

APPENDIX A



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

1.0 Introduction

- 1.1 East Suffolk Council (ESC) welcomes the opportunity to provide comments on the proposals for the Sea Link project. The Council's comments have been set out below.
- 1.2 During your consultation ESC held a meeting with the directly affected town and parish councils to seek their views on the project. The views expressed have been included in ESC's response. It was clear during the meeting that there is no town or parish council support for the proposal currently being consulted upon. A copy of the notes from the meeting held with directly affected town and parish council representatives has been provided at the end of this report.

2.0 Engagement on the Sea Link Project

- 2.1 ESC wishes to highlight at an early stage in this response concerns in relation to the engagement on the project. Whilst the higher-level project overview meetings on Sea Link have been scheduled regularly throughout the pre-application period, the detailed engagement on a technical level has been extremely limited and inadequate. Ahead of the statutory consultation ESC would have expected technical officers to be regularly engaged in all the thematic areas but this has not been the case. Whilst a limited number of meetings have been held with technical officers, these have been insufficient in number and depth and there has not been the appropriate opportunity to feed into the assessments and preliminary environmental information. In relation to some vitally important topic areas, there has been no engagement at all, these include coastal processes, ecology, surface water drainage and flood risk and air quality. The engagement with ESC in relation to the technical details of the project must be improved going forwards. In addition to this, engagement with the local communities is also essential and should be a key feature of the pre-application phase.

3.0 National Policy

- 3.1 The Energy National Policy Statements (NPSs) were updated in November 2023 with the publication of revised NPSs EN-1 to EN-5. ESC notes that EN-1 identifies that *"there is an urgent need for new electricity network infrastructure to be brought forward at*

pace to meet our energy objectives” (paragraph 3.3.65), in addition to this it is noted that the “volume of onshore reinforcement works needed to meet decarbonisation targets is substantial”, specifically noting the need for “substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation” (paragraph 3.3.68). Distribution Network Operators are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economic proposals in terms of network design. However national policy is clear that “in considering the ‘economic and efficient’ approach the network project needs to follow good design, avoidance and mitigation principles as reference in EN-5” (paragraph 3.3.78).

- 3.2 Paragraph 3.3.80 of EN-1 goes on to state “...considering the potential or unwarranted and avoidable disruption, inefficient, and visual impacts along the onshore-offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits.”
- 3.3 Therefore, whilst EN-1 recognises the need for new electricity networks in order to meet the future energy demands, the importance of good design and need for coordination to reduce the adverse impacts on the local communities and environment is acknowledged. The revised NPS EN-5 supports need for coordination stating that “The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible”.

4.0 Offshore Transmission Network Review and Coordination

- 4.1 The Council has been engaging with the Government regarding the unstructured and non-collaborative approach to energy development which the revised NPSs seek to address¹. 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 NPSs. This however is not currently the case with projects delivered in a piecemeal fashion with little regard for the cumulative impacts, this cannot continue to occur at the expense of Suffolk’s environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation. The Offshore Transmission Network Review (OTNR) was announced in 2020 following recognition by Government that the current un-coordinated approach to offshore transmission lacked any strategic vision and was causing significant environmental and local impacts from the associated onshore infrastructure. It was recognised that point to point connections do not always provide the most efficient

¹ [Strategic engagement » East Suffolk Council](#)

approach and could become a major barrier to delivery. This is a matter which ESC has been highlighting and calling for action on from the Government since 2018.

- 4.2 ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link, EuroLink and Nautilus projects at all stages of the development consent process². It is also 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.
- 4.3 ESC requests that consideration be given to an offshore grid solution and the use of brownfield solutions for the onshore infrastructure. The principle of subsea interconnectors is an important part of an offshore focused approach, but it needs to be ensured the connections are made in the right locations.
- 4.4 On 5 December 2023 it was announced that North Falls, Five Estuaries and Sea Link had been successful in receiving grant funding from the OCSS. The purpose of the funding from the OCSS was to enable the exploration of coordination between the two offshore wind farms and Sea Link. Given the association between Sea Link, LionLink and Nautilus, the opportunity for co-ordination created by the funding has been significantly limited. It is unknown whether there will be further funding granted for other projects as part of the OCSS, but at present the outcomes of the OTNR more generally, and the limitations on the potential benefits from the OCSS, 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 will be a potential reduction in the infrastructure overall the benefits will primarily be felt in Essex, it is not evident that there would be any reduction in the onshore infrastructure within east Suffolk.
- 4.5 ESC would like to understand the proposals put forward by Sea Link as part of the OCSS bid and to understand the implications for the current proposals put forward in the consultation. ESC would also like to be fully engaged and kept up to date on the work proposed to be undertaken as part of the OCSS funding, seeks further details on timescales for this work, implications for the consenting timeframe and details of anticipated further consultations on the proposals as a result.

² Dear [Click and type Name] ([eastsoffolk.gov.uk](mailto:info@eastsoffolk.gov.uk))

- 4.6 ESC also notes that following the outcomes of the OCSS, National Grid Electricity System Operator made a commitment to review the connections in East Anglia, this work is yet to be undertaken and therefore increases the amount of uncertainty.
- 4.7 Notwithstanding the above, ESC acknowledges that National Grid Electricity Transmission (NGET) has endeavoured to plan for a degree of co-location, whilst this is a step in the right direction, this has however not been reciprocated by the other projects. LionLink for example continues to promote a number of different landfall, cable route and converter station location options, the converter station site east of Saxmundham is just one of these options and no indication of a preferred site has been given. The degree of coordination 'buy in' from the various scheme promoters is very unclear. National Grid Ventures (NGV) has also not provided any further details of the siting and routing options for Nautilus since their non-statutory consultation and therefore the siting and routing options in relation to this project are unknown. It is noted that NGV are exploring a potential alternative connection for the Nautilus project at the Isle of Grain which ESC fully supports, however the feasibility of this has not been confirmed and the uncertainty surrounding the connection location for this project is very challenging.
- 4.8 The lack of coordination evident between Sea Link and other proposed NSIPs connecting in the same locality is a significant concern. Should the Sea Link project continue to be progressed, maximum coordination should be inherent within the design and ambitious solutions delivered as the revised NPSs state. 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.
- 4.9 As stated above, coordination should be sought during all phases of the developments, not just at the siting and routing stage, although the co-location and sharing of infrastructure/corridors at the siting and routing stage is important. The various NSIPs are currently being proposed on the basis of multiple different timescales. In order to deliver a genuinely coordinated approach, ESC considers that National Grid PLC should seek to align their projects (Sea Link and Lionlink with the addition of Nautilus only in the event it connects in east Suffolk) both spatially but also temporally in terms of consenting and delivery. The alignment of timescales would allow a shared or conjoined examination with the appointment of the same examining panel to consider the projects. This would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the coordinated design and cumulative impacts of the projects.
- 4.10 In order 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 the projects all

receive consent, we avoid the situation where each project is being delivery one after the other, with the construction effects being elongated and experienced over many years.

