting. Setting should be specifically mentioned in the table as a ‘key characteristic’. Under ‘Medium’ Magnitude of Impact; the term ‘Loss of heritage asset, but not adversely affecting integrity’ does not make sense. If a heritage asset is lost, then its integrity will be lost. Should this reference be ‘Partial loss of heritage asset’? Further clarity on these matters is sought by ESC.

## Chapter 12. Hydrology, Hydrogeology and Drainage 12-1

### 12.1 Introduction 12-1

ESC will primarily defer to the Lead Local Flood Authority (LLFA) 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.

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 LLFA. This includes a detailed assessment of the catchment topography and characteristics to accurately model surface water flow paths. Dependent on whether the Lion Link project progresses 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.

The project also has the potential to impact 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.

### 12.5 Design and control measures 12-17

#### Control measures 12-18

Paragraph 12.5.5 states *'Active licensed abstractions and private water supplies will be identified with landowners and appropriate measures would be considered during construction. In the event of a landowner or tenant reporting that installation activities have affected their water supplies, an initial response would be provided within 24 hours. Where the installation works have affected a private water supply, an alternative water supply would be provided, as appropriate'*.

ESC requires the developer to 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.

### 12.6 Scope of the assessment 12-20

In reference to Table 12-7 'Proposed scope of assessment', ESC notes that the operational impacts of the project 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.

## Chapter 13. Landscape and visual amenity 13-1

### 13.3 Baseline conditions 13-3

### Study area 13-3

Paragraph 13.3.3 states *'Desk study and fieldwork has determined that intervening landform, buildings and vegetation generally limit the extent of views to within 3km from the Onshore Scoping Boundary. Beyond this distance, significant landscape and visual effects are not considered likely to occur. This is the area within which construction and operational effects could arise and is based on an understanding of the local landscape and experience of working on similar projects'*. ESC is satisfied that all onshore aspects of the project are included in the described scoping boundary to a satisfactory buffer limit of 3km and with the level of desk study and subsequent field work undertaken to determine the onshore scoping boundary.

### Baseline data sources 13-3

In reference to Table 13-1 'Scoping baseline data sources', ESC is satisfied with the list of baseline sources used to inform the assessment of likely landscape and visual impacts, although the applicant should confirm whether the Suffolk Coast and Heaths National Landscape Management Plan 2023-2028 has been included for consideration, noting that the Consultation Draft has since been upgraded to a fully adopted active Management Plan.

The general overarching descriptions of topography, hydrology, landcover, vegetation patterns, land use and settlement, movement and connections are acceptable, and the summary of landscape designations is noted. The initial proposed set of visual receptor groups is noted but equally noted and welcomed is the intention to continuously review and revise as appropriate as the study progresses and the project design evolves. The described scope of potential impacts that could arise during construction and operation is also noted and agreed.

### 13.5 Design and control measures 13-11

#### Design measures 13-12

Paragraph 13.5.3 states *'The LVIA will be a key tool in informing the design of the proposed Onshore Scheme, to minimise harm to the landscape and to provide reasonable mitigation where possible and appropriate'*. ESC welcomes the claim that the LVIA will be a key tool in informing the design of the proposed onshore scheme in order to minimise harm to the landscape and to provide reasonable mitigation where possible and appropriate, ESC expect this to be an underlying principle of the whole project.

The potential embedded design measures outlined at paragraph 13.5.4 are noted and welcomed and will be expected to be adhered to.

#### Control measures 13-12

The control measures described in paragraph 13.5.5 to 13.5.8 are noted, but it should be understood that the tree protection measures outlined at 13.5.6 will also be expected to include an Arboricultural Method Statement which shall include the appointment of an arboricultural Clerk of Works.

### 13.6 Scope of the assessment 13-13



ESC accepts the described scope of the assessment set out within Table 13-3 'Proposed scope of the assessment'.

