



**Our ref:** Sea Link Additional  
Consultation

**Date:** 09 August 2024

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Dear Sir/Madam,

### **Response of East Suffolk Council to National Grid Electricity Transmission Additional Consultation on the Sea Link Project**

East Suffolk Council (ESC) welcomes the opportunity to provide additional comments on the changes to the Sea Link project and the evolution of the project since statutory consultation was held October-December 2023.

This response is structured into overarching comments on the project and consultation, followed by detailed technical comments in the four themes identified in the consultation documents: changes to permanent infrastructure, changes to construction and maintenance work, changes to mitigation, enhancements, and the approach to biodiversity net gain, and changes to the strategy for coordination.

ESC's position on the Sea Link project at the 2023 statutory consultation was one of objection. The changes presented in this additional consultation do not change ESC's position of objection. Nonetheless, ESC has provided detailed technical comments in the response below. These comments are made in addition to those made at statutory consultation in 2023.

#### **Timing of the Additional Consultation**

ESC welcomes the additional consultation as an opportunity provide feedback on the changes made to the project since the last public consultation was held. While ESC appreciates that National Grid Electricity Transmission (NGET) has their own programme for the project, the timing and duration of the consultation has been particularly difficult to resource.

ESC welcomes the statement in the Project Update document that NGET has written to more than 35,000 homes and business across Suffolk and Kent to make people aware of the changes being made to the Sea Link proposals.

However, ESC maintains concerns about this additional consultation not being publicised sufficiently in advance and being too short in length to allow proper engagement.

ESC has raised significant concern with NGET about the additional targeted consultation, specifically the length of consultation over the summer. 8 weeks is a more appropriate period of time for a consultation, to

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allow stakeholders the time to engage properly and prepare an informed and comprehensive response. A consultation period of 5 weeks has presented a substantial challenge for the Council to review the consultation materials and prepare a response; a challenge undoubtedly shared by many other stakeholders and affected communities. This is a particular challenge for organisations and individuals where the timing of the consultation sits outside of their decision-making cycle, or where they are affected by the school holiday period.

This challenge has been exacerbated by the need to engage with multiple other nationally significant infrastructure projects (NSIPs) and consultations at the same time as the additional Sea Link consultation; notably Ofgem's consultations on Nautilus' interconnector licence<sup>1</sup> and changes to the Initial Project Assessment<sup>2</sup> with its abandonment of pursuing landfall and connection at the Isle of Grain and intention to progress the project in east Suffolk, being held along the same period.

Any additional consultation held in the peak summer period would present challenges, but the short length of this consultation has exacerbated the issue. Many town and parish councils do not meet over the peak summer period of July and August which makes it difficult for them to prepare and agree responses.

East Suffolk is host to multiple consented, planned, and known NSIPs and accordingly stakeholders and communities have come to expect appropriately timed consultations. ESC is conscious of consultation fatigue in communities trying to engage with multiple complex NSIPs at any one time.

### **Engagement in the Additional Consultation**

ESC welcomed NGET hosting four webinars in the consultation period. ESC attended the Suffolk and Kent webinars, and it was noted that these were well attended with lots of questions being asked by the audience across a matter of themes.

ESC noted that there were several recurring themes of questions from the public, including requests for more information about the Fromus crossing. There were requests for design visualisations, including illustrations to better understand the massing of the bridge in the landscape. Participants also noted concern at NGET's assessment of the bridge creating significant adverse effects on the setting of Grade II Listed Hurts Hall, and its setting in the landscape. Participants also raised concern about the potential loss of ancient woodland and veteran trees associated with the Fromus crossing

There was repeated significant concern about the increased core working hours and related impacts on residents' mental health and wellbeing, with several members of the public noting the presence of multiple construction projects happening in one geographical area at the same time.

Questions were asked about the timing of the traffic and transport surveys taking place in January and February, noting the highly seasonal tourist economy and resultant peaks in the summer months. Concerns about fly parking, concern about provision of worker parking, and potential for park and ride/car sharing schemes were raised.

Questions were asked about community benefit and compensation to local communities affected by the construction of the project, including impact on holiday rentals and tourist accommodation.

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<sup>1</sup> [National Grid Nautilus Limited - Notice of application for an Electricity Interconnector licence | Ofgem](#)

<sup>2</sup> [Changes to the Initial Project Assessment of the Nautilus Offshore Hybrid Asset | Ofgem](#)

There were several comments from members of the public noting participation felt limited in the webinars by virtue of participants having to type questions in the chat to be answered by the project team, instead of participants being able to use the microphone and camera functions to ask questions and engage with the project team directly. This may have been particularly pronounced as this consultation held no in-person webinars for people to attend and engage with in person.

East Suffolk's communities have had to engage with multiple NSIPs at once for several years, and so have developed expectations of consultations and engagement by developers and project promoters. Communities expect to be able to engage meaningfully with project promoters and importantly, feel that they are able to engage and be listened to.

## **Need**

NGET states the need case for Sea Link is based on the need to reinforce the existing network transmission infrastructure between Suffolk and Kent. The Project Update document states *"The growth in offshore wind, new interconnectors (which allow electricity to be shared between countries), and nuclear power stations, means that by the end of the decade the existing network will not have the capacity to reliably transport all the energy to where it is needed around the electricity network."*

However, in respect of exporting energy from Suffolk and Suffolk grid reinforcement, it is understood the need for the project arises once the Sizewell C new nuclear power station, LionLink, and Nautilus are all operational (the latter two not yet consented). Therefore, the reinforcement is not yet required, and should the identified projects not become operational at the times anticipated or not be delivered at all, then presumably this changes the need case for Sea Link. If Sea Link is consented its implementation should be conditional on the other three projects all being consented with greater certainty over their delivery.

NGET's application for development consent is expected to be made in Q1 2025, followed by National Grid Venture's (NGVs) application for development consent for LionLink anticipated in late 2025. Timescales for the Nautilus project are yet unknown and are dependent on the outcome of the Ofgem consultation. If Nautilus does return to a connection in east Suffolk, it is likely its timescale would be slightly behind those of Sea Link and LionLink.

The case could be made for NGET to delay submission until there is more certainty on the need for reinforcement, and more information known about Sea Link's potential coordination with other projects, particularly offshore wind generation. It is understood this would require an amendment to the currently contracted required installation date.

Moving the DCO submission backwards would allow other NGV projects, specifically LionLink, to catch up to Sea Link and potentially even Nautilus. A delay to submission could then also allow the examinations for Sea Link and the other projects to be coordinated, which could reduce the burden on stakeholders and communities trying to engage with multiple projects and examinations in short sequence.

ESC has previously raised the challenges for communities and stakeholders to engage in examinations for multiple projects either simultaneously or in short order, including the challenge of resourcing engagement in examinations, and consultation fatigue. The examinations for ScottishPower Renewables' East Anglia One North and East Anglia Two offshore windfarm projects were held jointly, in recognition of these challenges and this worked well and was supported by stakeholders.

The need case for Sea Link in relation to potential coordination with offshore wind generation is discussed further in the Changes to the Strategy for Coordination section below.

### **Offshore Coordination Support Scheme**

In ESC's response to the 2023 statutory consultation, ESC questioned the potential implications for Sea Link of coordination with the North Falls and Five Estuaries offshore windfarms, after it was announced on 5 December 2023 that the three projects had been successful in receiving grant funding from the Offshore Coordination Support Scheme (OCSS).

The purpose of the funding from the OCSS was to enable the exploration of coordination between proposed projects to reduce the cumulative onshore and offshore assets when compared to their original radial connection proposals. ESC supported the principles behind this scheme and had hoped that proposals seeking coordination between offshore wind projects and multi-purpose interconnectors would come forward which demonstrated a reduction in the proposed infrastructure. Funding was however awarded to Sea Link, North Falls and Five Estuaries. Given the purpose of the Sea Link project is to provide reinforcement to the transmission network, ESC has raised concern that the connection of generation assets to the project will undermine its original purpose and could consequently trigger the need for further transmission reinforcement. This concern was realised when the East Anglia Study was published by National Grid Electricity System Operator (NGESO)<sup>3</sup>. At present the outcomes of the Offshore Transmission Network Review more generally, and the limitations on the potential benefits from the OCSS due to the project's awarded grants, has been extremely disappointing for east Suffolk. Put simply, the Sea Link project will receive funding to explore coordination with two offshore wind projects which had revised grid connections in Essex and therefore whilst there could be a potential reduction in the projects infrastructure (not taking into consideration the need for further transmission infrastructure) overall the benefits will primarily be felt in Essex, whilst a reduction in infrastructure anywhere is welcomed in principle, it is not evident that there would be any reduction in the onshore infrastructure within east Suffolk.

