



Our ref: Sea Link Additional
Engagement
Date: 10 January 2025
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By email only to: contact@sealink.nationalgrid.com

Dear Sir/Madam,

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

East Suffolk Council (ESC) welcomes the opportunity to provide additional comments on the changes to the Sea Link project since additional targeted consultation was held July-August 2024.

ESC's position on the Sea Link project at the 2023 statutory consultation was one of objection. This position has been maintained since. The changes presented in this additional engagement do not change this position. Nonetheless, ESC has provided detailed general and technical comments in the response below. These comments are made in addition to those made at non-statutory consultation in 2022, statutory consultation in 2023, and additional consultation in summer 2024.

The Summary of Design Amendment Following Targeted Consultation published in the Local Engagement and Project Update (November 2024) identifies four key areas of change for the Suffolk end of the project. These four key areas are the Fromus crossing, construction and maintenance compounds, mitigation and enhancement land, and other changes.

While ESC is pleased to see progress in some areas in response to comments made in ESC's response to the additional targeted consultation, it should be noted there are still extensive comments not responded to by this project update that are yet to be addressed. This is of particular concern given the submission for development consent is anticipated to be 'early 2025'.

The Council fails to see how proper consideration has been given to all responses to this engagement, along with all previous responses, for NGET to be in a position to submit a fully evidenced and prepared DCO submission on the current timescale. ESC reserves the right to make these comments again when requested by the Planning Inspectorate to comment on the project's

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Adequacy of Consultation. To compound East Suffolk's concerns, ESC remains disappointed at the lack of meaningful engagement with other energy scheme promoters locally, to scope out the potential for sharing of opportunities to reduce cumulative impacts.

This response is structured into general comments on the timing of this additional engagement in relation to the Development Consent Order (DCO) application submission and the limited information provided at this time, followed by technical comments on the additional material published in each of the areas identified above.

General Comments

ESC recognises the limited scope of this additional engagement and that it has not been held as a formal consultation. The material has been published on NGET's Sea Link project website in the Document Library, stated as 'Local Engagement and Project Update (November 2024)'. It has not been published as an additional consultation nor has a mechanism for feedback on the published documents been provided, which has led to confusion among members of the public.

ESC is aware of concern and confusion in the communities about the purpose of the publication of these amendments so close to the anticipated application submission to the Planning Inspectorate, stated in the Summary of Design Amendment Following Targeted Consultation as 'early 2025'. As mentioned above, ESC may raise this in its response to the Planning Inspectorate's Adequacy of Consultation request.

ESC has previously and consistently stressed the importance of communities being kept up to date, and so this project update is welcomed. A key part of this is ensuring information is presented and published in a manner that is easy to understand and engage with, with expectations for engagement clearly understood.

East Suffolk's communities have had to engage with many nationally significant infrastructure projects (NSIPs) for several years and often have to do so simultaneously, 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.

While these changes in isolation may not be material or substantial changes, the presentation and timing of their publication has created confusion, particularly over the festive period which is an important period of respite for many communities, many of whom are already suffering consultation and project fatigue from seeking to engage with East Suffolk's multiple consented, planned, and known NSIPs.

Additionally, while ESC welcomes the project update in principle, the limited supporting information provided has meant comments must be limited and subject to further comment once more detail has been shared. This is particularly relevant for the Fromus crossing, where ESC has not seen visualisations of further design drawings and requested 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 in response to the additional targeted consultation in summer 2024. This is a particular concern as the DCO submission is rapidly approaching.

ESC asked for additional detail and information in its response to the additional targeted consultation in summer 2024, noting then there was significant concern from members of the public about the potential impact and design of the Fromus crossing. This information has not been provided, and this is a particular area of concern for stakeholders and the public.

ESC wishes to once again reiterate the importance of a strong masterplan led design approach to the converter station site. ESC has supported, and will continue to support, a collaborative and creative approach to master-planning the site and meaningfully engaging stakeholders in this process. This project update does not contain any additional detail on the masterplan process or design approach, including the recent announcement from Ofgem of Nautilus' return to a connection at the Isle of Grain and what this means for the masterplanning approach.

This project update introduces some expansion of the Order Limits around the converter station site for drainage flexibility, though these areas of change are limited in nature and scope. ESC has continually reiterated the importance of appropriately sized Order Limits to secure both a strong masterplan led design approach and allow appropriate flexibility for the required mitigation, specifically appropriate landscape planting. This is discussed in further detail in the sections below. ESC considers further engagement on this is critical and of paramount importance ahead of DCO application submission.

Technical Comments

Fromus Crossing

General Comments

In addition to the objections and concerns already raised by ESC and others to this proposed access route and not being satisfied that alternative routes have not be satisfactorily dismissed, ESC provides comments below in respect of the details published.

Paragraph 1.2.2 of the Summary of Design Amendment Following Targeted Consultation states "*the final design of the bridge would be confirmed at later stages, but we are working with architects,*

the local planning authorities, and the local design review panel to agree designs for a bridge crossing that adopts an architectural approach that is sensitive to its setting.”