#### 13.7 Assessment methodology 13-17

The described assessment methodology is accepted, however it is not clear how Table 13-4 'Establishing landscape value criteria' is supposed to read. In Table 13-9 'Susceptibility of visual receptors to change', it is considered that people engaged in outdoor recreation or travelling along public rights of way (PROWs) which are not promoted routes, but where an appreciation of the surrounding landscape is relevant to the experience, should be considered as having 'High Susceptibility' as visual receptors in accordance with GLVIA3 para 6.33.

In all other respects, the described scope of the landscape and visual impact assessment is acceptable.

### Chapter 14. Noise and Vibration 14-1

#### 14.3 Baseline conditions 14-2

The Baseline Conditions and Study Area are broadly acceptable, all assessments must be undertaken with some degree of flexibility taking account of any location specific issues if they are found to ensure the assessments are representative.

The proposed study area of 300m from construction areas is accepted, although this will not prejudice complaints from Noise Sensitive Receptors from further afield should they be received in the event the project is consented and implemented.

In terms of paragraph 14.3.9, ESC agrees with the statement that ambient (and background) sound levels in the majority of locations are likely to be low along with the context of the quiet rural residential environment which should be held uppermost in any assessment of significance of impact, moreover the context of introducing what will be an industrial noise source should also be considered in those assessments.

In terms of paragraph 14.3.12, DEFRA noise mapping should be used as an informative only and should not be relied upon at the expense of adequate and appropriate assessment.

#### Baseline 14-3

In reference to the 'Future Baseline', this topic is of critical importance and the impact on background sound level creep is something that requires careful consideration. The project should seek to prevent background sound level creep, or where robustly justified, mitigate and reduce it to an absolute minimum. This is particularly important at Saxmundham where the potential for co-location of substations from different projects exists and at Friston where there will be a requirement for increased infrastructure in respect to grid connection. Close coordination of projects is not only expected but insisted upon to prevent cumulative issues like background sound level creep and to prevent or minimise noise and vibration impact across the board in this low background rural residential area.

The project should also be aware of the site-specific constraints in relation to the noise rating levels set for Noise Sensitive Receptors in the area of the Friston connection site which were set in the East Anglia One North and Two DCOs which includes the National Grid Connection Infrastructure.

#### 14.4 Potential impacts 14-5

The matters noted in section 14.4 are a reasonable suggestion for the types of potential impacts to be expected and are therefore agreed. However, that being said, a significant amount of further detail will be required as the project progresses and assessments should be refreshed at reasonable intervals in order to take account of developments that occur to ensure that they are accurate and representative, this should be embedded in the project's ethos moving forward.

#### 14.5 Design and control measures 14-5

This section contains some broad categories and high-level controls that are appropriate to this project, they should however form a basis for the design and control measures for the project rather than it being confined to only those stated. It is accepted that at this early stage a commitment to controlling noise and vibration is indicated, but significantly more detail will be required in the form of a comprehensive Noise and Vibration Management Plan to be agreed with ESC and secured by the DCO.

The expectation is that appropriate, adequate, (and were necessary) exceptional standards of design and control measures will be selected to ensure that not only are all policy tests met, but that the impact to the local area is reduced to a reasonable minimum. Projects of this scale and nature, particularly where they are part of a wider landscape of NSIPs, are expected to provide exemplar protection to the area they are being placed within.

The developer has committed to Best Practicable Means (BPM), as defined in Section 72 of the Control of Pollution Act 1974 which is welcomed. This needs to be in conjunction with BS5228: 2009+A1: 2014 in respect of site operations and mitigation for noise and vibration. It is important that all relevant sections of BS5228 are considered and implemented including particularly section 8 – Control of Noise.

#### 14.6 Scope of the assessment 14-6

ESC considered that the developer has scoped in the relevant areas in terms of Noise and Vibration, however further surveys are required moving forwards and there is a general expectation that the developer will design and manage this project with the minimisation and mitigation of Noise and Vibration in mind as a critically important impact. The scope of assessment is broadly accepted, however as stated in paragraph 14.6.6, items that have been scoped out have been done so on the basis that there is clear evidence that impact will not be significant. This evidence will need to be discussed and justified in the PEIR with an appropriately detailed summary to ensure that these matters have been adequately considered and correctly scoped out. It is of critical importance that the scope of all assessments undertaken includes a robust assessment of cumulative effects with other NSIPs (and where appropriate, other large developments) within the district to ensure that combined impact is not unacceptable.