5.0 Need

5.1 The project is said to be required in order to be able to transfer energy to and from Suffolk and to and from Kent. However, in respect of exporting energy from Suffolk and Suffolk grid reinforcement, the need for the project only arises once Sizewell C, LionLink and Nautilus are all operational (the latter two are 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 for Sea Link. If Sea Link is consented; its implementation should be conditional on the other three projects all being committed. With regard to the Kent perspective, Sea Link serves to reinforce the south coast grid but it is not considered that it has adequately been demonstrated that reinforcement by a means other than Sea Link is not possible.

6.0 Overview of ESC's Position on Sea Link

6.1 ESC currently objects to the Sea Link project as it would result in further unacceptable harm to the communities, environment and economy of East Suffolk and it is not yet considered that the timing of the need for the project is currently proven, and with Sizewell C potentially at least 10 years away from generation, it is requested further consideration of alternative offshore solutions is undertaken and consider that the project does not currently include sufficient levels of coordination in all areas of the NSIP process. In reaching this position the submitted plans showing the possible siting of converter stations adjacent to the proposed converter station for this project amplify the coordination/cumulative impact concerns.

7.0 Master Planning and Good Design

7.1 Notwithstanding the Council's position, should Sea Link alongside other NSIPs (LionLink and potentially Nautilus) be progressed within east Suffolk this should be on the basis of a coordinated approach. ESC remains significantly concerns about the cumulative impacts of multiple projects. In order to ensure the delivery of good design, it is imperative that the converter station site is appropriately master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and demonstrate the achievement of long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters but also with statutory consultees, which includes the relevant town and parish councils.

- 7.2 The provision of an inclusive and collaborative master planning process is an important component of the delivery of good design. This collaborative process must however extend into the more detailed design phases and include genuine engagement with the local authorities, parish and town councils and local communities. It is important that the site is designed to minimise the adverse impacts through innovation and embedded mitigation and maximise any opportunities for benefits through the delivery of enhancements. Recent NSIPs consented within east Suffolk have also included an independent design review process which should be included as a commitment within any application.
- 7.3 Further commentary regarding the design of the project has been provided by the Design and Heritage Team within the technical comments section of the report. ESC would welcome engagement on the design approach to the converter and substations in addition to the overall master planning. It is noted that currently the design proposals appear to be limited to that of the converter station, similar consideration should be given to the design of the substation at Friston.

8.0 Landfall

- 8.1 The landfall identified is located at the seaside town of Aldeburgh, just across the road from the well-known sand and shingle beach. The site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), RSPB North Warren Reserve and close to the Sandlings Special Protection Area. The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance. Further details in relation to ESC concerns regarding the impact on the tourist economy from this project in combination with other NSIP projects has been provided in the project wide section later in the report.
- 8.2 The Preliminary Environmental Information Report (PEIR) makes the assumption that the Leiston-Aldeburgh SSSI which is part of RSPB North Warren Reserve will be crossed using trenchless techniques and therefore direct impacts on the designated sites will be largely avoided. No evidence has however been provided to demonstrate that this technique is feasible in engineering terms and therefore deliverable. Without this certainty there is potential for greater impacts to occur. Greater information, evidence and justification must be provided to demonstrate the deliverability of the trenchless technique chosen and then this technique would need to be secured within the Development Consent Order (DCO).
- 8.3 Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted, but the PEIR has not considered the potential risk of 'frack out' associated with this technique and the impacts this could have. ESC has experience of other NSIP

projects utilising HDD techniques and, on each occasion, 'frack outs' have occurred. The potential hydrological impact from the trenchless construction works on the designated sites has also not been assessed, it is therefore unclear what measures could be implemented to address potential impacts which could arise.

- 8.4 Access to the landfall area by large vehicles is limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The difficulties of large vehicles using the roundabout at the entrance to Aldeburgh was explored as part of the East Anglia One North and East Anglia Two projects and therefore ESC recommends that NGET revisit this information and the challenges faced.
- 8.5 ESC could not find any landfall impact assessments, material or reference to any consideration of coastal change or impacts on/from existing planned coastal structures within the consultation documents. If NGET has scoped coastal change from this stage of the process this is a significant oversight which should be rectified moving forwards. The section of the coast proposed for the landfall is managed by the Environment Agency and so the applicant should ensure they are consulted on this matter. ESC has responsibility for managing coastal frontages to the north (Thorpeness) and south (Aldeburgh) of the proposed landfall and so would have an interest in the findings of the coastal change/management impact assessment.
- 8.6 The impacts on residential properties must also be taken fully into consideration. The western end of the landfall and cabling corridor are in close proximity to residential properties. Construction activities taking place at the landfall site, from previous experience, will necessitate some 24-hour working which could cause significant noise and disturbance to local residents.
- 8.7 Flood risk is also a significant concern. The low lying Hundred River valley has the potential for surface water and tidal inundation and lies within Flood Zone 3. Flood risk from all sources of flooding must be very carefully considered.
- 8.8 Finally, given the sensitivities of the landfall site significant further detail is required in relation to the impacts of the works at the landfall from both one project alone and cumulatively, in addition to the provision of required mitigation. ESC request that spatial and temporal coordination is fully explored as this could deliver a significant reduction in the adverse impacts socially, environmentally and economically.

9.0 Cable Corridor

- 9.1 The cable corridor associated with the Aldeburgh landfall is heavily constrained on the eastern end by ecological and landscape designations in addition to other matters as previously highlighted. If this can be navigated, there is then a significant pinch point at the crossing of Leiston Road close to Aldeburgh Golf Club. At this narrow point the

construction works would not only be near residential properties, but also have the potential to cause significant disruption to one of the main routes into the town from Leiston. Once across Aldeburgh Road the cabling would be to the north of the current golf club layout but through an area of land granted planning consent (DC/22/2697/FUL) to facilitate the expansion of the golf course and the creation of new holes. The corridor also remains within the designated AONB for the majority of its length.