ESC has previously raised concern about the impact of the Fromus crossing in the landscape, introducing a crossing of significant scale in a sensitive landscape setting in proximity to the Grade II Listed Hurts Hall.

ESC welcomes the project’s engagement with the Suffolk Design Review Panel and considers its feedback an important element for NGET to consider and incorporate into the final bridge design proposals. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including engagement with key stakeholders.

Landscape and Arboriculture

ESC welcomes the effort to avoid the Veteran Horse Chestnut tree that stands in the vicinity of the crossing area, but this is very much a provisional endorsement of this change because ESC still has not seen any detailed tree survey and Arboricultural Impact Assessment information, including what other important trees could be lost as a result of efforts to avoid the Horse Chestnut.

The issue is further complicated by the prospect of the formal introduction of a new version of BS5837 Trees in Relation to Design, Demolition and Construction (currently scheduled for April 2025) which has significantly greater protection recommendations for Veteran and Ancient trees and which could still be a potentially unsurmountable constraint for the crossing.

The timing of the new British Standard is also a tricky issue for the submission as a whole because as soon as it enters force, ESC will expect all tree survey information to be submitted or re-submitted according to the new guidance.

Design and Heritage

Moving the Fromus bridge approximately 40m north along the river will bring it closer to Hurts Hall and to the south of Saxmundham. This will make the crossing more prominent in important views toward Hurts Hall and the church of St John the Baptist.

ESC agrees with the identification in the Additional Preliminary Heritage Information – Design Amendments in Suffolk of the heritage assets most likely to be affected by the Fromus crossing as Hurts Hall (Grade II), Church of St John the Baptist (Grade II*), and the Saxmundham Conservation Area.

The potential impact on the Conservation Area and on St John the Baptist is a result of the introduction of the bridge and the permanent access, as stated in the document, however the potential impact of the mitigation planting around the bridge and access should also be considered.

Introducing large areas of planting where there are currently open views toward a heritage asset has the potential to affect their significance if it obstructs those views.

ESC wishes to highlight a small error in paragraph 1.2.8 relating to Hurts Hall: the previous hall burnt down in 1889, and not 1899 as stated in the document.

Paragraph 1.2.16 states *“site visits, as well as the Zone of Theoretical Visibility (ZTV), have confirmed that there will be no views of the proposed Saxmundham Converter Station from the ground level of Hurts Hall, and it is assumed that views from the upper floors will also be limited. This is largely a result of topography and existing woodland.”* ESC considers visuals of the Zone of Theoretical Visibility should be included in the ES to evidence this point.

The conclusion in the Additional Preliminary Heritage Information – Design Amendments in Suffolk that the overall level of harm to the heritage assets is unlikely to be in the ‘substantial harm’ category is agreed with. The category of ‘less than substantial harm’ is very broad, and within this category the impact on the heritage assets may be at the higher or the lower end. This can only be assessed once visualisations have been produced.

It has not been possible for ESC to provide more detailed comments on the design of the proposed bridge or fully consider the anticipated impacts on the heritage assets due to the limited detail provided on this feature at this stage. ESC request that further detail is provided so that genuine engagement on this structure can be undertaken. If detailed design is to be left to the post consent stage, which is not the preferred option, ESC would expect this to be supported by post consent approval process in addition to local engagement, the framework for which has been established pre-consent and secured by the DCO.

Construction and Maintenance Compounds

General Comments

Paragraphs 1.2.6-1.2.8 of the Local Engagement and Project Update states areas of land have been reintroduced adjacent to the converter station site to provide more flexibility on the location for the construction compound, a decision made following discussions with National Grid Ventures regarding their ‘proposed interconnector projects’.

This additional information was published two weeks after the publication by Ofgem of the news that the Nautilus interconnector project will seek to connect at the Isle of Grain in Kent, instead of Friston in Suffolk. ESC welcomed this news.

It is vital that the Sea Link DCO submission clearly presents the project’s approach to coordination at the Saxmundham converter station so that stakeholders, including the communities who will be

affected by the construction of Sea Link and the other projects, can understand how the proposals for the converter station site have been developed and why.

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. 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.

Intentions of coordination with National Grid Ventures 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.

Mitigation and Enhancement Land

Ecology

The amendment to include skylark mitigation within the Order Limits is welcomed, however in the absence of any detailed information on the proposals for the other amended ecological mitigation areas it is difficult to comment in more detail. In particular, it remains unclear how NGET is intending to secure the habitat creation/restoration, management and monitoring measures that will be needed for those areas.

It is also understood that areas for delivery of Biodiversity Net Gain (BNG) habitats have been removed from the Order Limits, in favour of delivering this requirement offsite. Whilst in principle there may be ecological benefits by following this approach, in the absence of more detail about how this will be delivered and secured it remains a concern how adequate BNG delivery can be appropriately achieved.

Further information is required on these matters ahead of the DCO submission.

Design and Heritage

A section of land north of the proposed Fromus crossing has been removed from the draft order limits. This is positive, as it removes the potential of important views toward Hurts Hall being blocked by mitigation planting.