ESC is also concerned about how any outputs from the OCSS are delivered. The programme for the OCSS outputs does not appear to align with the consenting programmes for the NSIPs involved. Five Estuaries and North Falls have both already submitted their applications for development consent. It is anticipated that Sea Link will submit their application early 2025. The implications for the outputs of the OCSS should be integral to decision making on the projects and should not be considered at a later stage. In addition, the consequences for the decisions made in terms of impacts on transmission infrastructure must also be considered at the same time.

Five Estuaries has not included the necessary infrastructure to enable coordination with North Falls and Sea Link within their application for development consent. They have stated that they will need to seek additional consents. North Fall's development consent application has not yet been accepted by the Planning Inspectorate, and at present it is not known whether their application includes the necessary infrastructure to enable coordination with Sea Link and Five Estuaries.

The purpose of the OCSS was to enable a reduction in the cumulative impacts of the onshore and offshore infrastructure, ESC cannot see how this can be accurately assessed and robustly considered if this matter is not considered holistically within the DCO consenting process.

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<sup>3</sup> [East Anglia study | ESO \(nationalgrideso.com\)](https://www.nationalgrideso.com/east-anglia-study)

If Sea Link were to connect to an offshore platform provided under either the Five Estuaries or North Falls DCO projects (if consented and implemented), ESC would need to understand the implications of this coordination on the Sea Link project, and the need case presented thus far being based on grid reinforcement, instead of connection to new additional generation.

The Project Update document is clear that *“Sea Link is needed because the existing electricity transmission network does not have enough capacity to securely transport all the new energy we expect to connect to the network over the next ten years and beyond”*.

If Sea Link then connects to a new source of offshore wind electricity generation, the capacity of Sea Link for grid reinforcement must then be reduced. As the need case for the Sea Link project has been presented as solely grid reinforcement, ESC would require further information on what this means for the required grid reinforcement if Sea Link’s reinforcement capacity is then reduced.

If Sea Link connecting offshore wind farm projects meant the reduction in grid reinforcement capacity therefore required an additional reinforcement project to meet the required reinforcement need, this would be of particular concern to ESC. The consequential implications for the transmission infrastructure need to be considered at the same time as the proposals for the coordination of Sea Link, North Falls and Five Estuaries.

### **Changes to Permanent Infrastructure: Changes to the Permanent Infrastructure Planned as Part of Sea Link, including Cable Routes and Converter Stations/Substations**

#### *General Comments – Cable Route*

ESC welcomes the realignment of the High Voltage Direct Current (HVDC) cable route near Leiston Road, moving construction activity further away from nearby residential receptors. ESC notes however the cable route remains near some residential receptors, and welcomes all efforts made to minimise the impacts of construction on these nearby receptors.

ESC notes the changes made to the High Voltage Alternating Current (HVAC) cable route including the increase in length by approximately 0.2km, noting the justification provided in the Project Update document is due to the routing of the cables into the converter station at Saxmundham and the Friston substation.

#### *General Comments – Friston Substation*

At the time consent was granted for the ScottishPower Renewables East Anglia One North and East Anglia Two projects, National Grid advised the Friston substation was sized only for those two projects, and no additional projects. Therefore, it was made clear that further projects connecting to the Friston substation would require extensions to be made to the substation.

At Preliminary Environmental Information Report (PEIR) in October 2023, the Project Description stated, *“should the proposed Friston Substation be installed under the current consent secured by SPR, the works required for the Proposed Project [Sea Link] would be limited to the installation of new GIS bays and additional switch gear, cable connections and bus bars, all within the boundary of the substation.”*

It is now understood that NGET proposes to connect the Sea Link project to the Friston substation without needing to extend the substation beyond what was consented for the East Anglia One and East Anglia North projects. ESC would like to understand the rationalisation behind this to understand why Sea Link can now be accommodated without any extensions to the substation.

### *General Comments – Friston Substation, Flood Risk*

The Project Update document states that the land has been added to *'reflect the mitigation works approved under ScottishPower Renewables' existing consent...therefore confirming that this mitigation work will be carried out irrespective of whether it is built under ScottishPower Renewables' or National Grid's application for development consent'*.

The consultation materials confirm NGET will seek development consent for the Friston substation within the Sea Link DCO, and this consultation states the Order Limits have been amended to reflect the mitigation planting secured under the ScottishPower Renewables DCOs, to ensure the landscape mitigation secured under those consents would be delivered by NGET, if NGET was required to build the Friston substation under the Sea Link consent.

The Order Limits have not been subsequently increased to reflect the drainage arrangements secured under the ScottishPower Renewables East Anglia One North and East Anglia Two consents. The flood risk posed to the village of Friston during construction and operation was a matter of great concern for the local community and was raised by multiple stakeholders and Interested Parties in the examinations for the projects. It is vital that the Sea Link Order Limits and DCO reflect the drainage arrangements and mitigation secured under the ScottishPower Renewables DCOs or demonstrate an acceptable alternative solution.

The Examining Authority's Recommendation Report to the Secretary of State noted that a matter of concern throughout the examination was whether enough space had been provided within the Order Limits to prioritise a SuDS strategy for managing surface water, for both the construction and operational phases of the projects. ESC raised particular concern in the examination about the risk of surface water flooding during construction, given the areas used in construction would potentially be far greater than that during operation; large swathes of land would be stripped of topsoil and used for construction purposes including compounds and storage. All of these activities have the potential to increase surface water runoff rates and generate sediment which could have a detrimental impact to surface water flood risk in Friston. Lack of land availability was raised by Interested Parties in the examination as a concern in relation to the deliverability of drainage solutions. The Examining Authority was unable to conclude that the construction drainage scheme would be satisfactory.

Further engagement in relation to this matter is necessary.

### *General Comments – Access to Converter Station*

The consultation documents provide no further justification or information on why the access route to the converter station at Saxmundham has been chosen.

At statutory consultation in late 2023, three access routes were proposed and high-level detail provided to accompany them. ESC responded on the basis of that information, noting limited detail had been provided which limited ESC's ability to respond.

This consultation presents the confirmed proposed access route to the converter station. The Project Update document states: *"Selecting the western construction and maintenance access route means that we have removed the alternative northern and southern access routes from our plans. The southern access route, following further review, is not suitable for the construction traffic required. The northern access route, which is approximately double the length of the western alternative, would have required bridge crossings of the River Fromus and one or both of the railway lines. There are engineering challenges associated with the*

*construction of these bridges, including the likelihood of significant works being required to either the B1121 or the River Fromus itself. Construction work would have also been required in the immediate vicinity of residential properties at Oak Close and along neighbouring streets in Saxmundham. These factors increase the risk of delay and could result in a longer construction period, hence the decision to remove the northern access route from our proposals.”*

No further information or justification for removing the southern access route to the converter station has been provided in the consultation, so ESC is not able to review and consider if those conclusions are accepted or not. The justification provided for the removal of the northern access route notes the engineering challenges of building a bridge over the Fromus and the railway crossing, and the potential for significant works to the River Fromus.

The Fromus crossing on the confirmed western access route will require significant engineering and design work, which presents a substantial challenge to NGET to deliver, and associated expense. As such, ESC needs to see better justification for ruling out the alternative access, noting the delivery of the Fromus crossing will require significant engineering works, and so a comparative analysis would be welcomed.

The Additional PEIR notes potential new significant landscape and visual and heritage impacts of the increased scale of the Fromus crossing. Given the scale of the Fromus crossing known now on the confirmed access route, ESC wishes to see further detail and justification on the discounted alternative access options. The confirmed western access has the potential to create significant environmental, landscape, and heritage issues. ESC requests further information on the discounted alternative routes to better understand why the western access route has been chosen, with the opportunity for ESC and other stakeholders to comment on.

ESC request NGET consider alternative routes to the three considered thus far to explore whether an alternative route is possible which does not cross the Fromus.

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

#### *General Comments – Pylons*

In the plan on page 15 of the Project Update document, it appears there are approximately 9 pylons, shown as ‘proposed pylons’. An annotated tab on one of the pylons notes confirmation of the temporary pylon works near Friston, if built as part of Sea Link and not under the ScottishPower Renewables consent for East Anglia One North and East Anglia Two. No further information on the ‘Proposed Pylons’ is provided in this consultation, and it is not clear if they are intended as realigned reconducted pylons, additional new pylons, or something else. It is also not clear in the consultation documents if the modifications to the pylons are intended to be carried out on one or both circuits of the pylons.