- 9.2 The cable route continues to pass close to residential properties as it travels across to the converter station site, it is proposed the cabling will enter the Friston site from the north which involves running near residential properties and tourist businesses. The route would involve interaction with the East Anglia One North and East Anglia Two Order Limits and cable corridors which are entering the Friston site from the south. The construction works in combination with the offshore wind projects will need to be carefully considered to avoid compromising the mitigation measures already secured under the consented DCOs.
- 9.3 From the converter site there is a need for a High Voltage Alternating Current (HVAC) cable corridor back to the proposed Friston substation. This would result in a cable corridor entering the Friston site from the western side. The proposals in addition to the construction works associated with the East Anglia One North and East Anglia Two projects, should they be constructed, would encircle the village with construction works.
- 9.4 ESC requests that NGET seek to minimise disruption to both residential properties and businesses through micro siting of the route and also by providing appropriate mitigation for the works proposed. Should multiple projects be required to cable through this area, coordination both spatially and temporally will be essential.
- 9.5 There has been no consideration of narrowing of the cable route swathes in particular sensitive locations to reduce the impact of the cable construction works. This embedded mitigation technique was utilised on the East Anglia One North and East Anglia Two projects and ESC considers that such an approach should be fully considered as part of this project. In addition to this further justification is required as to why the cable corridors within the swathes cannot be reduced in width and need to be the widths specified.

10.0 Converter Station

- 10.1 Saxmundham is an historic market town set in the valley of the River Fromas, a tributary of the River Alde. The converter site lies to the east of the town and is detached from the setting of the AONB. The site is bounded to the north by the Leiston-Saxmundham Road (B1119) and to the south by a woodland block and occupies an elevated position in the landscape. The land to the north and east of

Bloomfield's covert is open arable land. Modern commercial farming practice since the mid-20th Century has stripped the landscape of most key features such as field boundary hedgerows, hedgerow trees and small woodland blocks, Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part. The visual impact of the development is hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape.

- 10.2 Access to the site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. Multiple access routes to the converter station have been identified within the consultation. The benefits and disbenefits of each option will need to be carefully considered. For example, the access proposed to the southeast at Red House Farm would seem to cause the least landscape impact, although it would include the loss of hedgerows and landscape character, this would however involve the inappropriate utilisation of narrow rural roads for potentially large vehicles. The northern access of the B1121 would allow the centre of Saxmundham to be bypassed, however it would also result in direct impact on Carlton Park which is a locally listed historic parkland, affect trees subject of Tree Preservation Orders, roadside hedgerows and the setting of Saxmundham Conservation Area. The southern access of B1121 would similarly allow Saxmundham centre to be avoid but as a consequence have direct impacts on the Fromus valley landscape, willow woodland belt and roadside hedgerows. ESC would welcome further engagement on the access options to fully understand the proposals and level of permanence associated with each one.
- 10.3 It is important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site. The Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation.
- 10.4 The site is crossed by Footpaths 5 and 6 which would require diversion, it is essential that any new route provides appropriate amenity for the users. This will feed into the master planning of the site as it is important that any permanent diversion is established with the long-term future of the site fully considered, to avoid the need for subsequent diversions.
- 10.5 As the surrounding landscape is largely undeveloped and open, this needs to be considered alongside the setting of Wood Farmhouse and Hill Farmhouse, Grade II listed buildings. The combination of agricultural land alongside the patches of woodland strongly contribute to the setting of the listed buildings and other surrounding heritage assets. The consideration of setting has been incorrectly based solely on intervisibility and we refer the applicant to Historic England's 'The Setting of

Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (2017) which states that setting may also be understood through 'our understanding of the historic relationship between places.

- 10.6 A list of assets which ESC considers should be included within the assessment has been provided within the detailed technical comments. For example, no justification has been given for scoping out the churches of St John the Baptists (Saxmundham) or Mary Magdalene (Friston). The Church of John the Baptist (Grade II*) stands on the eastern edge of the Saxmundham Conservation Area, on lower ground. While the church is some distance from the site, as medieval structures, churches have a complex relationship with the surrounding landscape, as historic religious centres, and therefore their setting is likely extensive. Further information is required if they are to be screened out.
- 10.7 ESC would like to have further discussions with the applicant in relation to the conclusions reached on the significance of the impact on heritage assets to ensure that the harm is not being underplayed.
- 10.8 In relation to operational noise, the starting point for ESC is to seek a below background sound rating level. The acoustic character of the area is quiet and rural, and the Sea Link project will introduce a potential persistent industrial noise into this area. Projects of this scale have the responsibility and means to ensure they achieve the best possible outcome, and this begins within a thorough assessment considering all aspects of an introduced sound or noise and not simply rely on calculated levels where there is an inherent uncertainty. A robust subjective assessment which considers the character of the area and character of that noise must be undertaken. Noise creep is a concern for ESC particularly in the co-location scenario.
- 10.9 It is noted that the assessment has indicated that with mitigation the sound levels at nearby noise sensitive receptors will be below background, this is welcomed and aligns with ESC asks. It is important that we work collaboratively to ensure that this is the best level which can be achieved, and no further reasonable improvements can be made.
- 10.10 ESC does not currently agree with the scoping out of noise effects from new overhead lines, it is considered further assessment is necessary to justify the assumption of unlikely significant adverse effects.
- 10.11 In addition to the project wide ecology comments provided below, there is concern that the PEIR does not properly consider the operational impacts from noise on birds and other fauna. The current assessment limits its consideration of impacts to maintenance visits and does not consider the operational noise of the converter station. This should be addressed within the future Environmental Statement (ES).

- 10.12 The PEIR is not clear in relation to the role of mitigation planting in moderating the magnitude of effects overtime. In the future ES this needs to be made much clearer and should include a realistic understanding of growth rates for new planting in east Suffolk. The erratic and unpredictable rainfall patterns, notwithstanding the late summer and early Autumn of this year, can be a very limiting factor in successfully establishing new tree and shrub growth. This should be identified in consultation with ESC and once established, further photomontages should be provided to illustrate year 1, year 5 and year 15 post planting. It is essential that a master plan for the site is created to ensure that mitigation planting relied upon for one project is not compromised by subsequent projects.
- 10.13 Further information is required in relation to the cumulative parameters of the collective development and the extent of the infrastructure sharing which would be possible. Good design must be an essential component of the project. The importance of design has also been reflected within the revised NPS EN--1 which encourages the seeking of professional advice on design aspects of the scheme. Design input should be sought at an early stage and continue throughout the consenting and post consent phases. Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario.