Other Changes

General Comments

ESC welcomes NGET reviewing the Order Limits to ensure appropriate flexibility is included, as outlined in paragraph 1.2.13 of the Summary of Design Amendment Following Targeted Consultation. This paragraph states “Other changes include introducing more flexibility for routing the underground cables into Friston substation, to allow us to better coordinate final routing with future projects so as to retain the effectiveness of the proposed landscape planting.” This is welcomed; ESC has repeatedly raised concern, mostly recently in its response to additional targeted consultation in summer 2024, that 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 adversely affecting and removing the agreed mitigation planting around the Friston substation. ESC has repeatedly stressed that 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, a key element of which is landscape planting. ESC reiterates that it is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects. ESC therefore continues to request that NGET review. In particular ESC continues to request that NGET includes the ability within their DCO to provide the ducting for the LionLink project which would help to reduce unnecessary disruption to the local community, environment and consented and secured mitigation planting.

It is essential that NGET ensures they have secured the appropriate Order Limits around Friston to facilitate the delivery of the national grid substation should SPR not deliver this infrastructure. At present there remains discrepancies between the projects Order Limits around Friston when compared to the Order Limits consented by SPR. This includes the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed.

Converter Station

ESC previously raised concern in its response to the additional targeted consultation held summer 2024 about the reductions to the Order Limits proposed in that consultation being made before all the relevant surveys and assessments or design master planning work being done, and NGET subsequently limiting their flexibility to amend their proposals to account for the findings. ESC therefore welcomes NGET revisiting the Order Limits to secure appropriate flexibility now.

It is also noted from the updated General Arrangement Plans that the Order Limits have been broadened to the south of the converter station site to allow flexibility of drainage route. This is not covered in the Summary of Design Amendment Following Targeted Consultation and so no further detail has been provided at this stage, but ESC welcomes this change in response to concern ESC

raised at the previous consultation stage about securing appropriate Order Limits to accommodate the necessary drainage proposals.

While the Order Limits have been expanded in certain areas, it does not appear the Order Limits to the north of the converter station site have been expanded. ESC has previously raised concern about the size of the Order Limits in this area and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. This area also provides an opportunity to commit to early planting close to receptors.

It seems that the Order Limits are being reconsidered in some areas and in some locations, but this has not been carried out as part of a wider holistic approach to masterplanning the converter station site. As stated above, ESC has actively supported and engaged with the opportunities offered by NGET on masterplanning, but considers significant further work is essential. The Order Limits, particularly limitations placed by overly constrained Order Limits, are a critical element of achieving a strong design led masterplan.

ESC is aware of concerns and comments from other stakeholders about the Order Limits including Benhall and Sternfield Parish Council; specifically concern about the safety of vulnerable road users and the need for the Order Limits to be sized to accommodate the necessary mitigation and safety measures to address these concerns. While ESC defers detailed comments on highways matters to Suffolk County Council as the Local Highway Authority, ESC reiterates the need for the project to fully mitigate for potential impacts and maximise opportunities for long-term enhancement and legacy opportunities are maximised, including improved connections and linkages for our communities. An important part of this is considering the Order Limits and the flexibility to include potential mitigation.

As raised in ESC's previous consultation response, ESC would welcome conversations about how to best mitigate and compensate the effects of the project on Public Rights of Way (PRoW) and users of the highway network, including potential enhancements to existing PRoW in line with ESC's ambitions in our Cycling and Walking Strategy.

Landscape and Arboriculture

At present, there is no additional information to comment on. Other changes to the routing of accesses and cable routes can be more specifically addressed once the full tree and hedgerow survey information is provided.

There is a lack of information in relation to early planting, a factor which has been considered as part of other NSIPs and secured in other DCOs.

Conclusion

ESC remains deeply concerned with the project and the approach taken to engage with the local community and key stakeholders, including ESC, and whilst welcoming the opportunity to comment on these limited changes, ESC reiterates the importance of NGET carrying out genuine engagement and remains concerned that this is not being delivered, particularly given the intended timescales for submission. There is limited time to properly consider responses and adapt/amend proposals accordingly, or if not, make changes to adequately justify NGET's position. As always, ESC remains committed to working with scheme promoters and expects NGET takes this opportunity to review the proposals, engage with the community in a meaningful way in order to submit a scheme that has addressed as many of the concerns as possible, notwithstanding the objections the Council has to this scheme.

While the details published by NGET in this project update have been made partly in response to concerns raised by ESC and other stakeholders, the majority of comments and concerns raised by ESC have not been addressed. These concerns have been set out in ESC's response to non-statutory consultation in 2022, statutory consultation in 2023, additional targeted consultation in 2024, and repeated in this response.

We trust the feedback provided in this letter is useful and we welcome ongoing engagement for this project. If you wish to discuss any of the matters raised within this response further, please do not hesitate to contact us using the details above.

Yours sincerely,

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

Philip Ridley BSc (Hons) MRTPI

Head of Nationally Significant Infrastructure Planning
East Suffolk Council