The original PEIR at statutory consultation stated the following at 1.4.2.12 *“Delivery of the Friston Substation would also require the removal of one existing 4ZW 400 kV overhead line pylon, and installation of two new pylons on the 4ZW 400 kV overhead line. It could also include the re-conductoring of a short length of the 4ZW 400 kV overhead line and minor alterations to the pylons approaching Friston Substation.”*

The General Arrangement Plans (Sheet 3 of 7) notes multiple areas of access in the Order Limits required for access to existing pylons for modification works.

ESC wishes to better understand the need for works to be done to the pylons. Clarity on the reconductoring of the pylons in relation to the plans presented in this consultation would be welcomed, and further detail of the modification works proposed.

#### *Landscape and Arboriculture*

The alterations to the cable route north of Aldeburgh are noted and ESC anticipates that all previously submitted responses regarding assessments of impacts on hedgerows, trees, and other elements of the landscape's makeup and key characteristics will remain applicable. As previously, these should be subject to full survey assessments to provide an understanding of likely impacts and their extent and magnitude of importance. The Council expects that affected hedgerows will be assessed against the criteria of 'Importance' set in the 1997 Hedgerow Regulations, and that affected trees will be assessed against the guidance contained in BS5837:2012 trees in Relation to Design, Demolition, and Construction.

Paragraph 1.7.6 of the Additional PEIR states that while the majority of changes to the proposals are not considered to introduce new or different significant effects, but the *"increased scale of the bridge across the River Fromus"* could introduce new or different significant effects.

Paragraph 1.7.11 goes on to say the *"the removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity."*

In regard to effects during construction, paragraph 1.7.12 concludes that *"The original PEIR reported a preliminary medium magnitude of effect and a significant adverse effect at construction within LCA B4: Fromus Valley. Due to the increased scale of the bridge over the River Fromus, the increased construction activity and associated vegetation removal, has the potential to have a higher magnitude of effect on the LCA. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is a special quality and feature of the LCA. The increased scale of the bridge would result in further plantation vegetation removal and whilst this is expressed as positive for the LCA within the published assessment, the removal of the mature woodland vegetation along a section of the River Fromus, would alter the vegetation network, which is stated in the published assessment as contributing to the natural heritage value of the LCA. The effects to the LCA would remain as a significant adverse effect, as reported within the original PEIR."*

Paragraph 1.7.16 goes on to say, in relation to operation: *"the original PEIR reported a preliminary medium magnitude of effect and a significant adverse effect at operation within LCA B4: Fromus Valley. Due to the increased scale of the bridge, there is the potential to have a higher magnitude of effect on the LCA as a bridge of this footprint and height would remain an incongruent feature within the local landscape even once the mitigation planting is established. The removal of vegetation would permanently alter the vegetation network along the River Fromus which contributes to the natural heritage value of the LCA. Landscape planting around the bridge would assist in lessening this effect in the long-term. This would be within the setting of Hurts Hall and within the parkland landscape, which is a special quality and feature of the LCA. The effects to the LCA would remain as a significant adverse effect, as reported within the original PEIR."*

On the modified western access route to the converter station site at Saxmundham; there can be no further response on this route until the developer has submitted a preliminary tree survey and arboricultural Impact Assessment for the trees adjacent to the River Fromus. It can only be when such studies have been carried out that it will be possible to understand if the latest proposed alignment of the Fromus crossing is feasible in respect of adverse impacts on existing trees. The PEIR reported that the Fromus crossing proposals are



likely to result in significantly adverse landscape and visual effects and that the latest revisions to the crossing proposals are likely to also result in significant adverse effects. However, the full magnitude of such effects remains currently unknown and the Council reserves the right to comment further when the full magnitude of these effects is fully understood. From its own on-site observations, the Council considers that there are potentially un-mitigatable effects that could arise from the latest western access alignment. The revised Order Limits in this area are noted.

Paragraph 1.7.7 of the Additional PEIR states that the proposed bridge across the Fromus would be located through existing plantation woodland. This is only partly true in respect of the latest and revised crossing point which appears to be adjacent to long term mature trees, one of which shows unusual and exceptional qualities for its species. No further consideration of this crossing option can be made without a preliminary tree survey and Arboricultural Impact Assessment. Paragraph 1.7.11 notes the assumption that mature 'woodland' will be removed as well as plantation trees. At this stage the Council does not consider that the removal of mature non-plantation trees at the crossing point is acceptable.

The Council reserves the right to review and revise its opinion on the predicted magnitude of landscape and visual effects as the project evolves and at this stage does not necessarily accept the currently presented preliminary assessments.

ESC is aware of significant concerns in the community about the potential loss of veteran trees and ancient woodland, particularly around the Saxmundham converter station site and Fromus crossing.

#### *Ecology and Biodiversity*

The proposed amendments to the River Fromus crossing are noted. It is understood that the increase in bridge height has been proposed in response to concerns raised by the Environment Agency in relation to potential impacts on aquatic invertebrates, and that the relocation of the crossing further north is due to flood risk concerns. Whilst in principle design changes to improve the function of the crossing for aquatic invertebrates may be welcomed dependent on impacts on other receptors, the Additional PEIR conclusion that these changes could result in other significant adverse ecological effects (paragraph 1.7.30) is agreed with. Further consideration and assessment of this crossing option, including whether any satisfactory alternatives exist, is necessary.

In addition to the potential impacts identified from this crossing option as part of the PEIR and Additional PEIR, the proposed crossing relocation also places the structure in an area where there is the potential for it to have significant adverse impacts on veteran (and possibly ancient) trees, including a horse chestnut tree immediately to the south-east of the crossing site. This tree, along with other nearby oak trees, does not appear to have been identified as part of the Phase 1 habitat survey work submitted as part of the PEIR consultation. It does not therefore appear that it has been given appropriate consideration in the selection of the currently presented crossing option. It is essential that its ecological value is fully assessed before any crossing option is confirmed to avoid any significant adverse impact on it.

#### *Cultural Heritage*

On the design of the proposed Fromus crossing, the indicative bridge designs show that there is a significant difference between a bridge with 4m clearance over the river and a bridge with 2m clearance. The scale of the slopes up to the 4m clearance bridge would be substantial, which could affect landscape mitigation and its efficacy. Photomontages should show the potential visual impact of the bridge on the setting of Hurts Hall, with and without landscape mitigation planting.

As the proposed bridge would be permanent in this sensitive landscape, it should be designed rather than be purely utilitarian, and should be visually recessive. It should not be a pastiche of any historic bridge type. A simple contemporary design that aims to reduce its visual prominence would likely be most appropriate.

Section 1.7.42 of the Additional PEIR states *“The proposed bridge crossing required for the access road to cross the River Fromus has the potential to result in an increased impact on the setting of Hurts Hall, a Grade II listed building. This, however, should be limited as a result of existing retained tree cover as well as the distance between the proposed bridge and Hurts Hall. It is therefore, not likely to result in a significant adverse effect, but this will be kept under review and assessed within the ES as more design details emerge.”*

The visual impact of the proposed permanent access and crossing over the River Fromus, including any proposed landscape mitigation, should be shown through photomontages from Hurts Hall and toward Hurts Hall from the west.

The adopted Saxmundham Neighbourhood Plan repeatedly emphasises the importance of Hurts Hall in views around Saxmundham<sup>4</sup>. Paragraph 11.28 of the Neighbourhood Plan reiterates the importance of Hurts Hall as a landmark, stating the *“transition between rural landscape character and the urban form of the edge of the town is important not only for its landscape value appearance but because of the visual gateway it provides to the appearance of the edge of the town. Land to the south of the town and east of the B1121 with views to Hurts Hall and the town beyond was identified as sensitive by the Suffolk Coastal Settlement Sensitivity Assessment, which was undertaken to support the [Suffolk Coastal] Local Plan.”*

An important element of the views around Hurts Hall from the B1121 is stated to be the panorama of open farmland in the foreground with Hurts Hall in middle distance. Policy SAX12: Gateways, Views, and the Landscape Setting of Saxmundham seeks to protect the scenic value of the landscape and countryside in the parish outside the defined settlement boundary of the town from development which may adversely affect this character. It goes on to say development which would have an unacceptable adverse impact on the landscape or character of the view concerned will not be supported, including in views from the B1121 looking across to Hurts Hall.