11.0 Connection Substation at Friston

- 11.1 The proposed National Grid substation location is a sensitive site, with its historic character, proximity of listed buildings, proximity to residential properties and the settlement of Friston, flood risk, public rights of way and quiet rural positioning. Significant amounts of information were submitted as part of the East Anglia One North and East Anglia Two DCO examinations which should be carefully reviewed and taken into consideration.
- 11.2 The impact of the National Grid substation on the surrounding heritage assets at Friston has been discussed at length by ESC and other stakeholders during the East Anglia One North and East Anglia Two examinations. At the scale that the substation has already been considered, there will be adverse impacts of various magnitudes on Little Moor Farm (Grade II), High House Farm (Grade II), Woodside Farm (Grade II), Friston House (Grade II), Church of St Mary (Grade II*) and the War Memorial (Grade II), and it will cause the loss of a historic track which is considered a non-designated heritage asset. Should the National Grid substation at Friston need to be extended, this would likely worsen the impacts on these heritage assets. Some of the assets have however been scoped out of the assessment which ESC disagrees with.
- 11.3 As previously stated in relation to the converter station site, no justification has been provided for scoping out the church of Mary Magdalene. A full list of the assets which

should be assessed has been included within the technical comments provided later within this report.

- 11.3 In addition to the above assets, Friston Hall is a Grade II listed building located within the village, development within the curtilage is likely to impact its setting and significance, this is not currently acknowledged within the consultation material. More information is required on the loss of a formal landscape historically to better understand impact on the setting of the listed building.
- 11.4 It is noted that the PEIR chapter on existing flood risk and drainage fails to acknowledge historical surface water flooding which has been experienced downstream in Friston. The village has been subject of surface water flooding on multiple occasions. Suffolk County Council as the Lead Local Flood Authority has undertaken s19 investigations under the Flood and Water Management Act 2010 which should be taken into account within the documents. This omission should be addressed within the ES.
- 11.5 It is vitally important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects.
- 11.6 In relational to operational noise, ESC does not agree with the scoping out of the substation at Friston on the basis that the switchgear noise emissions would be impulsive in character and operation would be infrequent. Insufficient justification has been provided to support this decision. This substation is subject of a site rating level imposed by East Anglia One North and East Anglia Two DCOs, therefore NGET needs to be very confident that the introduction of a further or different equipment will not impact that constraint.
- 11.7 As identified above, it is important that the impact of the operational noise of the substation is considered in relation to birds and other fauna.
- 11.8 The proposals in relation to the overhead works differ considerably from that proposed under the east Anglia One North and East Anglia Two projects. It is important that NGET and Scottish Power Renewables work together to communicate any changes and reasons for these, so it is understood whether these have been identified collaboratively. Further detail is required in relation to the interactions of the projects in this regard.
- 11.9 The local community has been subjected to a number of years of uncertainty as a result of the East Anglia One North and East Anglia Two DCOs, the current consultation proposes to increase the amount of infrastructure in the area. NGET should be aware of the detrimental impact this will be having on the affected local community. It is essential that NGET appropriately engages with the local communities and parish and

town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject of previous NSIPs proposals.

12.0 Project Wide Comments

12.1 Ecology

12.1.1 A significant amount of ecological survey work remains outstanding, in addition to some survey work which has been undertaken not being provided for review, the combination of this has limited the ability for ESC to provide detailed comments on the ecological impacts and also the avoidance, mitigation and compensation measures which would be suitable to address these.

12.1.2 The use of terms such as 'where feasible and necessary' within the consultation documents is unhelpful and provides a significant degree of uncertainty in relation to the deliverability of the commitments made. If an assumption is made within the PEIR or future ES and that assumption is utilised for the basis of the assessments, then this must be secured within the DCO and form a firm commitment. Alternatively, the assessment should be based on the worst-case scenario.

12.1.3 In previous examinations there has been significant discussion in relation to growth rates and the agreed period of time planting would take to grow or be restored. It is important that growth rates are agreed with ESC prior to the ES assessments being undertaken on the basis of assumptions made. It is noted that in the PEIR for example, it is stated that the hedgerows will be restored within 1-2 years, there is no justification of this statement and in the Council's experience this is not likely to be achievable.

12.1.4 The provision of 10% Biodiversity Net Gain (BNG) is welcomed, ESC would however want to raise at this early stage that it is expected that 10% BNG will be delivered in both geographical locations independently (i.e. Suffolk and Kent).

12.2 Construction Noise

12.2.1 The use of BS5228 – Code of practice for noise and vibration control on construction and open sites along with the ABC methodology within that code, is accepted. The working hours however set out in the Outline Code of Construction Practice (OCocP) identify Saturday working at 07:00-17:00. ESC does not currently consider that Saturday afternoon working is acceptable. Saturday working hours of 07:00-13:00 were set as part of the East Anglia One North and East Anglia Two projects and should be complied with on the Sea Link project.

12.2.2 ESC has concerns about the magnitude of impact which has been determined by the Design Manual for Roads and Bridges (DMRB). There is a concern that the levels set

provide a false representative of the scale of magnitude and downplay the actual magnitude of impact, a medium impact being the highest theoretically achievable level of impact. Further details are provided in the technical comments later in the report, but ESC would welcome further discussions on the magnitude of impact methodology. ESC has similar concerns in relation to the use of DMRB and the inclusion of above SOAEL magnitude levels in the magnitude impact thresholds, SOAEL being a level to be avoided.

12.2.3 ESC notes that Best Practicable Means (BPM) will be implemented which is welcomed, this should be committed to at all times with work and any noise mitigation carried out to BPM to ensure noise and vibration are kept to a reasonable minimum and not just below the relevant thresholds. BPM is a critical control point for a project of this scale.

12.3 Private Water Supplies

12.3.1 The district has a number of private water supplies that could be sensitive to construction works and therefore ESC would invite NGET to engage with us to ensure that these supplies are protected.

12.4 Air Quality

12.4.1 ESC notes that a detailed air quality assessment will be carried out at the ES stage once further data is available. It is understood that at this stage Non Road Mobile Machinery (NRMM) will be considered further, however the Council would like to see a commitment to reduce emissions from this source which should include commitments to use renewable energy sources alongside Stage 4 NRMM as a minimum and Stage 5 where possible.

12.5 Land Contamination

12.5.1 In terms of land contamination, whilst ESC accepts the risk of contamination may be low, this does not preclude the possibility of unknown contamination and therefore a management plan which provides a robust strategy and procedures for managing contamination should be provided and agreed with ESC.

12.6 Landscape

12.6.1 In addition to the comments previously provided within the response, ESC has concerns regarding some of the value assessments given to selected viewpoints, further justification is required in relation to these judgements, and this discussed further with the Council.

12.6.2 ESC would also expect tree and hedgerow surveys to be carried out to identify the most important landscape features and details provided of how to protect them.

12.7 Socio-economic

- 12.7.1 The visitor economy is one of the largest sectors in east Suffolk accounting for 15% for all employment in the district. The continued success of this sector of the economy is dependent on the areas reputation as a holiday destination and the overall experience offered to visitors. ESC is concerned that the impact of Sea Link in combination with other significant infrastructure projects proposed and consented in the locality will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday designation, ultimately adversely affecting the visitor economy. It is essential that this impact is appropriately considered and assessed, and appropriate mitigation provided to support the success of the sector.
- 12.7.2 The potential benefits of the direct and indirect temporary employment are welcomed but it is essential that these opportunities are accessible to the resident population of east Suffolk.