#### 14.7 Assessment methodology 14-10

The presented assessment methodologies are broadly accepted but with the following comments, caveats, and requirements:

*Legislation, Policy, and Guidance* - A list of relevant documents has been provided which is generally accepted, that said care should be taken using BS8233 as this is out of scope for a development of this type. Equally, whilst the inclusion of NANR45 is welcomed as an acknowledgment of consideration of Low Frequency Noise (LFN), it too should be used with caution given the guidance's intended primary use to assist in the investigation of LFN as a Statutory Nuisance in a complaint scenario.

NPS EN-1, NPS EN-3 and the Noise Policy Statement for England from which the noise and vibration sections are derived should also be used in the consideration of noise and vibration for this project.

*Assessment Method* - Adequate cumulative assessment as detailed in paragraph 14.7.7 is a key element to the overall assessments for this project in order to identify and mitigate, amongst other things, background sound level creep in combination with other projects primarily at the Saxmundham substation site and Friston connection location, that said it is also essential any cumulative construction impact is considered and addressed across the project.

*Baseline Surveying* - The areas that will be covered by the baseline sound level surveys, being in the vicinity of noise sensitive receptors near the proposed Friston Substation Site, proposed Underground Cable Corridor, proposed Converter Station Site and proposed Landfall Site, is accepted along with the standard to be used in respect to the surveys, that being BS 7445-1:2003. Further engagement with us on the detail of those surveys has been committed to and is welcomed.

*Construction Noise* - The developer has stated that BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise, and specifically the “ABC” methodology of that standard is to be used to assess and control noise on this project.

Likewise, the developer has stated BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration is to be used to assess and control vibration. These are accepted as appropriate methodologies and accord with other comparable projects both consented and in consideration. Consideration of British Standard 6472-1:2008 for potential disturbance of people and British Standard 7385-2:1993 to assess risk of building damage are also accepted as appropriate.

*Construction Traffic Noise* - 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.

*Operational Noise* - The proposed study area of 1000m from the proposed substation site and the Friston site is accepted as reasonable, the inclusion of a mechanism to include more distant Noise Sensitive Receptors should the necessity arise is welcomed. In respect to Friston, the developer is again advised that

the National Grid Connection Sub Station is included in the East Anglia One North and Two DCOs in respect to the rating level for the site, this is a site wide constraint that they will have to consider in their assessments, and practically meet in operation.

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.

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 applications, but is equally relevant here and has been stated for other DCO projects within the district:

*'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'.*

Due to the size of these types of project, the 5dB below background is an aspirational target and one we ask 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 reasonable noise 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 National Policy Statement (NPS) EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise noise impact.

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. There will be a need for a requirement in the DCO 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.

The consideration of tranquillity as outlined in the Tranquillity Map: England is welcomed but it is important to consider the overall sensitivity of the area in this regard, particularly in terms of the current sound environment vs future potential noise character. This has been committed to as part of the assessment process which is further welcomed, however ESC wish to reiterate it here due to its importance in informing the determination of significance.

BS8233 and World Health Organisation (WHO) guideline levels may be considered in regard to a well-rounded assessment of impact, but their use should be done with caution, particularly in terms of BS8233 which as previously stated is out of scope for this type of development even if it is regularly used in this context.

*Determining Significance of Effect* - when determining significance of effect, the relevant policies will need to be satisfied, that is to say NPS EN-1 and the Noise Policy Statement for England (NPSE) and should relate back to a recognised standard that ascribes significance of impact such as BS4142 in respect to operational noise.

As previously stated, the acoustic character of the noise, the context of that noise and the context of the area should play an important role in determining significance alongside the objective monitoring, assessment and modelling of noise.