The proposals for the converter station site and associated Fromus crossing have the potential to significantly affect these views, contrary to the aims of the adopted Saxmundham Neighbourhood Plan.

The Environmental Statement (ES) should take into consideration the impact of the increase in the Order Limits to the west and south of Hurts Hall. Historic mapping from 1903, ten years after the Hall was built, show a tree belt only around the ancillary buildings and gardens of Hurts Hall, leaving the western and southern elevations of the Hall as the principal outward facing aspects. The landscape setting around the Hall changed throughout the 20<sup>th</sup> century, with more or less tree planting around the Hall at different points in time, and the formal gardens and lawn to the west and south of Hurts Hall are 21<sup>st</sup> Century additions. However, this does not discount the historic and current importance of the western and southern aspects of Hurts Hall. Both the views toward the Hall from the west and views from the Hall to the south make important contributions to its significance. Any landscape mitigation or environmental enhancements that result in screening of Hurts Hall in views from the west would detract from its significance. Landscape mitigation around the proposed bridge could help screen the bridge in views from Hurts Hall, but this screening in itself would likely become a visual barrier in an open landscape setting.

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<sup>4</sup> [Saxmundham NP Adopted July 2023 \(eastssuffolk.gov.uk\)](https://eastssuffolk.gov.uk)

### *Environmental Protection*

In relation to changes to the cable route, there do not appear to be any significant implications based on the limited information provided. All changes will need to be fully assessed in relation to noise and vibration, air quality, and dust and light as necessary.

It is agreed that the proposed changes in route and siting are unlikely to significantly impact on the overall air quality emissions or dust generation of the project, although low level dust nuisance may still occur and as such Sunday and bank holiday working should be avoided. Both emissions from transport and Non-Road Mobile Machinery (NRMM), and dust assessment and mitigation are scoped in for further assessment. As such ESC's previous comments at statutory consultation stand and should be referred to for detail.

ESC would also like to highlight to the applicant the potential presence of private water supplies. Much of the cable route crosses rural Suffolk and it is likely that private water supplies will be present. The applicant will need to consider the risk to private water supplies.

ESC notes the position of joint bays indicated on the General Arrangement Plans. NGET will need to carefully consider the siting of the joint bay locations, particularly in relation to residential properties. The potential impacts on residential receptors from associated noise, dust, vibration, light, etc. will need to be considered. As a general principle, every effort should be made to locate the joint bays as far away from residential properties as is reasonable and practicable. ESC expects to see appropriate mitigation where this is not possible, or where impacts arise that were not expected or where impacts prove worse than expected.

ESC notes the absence of cable sealing end compounds in the consultation material. Should this change, ESC would expect every effort to be made to avoid locating the cable sealing end compounds near residential receptors, and the appropriate mitigation provided where necessary.

### *Socioeconomics and Tourism*

In relation to the amendments and increases made to the Order Limits, ESC remains concerned about the potential for adverse socioeconomic impacts on individual economic receptors, especially those located within and adjacent to the draft Order Limits.

ESC would expect to see that the impacts on individual receptors including farms and businesses directly affected by the changes be appropriately mitigated and compensated for where appropriate, to mitigate any potentially adverse socioeconomic impacts.

### **Changes to Construction and Maintenance Work: Proposed Changes to How NGET Would Build and Maintain Sea Link in Construction and Operation**

#### *General Comments – Construction Compounds*

ESC notes in the Project Update document that the construction compound east of Friston at the substation site has been moved from south of the HVDC cable route to the north of the cable route, noting the document states this change moves the compound further away from Friston.

The relocation of the compound east of Friston now places it in close proximity to the Order Limits for the East Anglia One North and East Anglia Two projects. Coordination between Sea Link and the ScottishPower Renewables projects in relation to this location where there is a potential pinch point of close geographical overlap and potential programme overlap is therefore vital.

ESC also notes the update for the converter station site from the Project Update document; *“reducing the number of construction compounds within the Saxmundham converter station site from two to one. The single compound would be located further west within the converter station site area, reflecting ongoing discussions around coordination with other projects”*. ESC welcomes NGET forward planning the construction of the converter station site as to not preclude coordination with NGV projects. However, it is noted that ESC’s expectations for co-ordination go beyond one project simply not precluding the delivery of another project. Further details on changes to the approach to coordination are discussed in the relevant section below.

Whilst ESC welcomes the refinements to the construction compounds it is essential that these remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to be provided to protect the amenity of nearby receptors.

Two construction compounds to the west of the converter station site were proposed at the previous statutory consultation, which has been consolidated into one larger compound to the west of the site. This consolidation and move to the west places the construction compounds in closer proximity to residential receptors including Wood Farm, and nearer to Hurts Hall.

#### General Comments – Construction Access to the Converter Station Site

It is again important to stress that the converter station site is also likely to host converter stations for NGV’s LionLink and Nautilus projects (should Nautilus progress with a connection in east Suffolk), should both be consented. Given the close timescales the projects may be delivered on, ESC would welcome efforts to coordinate construction accesses to the converter station site, prior to the main permanent access being constructed. Coordination of construction accesses for three projects could reduce the environmental impacts of the projects, compared to each project bringing forward similar routes to the converter station site.

#### *Ecology and Biodiversity*

ESC notes that a refinement to the construction compound on land south of North Warren RSPB Reserve reduces the size of the compound and moves it further from the RSPB Reserve, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Sandlings Special Protection Area (SPA) (paragraph 1.7.27). The paragraph goes on to conclude that this change, *“coupled with noise and visual mitigation measures, would address the disturbance impact on these designated sites identified in the original PEIR and render it to be non-significant.”* However, the paragraph also notes that the noise modelling which supports this conclusion is yet to be provided and will be made available with the ES at DCO submission. Whilst in principle the reduction and relocation of this construction compound to help address potential impacts on the designated sites is welcomed, in the absence of the results of the noise modelling assessment and details of the proposed noise and visual mitigation measures we do not agree that at this stage it can be concluded that impacts from these sources would “non-significant”.

#### *Environmental Protection*

ESC has previously stated Saturday afternoon working hours are not acceptable, as was proposed in the Code of Construction Practice at statutory consultation. Section 1.10 of the Additional PEIR sets out the intended extending working hours for the onshore scheme. The consultation now states *“The proposed core working hours set out at our statutory consultation did not include Sundays or bank holidays. However, to accommodate contractor requirements, and to give us the flexibility to deliver the construction programme on time, we have identified a need to include 7am to 5pm on Sundays and bank holidays within the core*

*working hours. Whilst this change would give us the flexibility to carry out works when and where needed, we do not expect construction activity to take place on every Sunday or bank holiday. There will be restrictions on the type of activity that can occur on these days”.*

ESC has previously raised significant concerns about the proposed working hours. In the recent statutory consultation, ESC raised concern about the use of Saturday afternoons within the core hours.

This project update retains Saturday afternoon in the core hours, and additionally now includes Sundays and bank holidays within the core working hours. The justification given for this is contractor requirements and the need to maintain flexibility in construction programme. The Project Update Document notes that NGET does not expect construction activity to take place on every Sunday or bank holiday.

No caveat is made within the Project Update Document or the Additional PEIR about the circumstances which would require the additional working hours on Sundays or bank holidays, or the types of works likely to be carried out on these days. The justification is given as contractor requirements and the need to retain flexibility in construction period again raises significant concern.

ESC accepts certain activities like concrete pours or dewatering require uninterrupted prolonged periods of working. There are multiple NSIP construction programmes already happening and more programmed to happen in east Suffolk, and precedent has been set by other projects in regard to core working hours, and mechanisms for agreement of additional working hours. ScottishPower Renewables’ East Anglia One North and East Anglia Two offshore windfarm projects do not include Sundays or bank holidays in their core working hours, nonetheless the DCO includes a mechanism for additional working hours to be agreed in advance with ESC.