12.8 Cumulative Impacts

- 12.8.1 The PEIR considers the list of projects to be taken forward as part of the cumulative impacts assessment. It is noted that only projects and impacts considered to crossover with the anticipated peak construction period (2029) of the Sea Link project have been included for final assessment. Cumulative impacts with other projects, particularly NSIPs should not be scoped out on the basis of uncertain construction programme forecasts. For several reasons including legal and funding challenges a number of the consented NSIPs including East Anglia One North, East Anglia Two and Sizewell C, have not been able to follow the construction timescales they predicted during their examinations. It is therefore essential that NGET do not arbitrarily scope out projects which are known to be delayed based on their originally predicted timeframes. Similarly, it is important that Sea Link consider the implications of delays to their own project. ESC is significantly concerned about the cumulative impacts of the Sea Link project alongside other significant infrastructure projects; it is essential that the assessment undertaken is robust to ensure the full extent of the impacts are understood and appropriate mitigation measures are provided. This includes the consideration of cumulative impacts outside the identified peak construction year.

12.9 Community Compensation

- 12.9.1 If the scheme is consented by the Secretary of State, there needs to be adequate compensation for the communities that will be adversely affected. The Council would welcome early engagement with the applicant on this matter.

12.9.2 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.

13.0 Detailed Comments from Technical Officers

13.1 Design and Conservation Comments

13.1.1 Converter Station Design

1.1.5: It is unclear how the completed converter station will appear, as it is noted that it could be 'up to 26 metres high, plus roof mounted equipment, which may include lightning protection, aerials and walkways. These factors are important in considering visual impact. Likewise, regarding the perimeter fencing to enclose and area of approximately 6.5 hectares.

1.1.6: Positive consideration of design is welcome; however, this would need to take account of the surrounding landscape and the setting of heritage assets in the vicinity.

2.1.4: As the surrounding landscape is largely undeveloped ('unspoilt') this needs to be taken into account, as well as the setting of Wood Farmhouse and Hill Farmhouse, Grade II Listed Buildings. It needs to be stressed that the combination of agricultural land as well as the patches of woodland which define the area strongly contribute to the setting of the above listed buildings, as well as other surrounding heritage assets, in terms of both their character as well as understanding their context and historical development. It is suggested that colour be considered in light of the surrounding landscape.

2.2: It is not considered that the enhanced elevations approach would be appropriate. While acknowledging the deliberate choice of colours in regard to the surrounding landscape, the structure will likely still remain conspicuous and visually impactful. This approach may also result in harm to the setting of surrounding heritage assets. It would be useful to have existing examples displayed to better understand the potential visual impact.

2.2.3: It is noted that the converter station will likely be visible from the B1119, increasing its visual impact.

2.3: It is unclear how the use of coloured horizontal banding can be applied successfully. While the illustration provided shows a relatively seamless integration with both land and sky, in reality that would depend on being in a specific location and looking at a specific angle. The change of seasons, as acknowledged in 2.2.2, would invalidate the colour scheme chosen for at least part of the year, making the structure

more visually intrusive. It would be useful to have existing examples demonstrated to better understand the potential visual impact. It is not considered that the use of coloured banding would therefore be appropriate, as it may result in harm to the setting of surrounding heritage assets.

2.4: The green roof approach may offer the best approach in terms of mitigating visual impact and minimising harm to the setting of the surrounding heritage assets. It appears to allow the structure to be incorporated into the landscape unobtrusively. It would be useful though to have existing examples displayed to better understand the potential visual impact.

2.5: While acknowledging that the agricultural barn approach seeks to evoke the district's existing rural architecture, it is considered that the scale of the structure will greatly exceed the size of most local farm buildings. It is noted that while the gabled roofs also appear to have been chosen to reflect local agricultural architecture, their repetition as illustrated would likely be overly conspicuous, increasing the building's visual impact. It would be useful though to have existing examples displayed to better understand the potential visual impact. It is considered that the agricultural barn approach would be appropriate, as it may result in harm to the setting of surrounding heritage assets.

2.6: The colour and curve approach may be acceptable, though it would likely need to be carefully designed to be successful. However, there is still the potential that this design may result in harm to the setting of surrounding heritage assets. It would be useful though to have existing examples displayed to better understand the potential visual impact.

2.7: The kinetic approach is unlikely to be appropriate due to its conspicuousness and distinctive alienness in the surrounding landscape. This is noted in 2.7.3, which acknowledges that this design choice would likely be better suited to the Kent site.

13.1.2 Preliminary Environmental Information Report

5.3.5: Setting erroneously only considered in terms of intervisibility, whereas it also includes the historic relationship between heritage assets and the wider landscape.

PEIR: Vol. 1, Part 2, Chapter 4 (Cultural Heritage)

2.4.1.4 - 2.4.1.5: These should be included as appendices in the document.

2.4.4.5: Limited understanding of setting has been incorrectly based solely on intervisibility. Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (2017) states that setting may also be understood through 'our understanding of the historic relationship

between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each’.

2.4.6.2: Figure 1.1.2 not included in document.

2.4.6.3: Figure 2.4.2 not included in document.

2.4.7.3: Is a full list of listed buildings available?

2.4.8.3 – H02: East Suffolk Council should always be informed of any discovery.

MSF23092: Friston Hall a Grade II Listed Building, therefore development in its curtilage is likely to impact its setting and significance (not acknowledged in the preliminary assessment). More information required on the loss of a formal landscape historically to better understand impact on the setting of the listed building.

MSF43589: No comment (archaeology)

2.4.9.14: No justification has been given for the scoping out of the churches of St John the Baptist or Mary Magdalene. As medieval structures, these churches have a complex relationship with the surrounding landscape, as historic religious centres, and therefore their setting is likely extensive. Further information is required if they are to be screened out.

2.4.9.14: Blank third bullet point.

2.4.9.14: Disagree that Sternfield House, Little Moor Farmhouse, High House Farmhouse and Hill Farmhouse merit scoping out.

2.4.9.14: Agree with conclusion regarding Friston Post Mill.

LB1231179: Disagree that existing outbuildings will provide screening, as there are extensive views east from the east elevation of the farmhouse.

Likewise, regarding vegetation, for though there are trees surrounding the house, these are largely directly south and will provide limited screening looking south-east. Unclear what statement ‘farmhouse was not designed to have long ranging views over the surrounding landscape’ means. The wider agriculture landscape contributes to the setting of the farmhouse by reinforcing an understanding and appreciation of its historic function, which continues to the present. Similarly, while not designed as a landmark, the farmhouse nonetheless provides a prominent visual marker in the landscape.