#### 14.8 Assumptions and limitations 14-15

Whilst the assumptions and limitations stated are broadly accepted, ultimately, ESC require a robust set of assessments to ensure that the conclusions that are made result in adequate protection to noise sensitive receptors. The precautionary approach stated is welcomed but is also expected to ensure that any uncertainties that are inherent in these assessments are kept to a minimum. ESC requires a firm commitment to refreshed assessment as necessary when significant further details become known to refine the outcomes in respect to significance and control of impact.

### Chapter 15. Traffic and Transport 15-1

#### 15.1 Introduction 15-1

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.

#### 15.3 Baseline conditions 15-2

##### Study area 15-2

Paragraph 15.3.2 states that *'The extent of the study area for the assessment of transport impacts has not been defined in detail at this stage'*, with paragraph 15.3.4 adding that *'The study area will be reviewed and, as appropriate, refined for the assessment in the Preliminary Environmental Information (PEI) Report and Environmental Statement (ES) with only one Landfall and one High Voltage Direct Current (HVDC) Underground Cable Corridor being taken forward. The study area will be based on the proposed Order limits in the ES'*.

The commitment to review the proposed study area 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. It is important to ensure that the study area is not too narrowly defined and includes appropriate

consideration of junctions. 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.

The study area must be sufficiently sized to consider 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.

## Chapter 16. Socioeconomics, Recreation and Tourism 16-1

### 16.2 Consultation and engagement 16-1

The ESC agrees with the main thematic issues raised during the non-statutory consultations and remains particularly concerned with the potential adverse impacts of the project on:

- a) The visitor economy in East Suffolk, especially visitor perception and experience during the construction phase of the project;
- b) Businesses located within the Scheme Scoping Boundary, as well as those businesses in proximity of the boundary;
- c) The themes raised by other special interest groups and organisations.

In addition, the potential 'in-combination effect' of the project and other NSIPs locally is of significant concern.

ED&R welcomes any opportunity to secure employment or apprenticeship opportunities for local residents during the construction or operational phases of the project.

ESC welcomes the opportunity for further engagement and discussion relating to;

- a) The extent of the study area;
- b) The local businesses identified as receptors;
- c) And the assessment of the potential impact on tourism.

### 16.3 Baseline conditions 16-3

ESC considers the aspects considered within the structure of the baseline to be appropriate. However, for local businesses, the impact on town centre vitality might also be a useful measure of socio-economic impacts of the project. Both within and in near proximity of the scoping boundary.

### Study area 16-3

ESC welcomes confirmation that the option to review and refine the study areas is embedded within the Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES). Particularly as ESC is concerned that the local study area appears to encircle, and therefore omit an assessment of project impacts on the town of Southwold. Equally, impact on the town of Saxmundham has been omitted despite

its close proximity to the scoping boundary and local study area limits. ESC feel that the local study area limits should be extended to fully include the towns of Southwold and Saxmundham.

#### Baseline data sources 16-4

ESC remains concerned that the baseline data for key receptors such as businesses will be sourced solely from internet-based searches. Internet based searches can be limited by the timeliness and availability of the data, its specificity and relevance, especially for a relatively small local study area. The sole reliance on desk-based research is puzzling to ESC and therefore not supported.

*Employment, economic activity, and the labour Market* - ESC questions the sensitivity of the age profile, employment and economic activity, and industry of employment to the socio-economic impacts of the project, and thereby limiting its value as reference indicators. Especially as the frequency and timeliness of updated data is limited.

*Local Businesses* - ESC would like to re-iterate that it seems short-sighted to omit the town centres of Saxmundham and Southwold from the local study area. Particularly as parts of each town fall within the planned limits of the local study area.

*Visitor Attractions and Tourism Destinations* - ESC concur that 'much of the local study area', and probably all, is considered a visitor destination and of considerable importance to a successful visitor economy.

Equally, many of the towns and villages locally, as well as the individual visitor attractions identified within Table 16-6 'Visitor attractions within the local study area' are important contributors to the visitor economy.