In ESC’s statutory consultation response, the following was stated in relation to working hours:

*“Construction noise LOAEL and SOAEL have been set in accordance with these thresholds and in terms of Weekdays 7:00am to 7:00pm, and Saturdays 7:00am to 1:00pm this appears reasonable, Table 2.10.8 also contains thresholds for other periods, and it is assumed that these are present to govern either emergency works or where the local planning authority has granted permission to work beyond the consented working hours.*

*In terms of working hours, the outline code of construction practice (OCoCP) states the following;*

*The proposed construction working hours are:*

- *Monday – Friday: 07:00am–19:00pm.*
- *Saturday: 07:00am–17:00pm.*
- *Sundays/Bank Holidays: non-working.*

*We do not currently consider Saturday afternoon to be acceptable and precedent has been set in respect to a similar project (requirement 23 for EA1N and 2) for Saturday to be 07:00-1300 and this should be applied here. Work outside these hours should be agreed with the Local Planning Authority and be of the type listed for this purpose in the OCoCP.”*

These comments remain and apply to the inclusion of Sundays and bank holidays in the core working hours too. Further precedent in terms of the Sizewell C Associated Development sites construction working hours

excluding Saturday afternoons, Sundays, and bank holidays should be considered. If ESC were to accept this proposal, these works would be heavily restricted to inaudible, non-dust generating zero impact works, but our clear preference is for Sea Link's core working hours to be in line with other comparable projects. If flexibility is required outside of the approved working hours this can be subject to a formal request and approval process with ESC as with other comparable projects. The applicant states that not all Sundays and bank holidays will be required therefore this should provide adequate flexibility with good work planning. This will require further discussion with ESC.

Residents require respite from these works especially given the number of projects in the district and BS5228 needs due regard in this respect. It is again important to note that east Suffolk is home to multiple consented, planned, and known NSIPs and there will be overlap in construction periods between projects. This is discussed further in the mental health and wellbeing section below.

*Section 1.10.5 of the Additional PEIR states "for Noise and Vibration, there are potential implications arising from extending the construction working hours, but they are not expected to alter the conclusions in the original PEIR. Sundays and bank holidays are regarded as more sensitive than weekday daytime periods and therefore works during these periods are more likely to exceed noise threshold levels. Construction activity is not anticipated to take place regularly on Sundays and bank holidays and has been included to provide flexibility to carry out works when and where they are needed. Therefore, Sunday and bank holiday working is generally expected to be less intense than works at other times (e.g. during the week), and subject to restrictions where required, including a commitment for no percussive piling during these periods. Consideration of the higher sensitivity of these time periods will also factor into the contractor's consideration of best practicable means (BPM) to reduce the effects of noise and vibration. Although there is a greater likelihood for exceedance of threshold noise levels during these periods, the temporal threshold for significant effects is not likely to be exceeded at any receptors due to the extended working hours where BPM are employed to reduce the effects of construction noise and vibration. Additional significant adverse effects are therefore not expected. The ES will include an assessment of potential noise and vibration impacts during the extended construction working hours."*

In the absence of a detailed proposal and an adequate assessment of potential noise and vibration ESC cannot accept these conclusions, particularly as a large amount of assumption and wiggle room has been introduced in the small amount of information given.

The applicant is correct to identify these times as more sensitive as supported by relevant standards, guidance, and policy but fails to recognise the character of the area in which they are working in respect to their determination of significance and the need for residents impacted by long term construction noise to have some respite from it.

Although the Additional PEIR and Project Update Document state that not all Sundays and bank holidays will be worked, the fact is that if this is accepted, contractors can and if needed likely will work on Sundays and bank holidays.

Other comparable projects have built in flexibility for the infrequent additional working hours; mechanism built around seeking approval for specific works outside the core working hours with the local authority, with clear and adequate justification provided as to their necessity.

ESC notes the NGET's use of BPM to ensure that the impacts will be managed but NGET should also be aware that undertaking works at appropriate times forms an important part of BPM. An important element to consider is whether Sunday and bank holiday Monday working is BPM, in its own right.

In Table 1.1 of the Additional PEIR, it is stated in relation to noise and vibration that *“Noise and Vibration There are no major changes to the existing baseline within the draft Order Limits or potential new types of impacts introduced as a result of the design changes, when compared with that presented in the PEIR. Although in certain cases, the reduction in the area of the draft Order Limits and the removal of several access points has meant that some sensitive receptors are now located further from the Proposed Project. For instance, the HVDC cable route near Leiston Road has been moved further from nearby residential properties. The removal of the option of the northern access S-BM12 also avoids the need for construction vehicles to use the B1121 Main Road to the north of Saxmundham, therefore, reducing noise impacts from construction traffic for receptors in the vicinity of that access route. Any change in construction traffic and construction noise and vibration levels introduced by the design changes is limited and not likely to result in significant effects. With the implementation of the best practice measures set out within the Outline CoCP, it is considered that the design changes proposed would result in similar effects as those presented in the original PEIR during all phases of the Proposed Project, with no likely significant effects as a result of noise and vibration.”*

This does not address the impacts associated with the proposed changes to working hours which could be very significant dependent on the details of the proposed changes.

The community newsletter identifies a number of changes but does not mention the changes in working hours to include Sunday and bank holiday working hours to be core hours beyond stating, “changes in working hours” under the banner “smaller changes”. There is a distinct potential for this to be a significant change pending the actual detail of what is being proposed and this should either be highlighted or a more fully detailed proposal given to allow people to adequately comment.

On cumulative effects, the Additional PEIR states *“Suffolk Onshore Scheme Intra-Project Cumulative Effects: Given the conclusions of the above technical assessments, no new or different likely significant intra-project cumulative effects have been identified compared with those included in the original PEIR.*

*Suffolk Onshore Scheme Inter-Project Cumulative Effects No new or different significant effects have been identified compared with those included in the original PEIR. As noted in paragraph 1.4.1 above, the consideration of the combined impacts of the Proposed Project together with LionLink and Nautilus will now be assessed within the cumulative effects assessment in the ES, in line with the cumulative assessment undertaken for any other cumulative development. This means that the magnitude of some of the effects presented in each topic chapter within the original PEIR may be reduced where co-location is no longer considered, with effects being attributed instead to LionLink and Nautilus, as relevant, in the inter-project cumulative effects assessment. The overall cumulative effect of Sea Link with these other projects is anticipated to remain the same as presented in the original PEIR.”*

If this project is seeking longer 7-day week core working hours, then there is a potential to impact on cumulative effects, particularly given it is likely that the LionLink and Nautilus projects will request the same core working hours. Without proper consideration and assessment, it is not possible to dismiss impacts in the way the Additional PEIR seeks to do.

In the Additional PEIR Executive Summary, the following is stated: *“Extended Working Hours for the Onshore Scheme:*

*1.3.17 In terms of traffic and transport, the proposed extended working hours have the potential to result in significant adverse effects if unmitigated and without restrictions. Further details of the anticipated frequency of traffic movements on Sundays and bank holidays are to be confirmed, and because baseline traffic volumes*

*are generally lower on a Sunday the potential for significant adverse effects as a result of a higher proportional uplift in traffic levels cannot be ruled out at this stage. Sunday and bank holiday working will be subject to further consultation with the local authorities. To mitigate the potential for adverse effects, restrictions and other measures will be applied where required and included as part of the Outline Construction Traffic Management and Travel Plan. The ES will include further details of anticipated vehicle movements on these days with these mitigation measures applied. –*

*1.3.18 For the socio-economics, recreation and tourism and the health and wellbeing assessments, these extended working hours have the potential to result in significant adverse effects to PRow if unmitigated and without restrictions. Sundays and bank holidays are typically days where residents and visitors are more likely to frequent recreational PRow. Therefore, there may be greater adverse effects on receptors accessing these recreational PRow. Further details of the anticipated construction activities on Sunday and bank holiday are to be confirmed, and therefore the potential for significant adverse effects cannot be ruled out at this stage. Sunday and bank holiday working will be subject to further consultation with the local authorities. To mitigate the potential for adverse effects, restrictions and other measures will be applied where required.”*

Traffic and transport and Public Right of Ways (PRow) are not the only matters that could be significantly affected if Sunday and bank holiday working is to be proposed depending on the detail of that proposal. The fact that traffic and transport have been identified to have the potential to have significant adverse effects would suggest the works being proposed are not insignificant and therefore are likely to have implications in terms of noise and vibration, air quality and dust, and potentially light depending on the season as well, as other environmental protection matters. ESC has significant concerns in respect of these proposals particularly due to the narrow scope of potential impacts that have been identified in the consultation material. To clarify, in the event ESC were to accept any proposal such as this it would be highly restrictive in terms of the work being inaudible, non-dust generating, zero impact work, which would include traffic and vehicle movements on and off site.