Agree with the statement 'it is, however, acknowledged that the agricultural fields that surround the farm represent a component of the farms setting, and the loss of some of these fields will erode the agricultural setting of Wood Farm'.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

LB1268178: Whilst the description of significance is largely agreed with, it should be noted that Wood Farm historically formed part of the Hurts Hall estate, and therefore is considered to form part of its setting.

Whilst the conclusion on impacts are largely agreed with, it should be noted that Wood Farm is considered to form part of the setting of Hurts Hall and hence should also be taken into consideration. Similarly, views from the former track leading to Wood Farm should be taken into consideration.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

LB1215749: The description of significance is largely agreed with. However, we would disagree with the assertion that 'it does not appear to have been designed to be a prominent feature in the wider landscape'. Buxlow Manor appears to have been designed as a high-status dwelling, apparently dating from 1678 according to the listing description. Built to an E-shape plan with three prominent Dutch gables, the building is clearly intended to advertise its status, and as such may be considered a prominent feature, regardless of current vegetation and screening. It is unclear how well screened the house would be from the proposed converter station, though it is acknowledged that the existing hedgerows would provide some mitigation. However, it does appear that there are clear views across the valley looking west and south-west. It is possible that the proposed converter station could be even more visible from the first and second stories of Buxlow Manor. I also disagree with the statement:

"the house does not appear to have been designed to be a prominent feature in the wider landscape and was rather built to occupy a key location on the north side of the green of the settlement of Knodishall Green".

for the reasons given above.

The significance of effect given is 'not significant', however this does not appear to comply with table 2.4.7.

LB1287864: The description of significance is largely agreed with but note that no consideration has been given to the church's wider setting. As a medieval religious

structure, Friston Church likely has a complex relationship with the surrounding landscape, being a local religious centre.

It is agreed that views of the convertor station from the church would likely be limited due to existing vegetation and screening. However, it is less certain if the proposed structure would affect the church's visual dominance in the landscape, especially from further views.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

The following heritage assets be considered in regard to both the Saxmundham and Friston sites:

- Saxmundham Conservation Area
- Church of St John the Baptist, Saxmundham (Grade II* LB)
- Oak Tree Farmhouse (Grade II LB)
- Hill Farmhouse (Grade II LB)
- The Limes (Grade II LB)
- Garden Cottage (Grade II LB)
- Church of St Mary Magdalene, Sternfield (Grade II*)
- Sternfield War Memorial (Grade II LB)
- Sternfield House (Grade II LB)
- High House Farm (Grade II LB)
- Little Moor Farm (Grade II LB)
- Woodside Farm (Grade II LB)
- Friston House (Grade II LB)
- Friston War Memorial (Grade II LB)
- Nos. 1 and 2 (Church Walls) and 3 and 4 (Church Walls Cottage) (Grade II LB)
- Track previously identified as an Non Designated Heritage Asset

13.2 Ecology Comments

It is noted that there is a significant amount of ecological survey work that remains to be undertaken and therefore it is not possible to provide detailed comment on all potential impacts at this time.

13.2.1 Statutory Designated Sites

The PEIR identifies that the landfall location for the cable limit of Deviation (LoD) crosses part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) and RSPB North Warren Reserve. The assessment assumes that this site will be crossed using a trenchless technique (e.g., at section 2.3.5.55 and Table 2.3.14) and therefore direct

impacts on the designated site will be largely avoided, resulting in a Negligible Adverse, Not Significant effect on the SSSI. However, it is unclear whether the assumption that this type of construction method is deliverable in this location is justified. In the absence of adequate demonstration that trenchless installation is achievable, the selection of this landfall area means that the project has the potential to result in a much greater impact on the designated site than is set out in the PEIR. The use of a trenchless technique (such as horizontal directional drilling) comes with its own potential construction impacts, such as the risk of ‘frack out’ of the drilling compound/material (e.g., bentonite), the risk of such impacts occurring and assessment of the impacts which they may have on the designated sites and the species which it supports must be assessed and addressed as part of the proposal. Justification of the selected landfall location and adequate demonstration that the proposal can be delivered without result in adverse impacts on the designated site are essential.

It is also noted that assessment of the potential hydrological impacts from trenchless construction on the designated site remain unassessed at this time, although Table 3.2.22 states that the project will “Implement measures to ensure no significant hydrological impact on water levels in North Warren RSPB Reserve”. In the absence of such assessment, it is unclear what measures could be implemented to address this potential impact. This must be adequately assessed and addressed as part of the project.

13.2.2 Non-Statutory Designated Sites:

The selection of the route to avoid County Wildlife Sites (CWSs) is welcomed.

13.2.3 Protected Species – Bats:

As recognised in section 2.3.5.32 and Table 2.3.7, new bat survey guidelines¹ have recently been released. It must be ensured that bat surveys programmed for 2024 are undertaken in accordance with these guidelines, and that where necessary surveys undertaken in 2023 that significantly deviate from the new guidelines are either updated or their validity justified as part of the Environmental Statement.

Section 2.3.5.34 makes reference to bat activity transect surveys which have been, and which are being, undertaken. However, it is not clear which transect routes have been selected. Further information on this is required so that it can be ensured that all necessary areas have been adequately covered by these surveys.

Section 2.3.5.39 identifies that bat activity static detector surveys are yet to be undertaken but are programmed for 2024. It must be ensured that such surveys have sufficient seasonal coverage to meet the best practice guidelines and appropriate inform the assessment within the Environmental Statement.

Table 2.3.8 sets out the ecological significance categories proposed to be used as part of the Environmental Statement. The applicant's attention is drawn to the guidance on this matter for assessing impacts on bats which is set out in the newly published Bat Mitigation Guidelines 2. It is requested that the Environmental Statement takes account of this guidance in relation to assessing potential impacts on bats.

13.2.4 Protected Species - Hazel Dormouse:

In addition to the use of nest boxes/nest tubes to survey for hazel dormouse (sections 2.3.5.40 and 41), it is strongly recommended that footprint tunnels are used in conjunction with the nest boxes/tubes. Whilst it is acknowledged that this method alone is not currently accepted as demonstration of absence of this species from a site, it is known to increase the likelihood of detection of dormice if they are present. It is therefore considered to be a good companion technique, alongside nest boxes/nest tubes, for establishing presence of this species.