#### 16.4 Potential impacts 16-13

##### Construction 16-13

ESC agrees with the potential impacts described in paragraph 16.4.2 during the construction phase. The Council agrees with the assessment that the majority of the socio-economic impacts generated by the project would be experienced during the construction phase only; and that the operational phase could have positive direct impacts on employment.

#### 16.5 Design and Control measures 16-13

##### Design measures 16-14

ESC welcomes any design measures that limit the potential impacts of the project whilst recognising that some impacts are inevitable.

##### Control measures 16-14

ESC welcomes the control measures described to limit the magnitude of impact on receptors but would encourage continued review and exploration of additional control measures that could limit the impact of the project.

## 16.6 Scope of the assessment 16-14

ESC has reviewed the receptors in Table 16-8 'Proposed scope of the assessment' and agree with the assessment in terms of potential impacts during the construction and operational phases of the project. However, it is more difficult to consider the lasting impacts of the project on receptors during the operational phase and therefore ESC remain cautious.

## 16.7 Assessment methodology 16-22

### Data sources 16-22

ESC has been clear that there may be an over reliance on desk-based studies during the assessment. Whilst we recognise the value of desk-based research, it remains to be convinced that this is the best approach and look forward to reviewing the evidence base as it unfolds.

## Chapter 17. Material assets and waste 17-1

### 17.1 Introduction 17-1

ESC notes the scope of the assessment and has no specific comments at this time.

### **Scoping Report – Main Text – Offshore**

ESC is disappointed to learn that the proposed landfall options for Lion Link requiring the shortest onshore cable route have both been discounted (i.e. Landfall E Aldeburgh and Landfall H Dunwich). Justification is provided for this stating that the Aldeburgh landfall was discounted primarily due to significant environmental and technical risks associated with the nearshore approach to the site, crossing up to 11 other cable routes within the Outer Thames Estuary Special Protection Area (SPA). Given that the crossing of other subsea cables making landfall in the locality has been cited as a constraint factored into the emerging preferences for landfall, ESC highlights that insufficient information is provided regarding what the cables routes are for and whether these are constructed, consented, or proposed cable routes. Further justification for the discounting of the Aldeburgh landfall is necessary given the potential coordination opportunities.

## Chapter 18. Marine Physical Environment 18-1

### 18.3 Baseline conditions 18-2

#### Baseline 18-3

Paragraph 18.3.7 states *'This section provides a summary of the baseline marine physical environment in the study area, based on a review of tidal regime, meteorological information, wave climate, bathymetry and seabed sediment data and information from desktop study/reports. In addition, consideration is given to the future baseline, assessing potential for change during the operational lifetime of the Offshore Scheme'*.

ESC welcomes a thorough investigation in to marine and coastal environmental baseline conditions (established at scoping). However, clarification should be provided as to how the project-induced deviation



from the baseline will be ascertained and differentiated from naturally-induced (i.e. climate and geomorphological changes) to baseline conditions over time? This should be given consideration and explanation in the Environmental Impact Assessment (EIA)/Environmental Statement (ES).

Table 18-1 'Key data sources for baseline assessment' includes reference to '*Shoreline Management Plan – SMP7 - Local annual surveys of coastline - Coverage Relative to Study Area: Coastal*'. ESC wishes to highlight that the SMP description is incorrect. SMP's are non-statutory, high level, strategic policy documents for coastal flood and erosion risk management and planning purposes. The description error must be corrected. The SMP7 is a key document to consult however it is also old and better data is available from more contemporary sources. The EIA must show reference to a wider bibliography and fresh data for baseline assessment.

Table 18-1 also includes reference to the East Anglia projects' EIA and supporting studies regarding 'Review of baseline characterisation data'. It is positive that these reports, which are good examples of geomorphological change assessment, are referenced by NGV. ESC would like to see NGV adopt a similar approach to that used by SPR in their Landfall Location Assessment, with justification of final site selection.

#### 18.6 Scope of the assessment 18-18

Paragraph 18.6.7 states '*The physical processes features which are considered as potential receptors will be guided by the tidal excursion and will include: The adjacent coastline, particularly at the proposed Landfall sites (Southwold and Walberswick); Designated sub-tidal sandbanks; Nationally or internationally designated sites with seabed/sedimentary or geological interest features below MHWS; and Designated bathing waters*'.