Other comparable projects have agreed flexibility to work outside the approved hours by seeking agreement with ESC as the Local Planning Authority, which allows us to be confident the works are necessary and are being undertaken to BPM. Given that it is stated in the consultation material that there will not be a requirement to work every Sunday and bank holiday, it is likely this will be a workable solution and could be offered subject to further information being provided and discussions with the applicant. For the avoidance of doubt ESC's current position is that this includes Saturday afternoons as well.

The Project Update Document and Additional PEIR identify the refinement and reduction in size of three of the construction compounds. ESC is supportive in principle of the reduction and refinement of the compounds to subsequently lower their environmental impacts. The compounds will still require adequate assessment in terms of potential impacts to nearby receptors and mitigation as appropriate. ESC looks forward to seeing further detail on the construction compounds and providing feedback.

Further information is required on the changes proposed, and adequate assessment of impacts to any nearby receptors and where applicable, the wider area (in respect to areas like air quality), will be required.

#### *Coastal Protection*

ESC welcomes the proposals to use trenchless construction methods to install cables near the Aldeburgh SSSI, and the trenchless 'underground cable construction methods' proposed for the cable landfall point between Aldeburgh and Thorpeness, as this method minimises disturbance of beach material. We request



further information on the detail therein and would like NGET to confirm to what extent this method would avoid alteration to the beach profile i.e. morphological changes to beach height across and/or along shore.

From a coastal processes and protection perspective, the reduction of the size of the construction compound at the landfall is welcomed, as a reduction in size lessens the impact of the compound on the flood zone.

Should this landfall also be identified as a preferred location for other NSIPs ESC would expect NGET to consider measures to coordinate the works to lessen the impact to this section of coastline.

#### *Socioeconomics and Tourism*

ESC is concerned about the impact of the additions of Sundays and bank holidays to the core working hours in relation to socioeconomic activity, specifically east Suffolk's tourism industry.

Whilst NGET states that construction activity is not expected to take place on every Sunday or bank holiday, ESC remains concerned that this could be a possibility and we refer back to the comments made previously within this response.

Weekend and bank holiday visitors are an important contributor to the visitor economy in east Suffolk, and ESC is concerned that the extended hours of construction could affect the visitor experience locally. The proposed changes to working hours during the construction phase have the potential to exacerbate possible adverse impacts on the visitor economy, especially visitor perception and quality of experience.

#### *Mental Health and Wellbeing*

In relation to the increased core working hours including Sundays and bank holidays, and retaining Saturdays, as discussed above it is important to stress that increases in working hours can have potential significant adverse effects on people's health and wellbeing.

ESC has continually stressed east Suffolk is home to multiple consented, planned, and known NSIPs and there will be temporal and spatial overlap in the construction phases of these projects, which can compound the effects on people's health and wellbeing.

Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is as important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are often expected to be reprieves from construction working.

Residents require respite from these works especially given the number of projects in the district and BS5228 needs due regard in this respect. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being consulted on, consented, and constructed across the same communities.

The Additional PEIR concludes no change is expected for health and wellbeing in terms of any new or more adverse significant effects when compared to the original PEIR. There is no discussion in the Additional PEIR about the impacts of the extended core working hours on mental health and wellbeing. Given the potential construction works which could take place on Saturday afternoons, Sundays and bank holidays ESC does not consider this conclusion is justified.

ESC would welcome further discussion about the project's impact on mental health and wellbeing, including discussions on how to mitigate and compensate impacts where appropriate.

## **Changes to Mitigation, Enhancements, and Approach to Biodiversity Net Gain: Proposed Changes to Environmental Mitigation, and Delivery of Enhancements to the Local Environment**

### *Ecology and Biodiversity*

As identified in paragraph 1.7.21 of the Additional PEIR, the results of the vast majority of the required ecological surveys are yet to be provided as surveys are still underway. In the absence of these results, it is not possible to provide detailed comments on the proposals, and it remains concerning that significant design and layout decisions are being made and committed to in the absence of all of the necessary ecological information and assessment.

In addition to the above commentary in the Changes to Construction and Maintenance on impacts on the Sandlings SPA as a result of the changes to the construction compound, paragraphs 1.7.26 and 1.7.28 of the Additional PEIR also refer to the creation of an area of acid grassland north of the A1094. It is understood that this habitat creation is in part intended to address temporary construction impacts on foraging Sandlings SPA bird species (Woodlark and Nightjar) arising from the construction compound on land south of North Warren RSPB Reserve. Whilst the applicant's attempts to address this impact are welcomed, it is unclear what the justification is for using this area of land for this purpose. Although it is adjacent to an area of acid grassland mosaic habitat (part of the Aldeburgh Golf Course County Wildlife Site (CWS)), it is approximately 1.6km from the part of the Sandlings SPA closest to the construction compound. If this area is to be relied upon for addressing impacts on SPA/SSSI feature species, then sufficient evidence as to its suitability and likely success will need to be included as part of the ES and Shadow Habitats Regulation Assessment (HRA), as will proposals to monitor its effectiveness during the development construction phase. Any habitat creation or enhancement must be carried out as early as possible during the project programme, to ensure that mitigation or compensation habitats are provided ahead of impacts occurring.

### *Cultural Heritage*

On the increased Order Limits around the western access to the converter station site, the proposed Order Limits now include a large section of land along the banks of the Fromus, as well as a section of land next to the western boundary of Hurts Hall, for environmental mitigation and enhancements. The addition of any planting mitigation that fully screens Hurts Hall from the west would be considered to detract from its historic significance (as discussed above in the changes to permanent infrastructure section). It is therefore essential that impacts on the setting of Hurts Hall from landscape mitigation proposals are fully taken into consideration and any impacts identified and balanced against the landscape benefits.

### *Environmental Protection*

There is an emphasis on reducing impacts to the natural environment and mitigation in that regard, such as the provision of Biodiversity Net Gain (BNG). Whilst this is supported, it is of the utmost importance that the impact to residents needs to be treated as an equally significant priority. Residents are a part of environmental mitigation as much as any other aspect and provision of things such as BNG should not overshadow the importance of and impact to people.

## **Changes to the Strategy for Coordination: Proposed Changes to Coordination of the Construction and Operation of Sea Link with Other Planned Projects in Suffolk**

ESC would like to be supportive of well-developed and designed coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPSs) and recent national policy. This however is not currently the case, multiple projects planned to be delivered in a piecemeal fashion with little regard for the cumulative impacts, which cannot continue to occur at the expense of Suffolk's environment and communities.

Sea Link as a project is not being developed in isolation; it is under the National Grid umbrella with NGV bringing forward the LionLink and Nautilus interconnector projects, as well as other NSIPs including the consented new nuclear power station Sizewell C and multiple offshore wind projects. Sea Link is one of a succession of projects which will impact the same communities already affected by multiple other NSIPs. This does not include the multiple other NSIPs proposed within the wider Suffolk area.

It is therefore imperative that projects seek all opportunities to coordinate with other projects. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.

ESC's requirement for the Sea Link project to coordinate with other known projects has been repeatedly and consistently emphasised in all consultation responses. Within this, ESC has repeatedly stressed that coordination is considered to be more than just co-location; it is essential that there is a reduction in the disruption and environmental impacts as a result.

To reduce the degree of disruption experienced by local communities and the adverse impacts on the environment, the delivery of Sea Link should be coordinated with other projects being delivered in the locality. As stated above, coordination should reduce the adverse impacts of the project, so in the event all the known planned projects receive consent, east Suffolk avoids being put in a situation where each project is delivered independently and sequentially, with the construction effects being elongated and experienced over many years by local communities and the environment.

NGET's intention to work with NGV to develop a coordinated approach to the development and delivery of the Nautilus and LionLink projects should be welcomed. However, intentions are expected to be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on environmental, residential, and socioeconomic receptors within east Suffolk.