13.2.5 Breeding and Wintering Birds:

It is noted from sections 2.3.5.22 and 2.3.5.25 that the wintering and breeding bird surveys undertaken to date have predominantly been carried out from public rights of way. Whilst the report states that this "enabled good coverage", no plans of this coverage are provided and therefore it is impossible to confirm whether this statement is correct. Given the high value of many habitats in the potential cable corridor for wintering and/or breeding birds, and the need to collect at least two seasons of survey data (as per section 2.3.5.55), it is essential that it is ensured that sufficient survey coverage has been achieved, otherwise there will be insufficient information available to allow full assessment of the likely impacts of the proposals on wintering and breeding birds. Many of these bird species are also features of the statutory designated sites in the area, and although the project seeks to avoid any direct impacts on such sites, given the potential for disturbance impacts as a result of construction it is also essential that adequate survey information is available to assess such impacts.

13.2.6 Assessment of Potential Ecological Impacts:

As set out in the PEIR and above, there is a considerable amount of ecological survey information which is still to be gathered, as well as a considerable amount which has been gathered but not made available to consideration. It is therefore not possible to provide detailed comments on all of the likely ecological impacts, or avoidance, mitigation or compensation measures which may be suitable to address these. However, based on the information provided in the PEIR I have the following initial comments.

13.2.7 General approach to avoidance and mitigation measures:

Whilst it is acknowledged that the project seeks to embed a number of ecological avoidance and mitigation measures within it, it is concerning that many of these, such as the use of trenchless construction techniques or deployment of physical noise mitigation measures, are caveated with the phrase “where feasible and necessary”. It is unclear how this test will be determined or what will happen if it is decided that a particular measure is necessary but not feasible? Many of these potential measures are related to avoiding or mitigating impacts on areas of high biodiversity importance, including nationally and internationally important nature conservation sites, and if such measures are deemed to be unfeasible then significant adverse impacts are likely to occur. If adequate measures following the mitigation hierarchy (avoid, mitigate, compensate) cannot be identified and implemented then unacceptably harmful ecological impacts will occur.

In addition to the embedded measures described in the report, it is noted that no reference to the use of narrowed cable construction working widths near particularly sensitive habitats is included. This is a measure which has been secured as part of other similar projects in the district, and it should form part of this proposal unless it is adequately justified why it is not necessary.

Finally, Table 2.3.13 (Preliminary assessment of direct loss of habitats during construction or decommissioning) should identify that the first step is to seek to avoid direct habitat loss, particularly permanent loss at the converter station and substation sites, through the design of the infrastructure. Only if it is appropriately justified that full avoidance is not possible should mitigation measures be pursued.

13.2.8 Assessment of specific ecological impacts, Leiston-Aldeburgh SSSI:

Table 2.3.17 (Preliminary assessment of disturbance of designated sites during construction or decommissioning) states that “Leiston-Aldeburgh SSSI is in the same location as Sandlings SPA and will therefore be similarly affected”. However, not only does the SSSI boundary not overlap with the SPA boundary at the landfall location, the SSSI also has a significantly larger suite of features for which it is designated. The assessment must take account of this, it cannot be assumed that measures potentially suitable for avoiding or mitigating impacts on SPA qualifying features are also suitable for SSSI features.

13.2.9 Assessment of specific ecological impacts, Hedgerow loss:

The assessment presented in the PEIR (e.g., Table 2.3.16) suggests that the applicant considers that hedgerow loss can be restored in 1-2 years. No justification for this timescale is provided, nor is it clarified what is meant by restored. It is considered highly unlikely that new hedgerow planting to either infill created gaps or replace

lost hedgerow lengths will be sufficiently mature in 1-2 years to mitigate for that which is lost. Whilst the Environmental Statement (ES) may consider such an impact to be temporary, it is essential that it clearly defines over what length of time such a temporary impact is likely to occur. This is to ensure that the assessment within the ES realistically considers such impacts and the time that it will take for mitigation measures to take functional effect.

13.2.10 Assessment of specific ecological impacts - Operational Noise:

Table 2.3.24 (Preliminary assessment of disturbance of birds and other fauna during Operation) concludes that disturbance of birds and other fauna during operation of the project would be at worst Minor Adverse, Not Significant in the absence of any mitigation measures. However, the justification provided only relates to maintenance visits during operation and does not address whether the operation of the equipment at the converter station and substation sites may give rise to disturbance impacts such as through the generation of increased noise (including high frequency noise). This should be assessed as part of the ES to determine whether any significant impacts from such sources may arise and whether any avoidance or mitigation measures are required to address these.

13.2.11 Assessment of specific ecological impacts - Shading of riparian habitats:

Table 2.3.36 (Preliminary assessment of shading impacts on riparian habitats during Operation) concludes that with mitigation the impact from shading on the River Fromus from a new crossing would be Minor Adverse to Negligible, Not Significant. However, the mitigation identified (bridge designed to a height:width ratio of 0.7) is stated as being “where practicable”. As with measures described as “where feasible and necessary” discussed in section 3.1 above, it is queried what will be concluded if the necessary mitigation is determined not to be practicable. The conclusions presented in the ES should only be based on deliverable mitigation measures. If it is unknown whether a particular mitigation measure is deliverable, then the assessment must be made on a worst-case basis (i.e., that the mitigation measure is not deliverable).

Please also note in Table 2.3.36 that the receptor is the River Fromus not the River Frome.

13.2.12 Co-location Options:

Whilst in principle the exploration to co-locate infrastructure for other projects as part of this project is supported, this is only if it can be demonstrated that to do so would significantly reduce the cumulative ecological impacts from all of the relevant projects. This must include not only physical interactions, but also temporal ones. Co-location should not result in the lengthening of impacts (particularly disturbance

type impacts) as a result of requiring significantly increased construction timeframes or requiring project sequencing which significantly extends or overlaps construction periods.

It is also noted that co-location could result in this project installing cable ducts for use by projects. Whilst again in principle this may have merit, experience from other projects in the district where a similar approach has been taken has identified that risks such as duct failure ahead of following projects commencing must be considered as part of the overall assessment of the option.

13.2.13 Biodiversity Net Gain

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

13.3 Noise and Vibration Comments

The Applicant has provided a variety of assessments and information which will continue to be scrutinised and assessed and will form the basis of ongoing discussions throughout this process. This response should be read in conjunction with ESC's scoping consultation response much of which is still relevant in terms of our expectations and That response below for completeness.

13.3 Operational Noise and Vibration

13.3.1 Opening Matters

In terms of Operational Noise and Vibration it is important to note our fundamental requirements which have been communicated to the applicant both verbally and in writing and appear in their assessment documents. Our current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications but is equally relevant here and has been stated for this and other DCO projects we are involved with:

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

considered should be explained and the achievable noise level should be identified and justified.

Due to the size of these types of projects the 5dB below background is an aspirational target and one ESC ask developers to consider as the appropriate limit, deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which will also require robust justification, this should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise adverse noise impact and avoid significant adverse impact.