The specific features/receptors of the generic 'coastline' at each landfall site should be actually named, mapped and described in the EIA.

Table 18-4 'Proposed scope of the assessment' scopes out the Construction Phase - Coastal morphology Receptor - Changes to coastal morphology stating '*Where the submarine cable makes landfall, disturbance of the coastal morphology will be minimised by use of trenchless techniques. A comprehensive coastal processes assessment would be conducted to analyse shoreline erosion rates, shoreline retreat and beach draw down. The assessment will inform the onshore position of the transition joint bay, the trajectory of the HDD to ensure burial over the asset lifetime and the HDD exit point. The land to sea transition will be engineered to ensure asset security i.e., to ensure the cable does not become exposed. This design measure will avoid impacts on coastal morphology during construction and operation....*'.

ESC welcomes the comprehensive coastal processes assessment to be conducted, and only after this assessment is evaluated should the potential for significant effects be dismissed. ESC does not agree on scoping out of EIA. Despite trenchless techniques being used, there may be a coffer dam installed and therefore the impact to this receptor should not be scoped out prematurely.

#### 18.7 Assessment methodology 18-26

Data sources 18-26

In reference to Table 18-5 'Key publicly available data sources for physical processes' and Table 18-6 'Scope of geophysical and geotechnical cable route survey' regarding Topographic and Intertidal Survey, the Anglian Coastal Monitoring programmes (ACMP) open source data should also be added to the data sources which includes topographic transects over the landfall sites since 1991, Lidar data, bathymetry, and annual aerial photography. These sources should be used to help analyse current geomorphological and hydrological change rates. ESC welcomes the collection of contemporary data as per the intended intertidal survey, the data gathered can then be analysed and compared to the aforementioned ACMP data to give an overview of recent changes.

#### 19. Intertidal and Subtidal Benthic Ecology 19-1

##### 19.6 Scope of the assessment 19-13

Table 19-5 'Proposed scope of the assessment' scopes out 'Construction and operation - Intertidal and nearshore habitats - Temporary habitat loss / seabed disturbance' stating '*The HDD will exit seaward of the low water mark and will therefore avoid disturbance of the intertidal area. The boundary of the proposed Onshore Scheme lies above mean high water springs and therefore outside of the intertidal zone*'.

The Intertidal area should be considered as anywhere between Highest Astronomical Tide and Lowest Astronomical Tide. Despite the use of HDD techniques, the impact of construction and operation activities on the intertidal area should not be scoped out at this early stage. Heavy plant on the beach, in the event of access required, should be assessed within the EIA.

#### Scoping Report – Main Text - Offshore chapters 20 to 26 (20-1 to 26-24)

ESC has no comments to make at this time.

#### **Scoping Report – Main Text – Proposed Scheme Wide:**

##### Chapter 27. Climate Change and Carbon 27-4

ESC has no comments to make at this time.

##### Chapter 28. Major Accidents and Disasters 28-1

ESC has no comments to make at this time.

#### Chapter 29. Cumulative Effects and Intra-project Effects of the Project 29-1

##### 29.1 Introduction 29-1

The previous comments highlighted within this response which relate to cumulative effects are relevant to this chapter of the Scoping Report.

##### 29.3 Cumulative assessment methodology 29-2

This section sets out the methodology to be used for inter-project cumulative effects. Paragraph 29.3.13 states *'The first step is to establish the Zone of Influence (Zol) for the proposed Scheme and from that a long list of 'other existing development and/or approved development'*. ESC acknowledges the commitment stated in paragraph 29.3.17 *'The Zols will remain under iterative review in response to refinement of the proposed Scheme design, feedback from consultees, identification of additional constraints and results of assessments undertaken to inform the EIA'*. This commitment is welcomed.

#### 29.5 Co-location 29-24

ESC highlights that within the section on cumulative effects, 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.'*

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.

#### Chapter 30. Summary 30-1

ESC has no comments to make at this time.