On cable corridors and landfall, the project update document states *"For the direct current (DC) cable route, this reflects the fact that LionLink no longer prefers the Aldeburgh landfall and onward cable route. For the shorter alternating current (AC) route, the Sea Link design has been refined to remove the LionLink cables to allow NGV, whose project is at an earlier stage, to fully consider and consult on the most appropriate AC cable route. Nonetheless, Sea Link has been designed to allow space for the future delivery of other projects."*

On converter stations the same document states *"We have confirmed the preferred location of the Sea Link converter station within the wider site, and refined the draft order limits to remove the areas that may be required for the future NGV projects' converter stations. However, one of the reasons that the Saxmundham site was identified was because of its capacity to accommodate further converter stations, and we continue to work collaboratively with NGV to consider the most appropriate way of developing the wider site in a coordinated way."*

The additional PEIR states the methodology for the additional PEIR used is the same as that of the statutory consultation PEIR, noting *“The exception to this is the assessment of colocation with the two National Grid Ventures projects, LionLink and Nautilus, in Suffolk which is no longer embedded as an assessment scenario within the main assessment of the EIA. This is because whilst the Proposed Project continues to allow space in the surrounding area for the delivery and potential co-location of key infrastructure associated with these projects (converter stations at Saxmundham and cable corridors), the draft Order Limits have been narrowed such that they no longer encompass the land necessary for those proposed projects. The reasons for this are explained in Section 4: Our Proposals of the Project Update Document. The assessment of the combined impacts of Sea Link, LionLink and Nautilus will be considered within the cumulative effects assessment to be presented in the ES and will be reliant on the information available for those two other projects at the time of assessment, in line with the methodology for assessing other cumulative developments.”*

The additional PEIR goes on to say *“No new or different significant effects have been identified compared with those included in the original PEIR. As noted in paragraph 1.4.1 above, the consideration of the combined impacts of the Proposed Project together with LionLink and Nautilus will now be assessed within the cumulative effects assessment in the ES, in line with the cumulative assessment undertaken for any other cumulative development. This means that the magnitude of some of the effects presented in each topic chapter within the original PEIR may be reduced where co-location is no longer considered, with effects being attributed instead to LionLink and Nautilus, as relevant, in the inter-project cumulative effects assessment. The overall cumulative effect of Sea Link with these other projects is anticipated to remain the same as presented in the original PEIR.”*

At the statutory consultation stage, a PEIR was presented which included the possibility for Sea Link to lay cable ducts for the other known projects looking to co-locate infrastructure with Sea Link.

The changes to the coordination strategy as presented now effectively remove the potential for meaningful coordination with the forthcoming NGV projects. The Project Update document states *“For the direct current (DC) cable route, this reflects the fact that LionLink no longer prefers the Aldeburgh landfall and onward cable route. For the shorter alternating current (AC) route, the Sea Link design has been refined to remove the LionLink cables to allow NGV, whose project is at an earlier stage, to fully consider and consult on the most appropriate AC cable route. Nonetheless, Sea Link has been designed to allow space for the future delivery of other projects.”*

ESC does not consider genuine coordination to simply be not precluding future projects from coming forward by leaving physical space at landfall and along the cable route. Genuine coordination should seek to reduce the environmental, community, and socio-economic impacts of multiple projects coming forward at similar timescales and in similar geographical areas.

The consultation material makes it clear that NGET’s decision to exclude cable ducts and infrastructure associated with NGV’s projects therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and Sea Link. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between Sea Link and the NGV projects will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV’s assessments of the best cable route will be similar to those reached by NGET.

ESC would like NGET to consider the potential to coordinate construction compounds across projects, looking to share compounds with the NGV projects.

ESC considers one significant area remaining for coordination is in relation to the AC cable route between the converter station site at Saxmundham and the Friston substation. If NGET laid cable ducts for another project at the same time as laying the ducts for the Sea Link project, this could meaningfully reduce the environmental impacts of both projects.

ESC considers the cable ducts on the AC cable route from the Saxmundham converter station to the Friston substation should be shared.

If NGET lays cable ducts for the Sea Link project alone, it becomes more difficult for NGV to align their ducts for the LionLink project (and Nautilus, if the project returns to Suffolk) as once the cables have been laid, exclusion swathes will be implemented that mean future projects will be forced to locate their cables a greater distance away. AC cable widths are significant. Promoters laying cable ducts only for their own project in isolation means each successive developer will have to work around the cables and ducts already laid and the exclusion swathes associated with them. The end result is a much wider cable swathe with successive impacts of construction on the environment and local communities.

By laying cable ducts for another project at the same time as laying the cable ducts for Sea Link, NGET facilitates coordination with other projects in a way that can meaningfully and substantially lessen the environmental and community impacts of the projects.

This is a particular concern around the Friston substation, for cable routes leaving the Saxmundham converter station and heading to the Friston substation. An uncoordinated and piecemeal approach to the cable ducts associated with Sea Link, LionLink, and potentially Nautilus could result in multiple separate cable routes entering the Friston substation site subsequently adversely affecting and removing the agreed mitigation planting around the Friston substation. The mitigation agreed under the East Anglia One North and East Anglia Two projects was required to mitigate the impacts of the substation on Friston, and a key element of that mitigation is landscape planting. It is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects.

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

ESC has repeatedly and consistently reiterated the importance of a strong strategy for coordination between the NGET and NGV projects, to minimise as far as possible the impacts of the project(s) on the local communities and environment.

#### *Delivery of the Friston Substation*

ESC asks NGET to explore every opportunity to coordinate the delivery of the Friston substation.

ScottishPower Renewables has consent to deliver the Friston substation under the East Anglia One North and East Anglia Two consents, and consent for this substation will also be included in the Sea Link DCO application. It is then expected that the NGV projects LionLink and Nautilus (if it comes forward in east Suffolk) will seek consent for extensions to the National Grid substation to accommodate their projects.

The local communities and environment will be subjected to a prolonged period of disruption if each project successively implements their consents at the Friston substation.

ESC asks NGET to explore every opportunity to make the delivery of the Friston substation as coordinated as possible, including looking to deliver the substation in one phase. If the substation could be built out to accommodate the consented ScottishPower Renewables substation, the Sea Link, Lion Link, and Nautilus projects in one set of works rather than independently and successively, this could shorten the overall length of construction activity impacting local residents.

The situation and expectation surrounding the Friston substation has progressed substantially since the examination of the ScottishPower Renewables projects. At that time, discussions on the sizing and detail of the Friston substation was predicated on accommodating only the East Anglia One North and East Anglia Two offshore wind farms.

Now, the Friston site will accommodate the ScottishPower Renewables projects, NGET's Sea Link project, and is likely to accommodate NGV's LionLink and Nautilus projects (if consented). As such it is now vitally important to consider how best to deliver the Friston substation, to minimise the impacts of a potentially prolonged construction period across multiple separate projects.

#### *Reduction of the Order Limits*

ESC is concerned that the consultation proposes reduced Order Limits, now excluding the cable routes for NGV's LionLink project. The justification given in the document is that other projects are working to different timelines to Sea Link, and also states that the exclusion of other projects' infrastructure from the Sea Link red line does not preclude coordination, as the physical space will remain for other projects to use. This leaves the opportunity for promoters to carry out works in the same area in succession without a clear strategy for coordination, meaning the environment and local communities will be subject to successive impacts.

This is of particular concern with the proposed converter station site. The site will likely be required to accommodate the Sea Link project followed by NGV's LionLink and Nautilus projects if consented. ESC sees a significant opportunity to achieve coordination in this location, beyond simply collocation of infrastructure in one place, by developing a strong masterplan. This includes looking for coordination between projects for elements including but not limited to landscape and drainage and exploring opportunities for infrastructure installed for the first project to be delivered (understood to be Sea Link) and then expanded or modified to support the delivery of subsequent projects' converter stations on the site.

ESC is concerned about the reductions to the Order Limits proposed in this consultation being made before all relevant surveys and assessments or design master planning work being done, and NGET limiting their flexibility to amend their proposed works to account for the findings.

NGET has publicised that archaeological trial trenching is being carried out this summer from 8 July. The reduction in Order Limits before the conclusion and evaluation of the trial trenching raises concern. Reducing the Order Limits now limits the amount of flexibility the project has to avoid areas of archaeological interest in the future and is considered a premature step to take before the results of the trials are known and understood.

ESC has continually raised significant concerns regarding the cumulative impacts of these multiple NSIPs for a number of years, both to government through letters and consultation responses, to government regulators, and to developers of individual projects, and will continue to do so.

### *Ecology and Biodiversity*

A coordinated approach to the delivery of the converter station site also maximises the potential Biodiversity Net Gain, which would be supported.

### *Environmental Protection*

Whilst coordinating projects is welcomed the cumulative impact of undertaking works and co-locating multiple projects must be carefully considered and assessed in term of noise and vibration, air quality and dust, light and other environmental protection matters, coordination should seek to reduce overall impacts and prevent magnifying such impacts by their cumulative effects.

The Project Update document states *“Our proposals continue to allow for the co-location of key infrastructure with potential future projects. Although it already has consent as part of another third-party project, we have kept the National Grid Electricity Transmission element of Friston substation within our proposals so that, in the unlikely event it is not built under the existing consent, it could be built as part of Sea Link. If the substation is built under the existing consent, we would only need to build a connection into it.”*

Co-location of infrastructure needs very careful consideration and further information and needs to address cumulative impacts, or potential cumulative impacts based on reasonable conservative assumptions where information is not known, assessments should be made for the variety of potential known options. Background Noise creep in terms of operational noise remains a significant concern and therefore needs careful consideration in terms of assessment and design of the substation to mitigate for noise.

### **Other Comments**

ESC would like NGET to consider early planting around the converter station site at Saxmundham, ahead of construction commencing.

ESC would like to highlight the pre-construction planting agreed under the ScottishPower Renewables consents around the Friston substation. ESC would not wish to see mitigation planting delivered under one project’s consent be subsequently harmed and its function diminished by another project following it.

### **Mitigation and Compensation**

Where the PEIR has identified significant residual harm following the application of the mitigation hierarchy, ESC expects NGET to first look to mitigate the effects, and then where appropriate to look at compensation for residual impacts. We would expect discussion on how to compensate the residual impacts.

For example, in relation to the converter station site, the original PEIR reported a preliminary medium magnitude of effect and a significant adverse effect for recreational receptors along the local PRoW network to the west of the B1121. Due to the increased scale of the bridge now proposed over the River Fromus, the increased construction activity has the potential to have a higher magnitude of effect on sensitive receptors within the vicinity, including the local PRoW network.

Paragraph 1.7.11 of the Additional PEIR states the *“construction activity associated with the bridge would increase the scale of change within the view in the context of Hurts Hall and St John’s Church, Saxmundham and such changes would be in closer proximity to the receptor than the construction activity associated with the converter station site and potentially viewed in combination with it. The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the*

*potential to further open up views toward the converter station site and increase the focus towards this activity. The effects to such recreational receptors in the locality would remain as a significant adverse effect, as reported within the original PEIR.”*

*Paragraph 1.7.15 goes on to say “due to the increased scale of the bridge over the River Fromus, there is the potential to have a higher magnitude of effect on the receptors within the local PRow network as a bridge of this footprint and height would remain prominent within views within the local landscape even once the mitigation planting is established. The removal of the plantation and woodland vegetation to facilitate the construction of the bridge structure has the potential to further open up views toward the converter station site and consequently direct views toward the permanent infrastructure. The effects on such recreational receptors in the locality would remain as a significant adverse effect, as reported within the original PEIR.”*

Given the assessed significant effects on the PRow network, ESC would welcome conversations about how to best mitigate and compensate the effects, including potential enhancements to existing PRow in line with ESC’s ambitions in our Cycling and Walking Strategy. The Strategy seeks to create safe, coherent, direct, comfortable, and attractive cycling, walking, and wheeling environments that lead to improvements in health and wellbeing, facilitate greater social interaction and play, encourage more environmentally sustainable lifestyles, reduce road congestion, and support economic growth.

We understand the communities may have ideas on areas to offset or compensate the impacts of the projects, where impacts are directly linked to the projects. It is again important to reiterate that Sea Link is not being developed in isolation - there are multiple other projects proposing compensatory measures and so there is potential for NGET to coordinate compensation associated with Sea Link with other measures proposed by other project promoters.<sup>5</sup> The Section 111 agreements reached with ESC by the ScottishPower Renewables projects are linked below.

#### Community Benefits / Compensation

The benefits of security of electricity supply are felt nationally, but the impacts of hosting such large infrastructure are felt by communities closest to it. These impacts are felt during the lifetimes of these projects, from construction, operation, to decommissioning. It should be noted that these impacts are created in a context where no significant economic benefit in the immediate area once the construction phase is over is provided.

It was noted that at the webinars held early in the consultation there were questions from the public about potential financial and community benefits, for local communities affected by the construction of the project.

If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. The Council would welcome further engagement with the applicant on this matter.

It is important that community benefits remain distinctly separate from the need to adhere to the mitigation hierarchy, firstly to avoid, then to mitigate, and only if mitigation is not adequate, to compensate. As part of this process, it is important that consideration of long-term enhancement and legacy opportunities are maximised.

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<sup>5</sup> [ExA.AS-37.D8.V1 EA1N Section 111 Agreement with East Suffolk Council](#)  
[ExA.AS-37.D8.V1 Section 111 Agreement with East Suffolk Council](#)



## Summary of Asks

For ease of reference, a list of ESC's asks from NGET is extracted from the detailed response above and reproduced here. These are in addition to those set out at in our statutory response.

In relation to Changes to Permanent Infrastructure: Changes to the Permanent Infrastructure Planned as Part of Sea Link, including Cable Routes and Converter Stations/Substations:

- Further information about the implications for the Sea Link project from coordination with other projects
- Further engagement on the Friston substation in relation to changes to the Order Limits made to reflect the ScottishPower Renewables consents, including drainage arrangements
- Further information of and discussion on the decision to progress the western access route to the converter station site, including justification for removing the northern and southern access routes, and potential alternative routes which would not require crossing the Fromus
- Clarification on the proposed pylons and modifications/works proposed to them, around the Friston substation
- Provision of a full tree survey and arboricultural assessment for trees adjacent to the Fromus crossing for discussion
- Assessment of the ecological value of trees in the area of the Fromus crossing, including identification of potential veteran trees
- Photomontages to show the potential visual impact of the Fromus crossing in the landscape, both with and without landscape mitigation planting, including viewpoint from Hurts Hall and towards Hurts Hall from the west
- Consideration of the impact of the increase in Order Limits around Hurts Hall, including consideration of the impact of landscape mitigation planting and environmental enhancements on the significance of the Hall and its setting
- Full assessment of the impacts of the changes in relation to noise and vibration, air quality, dust, and light
- Consideration be given to private water supplies along the cable route
- Consideration be given to the positioning of joint bay locations in relation to residential receptors and appropriate mitigation where needed, also applicable to cable sealing end compounds if required

In relation to Changes to Construction and Maintenance Work: Proposed Changes to How NGET Would Build and Maintain Sea Link in Construction and Operation:

- Further consideration of the siting of construction compounds and the potential to coordinate compounds across projects, including ensuring the refined compounds remain fit for purpose and can accommodate the necessary infrastructure, including drainage arrangements

- Consideration of potential to coordinate construction accesses to the Saxmundham converter station site with other projects
- Further discussion on the core working hours for the construction period, and discussion on potential mechanisms to seek additional working hours, including the potential for works to be carried out on Saturday afternoons, Sundays, and bank holidays, and the type of activities anticipated
- Further detail on the proposals for trenchless construction methods near the SSSI and cable landfall route, including confirmation on the extent to which this method would avoid alteration to the beach profile, with regard to morphological changes to beach height across and/or along the shore
- Further discussion about the project's impact on mental health and wellbeing, including discussions on how to mitigate and compensate impacts where appropriate.

In relation to Changes to Mitigation, Enhancements, and Approach to Biodiversity Net Gain: Proposed Changes to Environmental Mitigation, and Delivery of Enhancements to the Local Environment

- Justification for the use of land for acid grassland creation and BNG
- Sufficient evidence on the suitability of the proposed site for acid grassland creation and likely success of habitat creation be provided in the ES, including proposals to monitor its effectiveness during Sea Link's construction phase
- Consideration of impacts on the setting of Hurts Hall from landscape mitigation proposals, and any impacts identified and balanced against the landscape benefits

In relation to Changes to the Strategy for Coordination: Proposed Changes to Coordination of the Construction and Operation of Sea Link with Other Planned Projects in Suffolk:

- Further consideration and exploration of all opportunities to coordinate with other projects, beyond simply co-locating infrastructure, including discussion with ESC and other stakeholders
- Exploration of potential to coordinate construction compounds with other projects
- Further consideration of and discussion on the potential to share cable routes with other projects, specifically, but not limited to, the AC cable route between the Friston substation and the converter station at Saxmundham
- Continued discussion and engagement about masterplanning the converter station site

In relation to other comments:

- Consideration of and discussion on early pre-construction planting around the Saxmundham converter station site

- Further discussions on ideas for mitigation and compensation, including potential enhancements to the existing PRoW network, and engagement with the affected communities to explore opportunities to offset or compensate impacts
- Further discussion on community benefits and compensation for communities affected by the project

We trust the feedback provided in this letter is useful and we welcome ongoing engagement for this project.

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