The Applicant has previously stated that it is their intention that the development, if consented, will have a rating level below background sound levels which broadly accords with our expectations in this regard subject to those levels being agreed. The council recognises that an initial assessment has been undertaken and a relatively conservative approach adopted in the determination of representative background sound levels has been taken, further assessment of the relevant documents is required before agreement can be made but the representative backgrounds currently suggested appear to be reasonable and the applicants adoption of the night time levels as those of most significance in terms of impact is accepted as the correct determinant to base future targets on in respect to suitable rating levels.

Due to the low background sound levels in this area, particularly at night, it is extremely important that noise levels from the development are avoided, mitigated or minimised to ensure these background sound levels are not subject to “noise creep”. This is particularly important given this sites potential as a co-location site for at least one other similar project making the reduction of individual project impact key to the prevention of cumulative impact. It is not enough to say that future impact is the responsibility of future projects, and it must be taken account of now, the adoption of below background rating levels will effectively aid the prevent of cumulative noise impact by preventing the increase in background sound level that future projects would adopt for their assessment.

As stated above due to the likelihood that there will be future projects using this site background noise creep is a significant issue. The applicant mentions absolute levels in their documents and assessment, and this is assumed to mean that a site noise level of 35db may be considered. If this is the case, it will be resisted in the strongest terms in favour of a below background rating level. Whilst it is accepted that BS4142 allows for consideration of absolute levels in certain circumstances the cumulative potential for this site and the current character of the area means that all efforts should be made to prevent background sound level creep which the adoption of a 35dB site level would not. An absolute level would also not take account of any acoustic penalties that a rating would, given the types of plant to be used tonality, impulsivity and

intermittency are all likely to be considerations. If this is to be considered in line with section 11 1) of BS4142 we will require a robust assessment to show that adoption of absolute levels is as or more protective than rating levels and would require consideration of acoustic character of those levels in line with section 11 2).

The Acoustic character of the area is quiet rural residential in nature and this application and development has the potential to introduce a persistent commercial and industrial noise into that character, this should hold considerable weight in terms of contextual the considerations required by BS4142 when assessing the significance of impact in addition to assessed and modelled noise levels. Projects of this scale have the responsibility and means to ensure that they achieve the best possible outcome, and this begins with a thorough assessment considering all aspects of an introduced sound or noise and not simply relying on calculated levels where there is an inherent uncertainty but also undertaking a robust subjective assessment considering the character of the area and the character of the noise.

It is essential that any changes in design and location of substations must be considered in terms of noise assessment, this must be in terms of Sea link in isolation and cumulatively at the site with future projects dependant on the information available.

In terms of cumulative assessment and impact whilst the Saxmundham substation site is an area of particular concern should further projects co-locate there the applicant must be extremely mindful of cumulative impacts in relation to the numerous other projects in the area particularly in terms of construction noise, whilst there may be some assumed deconfliction to construction dates at this time these may change and as such review and re-assessment should be embedded in this process and project.

The following comments are made on the assessment and what has been scoped for assessment.

- a) Firstly, in terms of overhead lines, Significant adverse effects from noise from new overhead lines has been deemed unlikely and has been scoped out of further assessment. Further assessment needs to be undertaken to quantify the expected unlikely significant adverse effect and to quantify whether there are adverse effects and cannot be assumed.
- b) Secondly, the impacts from the connector substation at Friston have been scoped out on the basis that switchgear noise emissions would be impulsive in character and operation would be infrequent, there is no indication as to sound levels, how impulsive or how infrequent, neither is there consideration of the impact of this matter cumulatively with other projects and whether there is a point where the number of projects and the increase in equipment will cause an impact. It is very important to note that the Friston connection substation is part of the site rating levels and therefore it is a site constraint, the applicant

needs to be very confident that introduction of further or different equipment will not impact that constraint.

Whilst considering the above comments the applicant's assessment has indicated that with mitigation the sound levels at all nearby Noise Sensitive Receptors will be below background sound levels except for one location where background is achievable. This is welcomed by ESC and aligns with the expectations previously stated. We look forward to working with the developer going forward to exhaustively assess whether further reasonable improvements can be made to ensure this project is the best it can be in respect to noise and vibration.

13.3.2 The operational noise scoping response has been included below.

Operational noise and vibration scoping:

The proposed study area of 1000m from the proposed substation sites and the Friston Site is accepted along with the developer's emphasis on closer proximity Noise Sensitive Receptors. In respect to location the developer is advised that the National Grid Connector Sub Station at Friston is included in the EA1N and 2 Rating level for the site and as such this is a site wide constraint that they will have to meet.

The developer has proposed BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS4142) in respect of operational noise assessment and this is accepted. The developer has also stated that the DCO will contain a requirement with an appropriate noise level, and this will need to be determined as a rating level using BS4142 in order to take account of any acoustic character to sound emissions and importantly to take account of the local context.

In respect of that context the developer has correctly stated that the majority of the area is quiet rural and residential in nature, the potential for the introduction of a 24 hour a day 7 days a week industrial noise source to have significant adverse impact exists and this is to be avoided along with adverse impact mitigated and minimised in line with NPS EN-1 and the Noise Policy Statement for England.

The developer is also required to consider cumulative effects with other committed or consented major projects, principally, but not necessarily limited to, Sizewell C and Scottish Power Renewables EA1N, EA2 and EA3 as well as other proposed major projects such as Euro link and Nautilus where there is information available to consider. "Noise creep" is a significant issue with the number of projects both potential and consented and needs to be considered, minimised and where possible prevented entirely.

The developer ascribes significance criteria to operational noise in line with NPS EN-1 and states that a significant adverse effect is considered to occur at large, or medium

magnitudes of impact which Table 2.10.9 describes as a rating level between 5 and 9dB above background and more than 10dB above background respectively. As Significant Adverse Effects are to be avoided it is therefore assumed the developer is expecting to achieve 4dB above background or less as a rating level.

Our current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications but is equally relevant here and has been stated for other DCO projects we are involved with.

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

Due to the size of these types of projects the 5dB below background is an aspirational target and one we ask developers to consider as the appropriate limit, deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which we will also require robust justification for, this should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise noise impact although they appear very familiar with these principles which is comforting at this stage. Section 2.10.7.20 also Implies that adverse effects will be avoided, and the rating level will be set below background so that the impact is negligible as is “standard practice”, if this is the case it is to be welcomed.

The overall expectation for operational noise is that a robust assessment will be undertaken using BS4142, that an appropriate rating level will be proposed relative to an appropriate representative background sound level and that it will inform design and mitigation so as to reduce noise impact to an absolute minimum. There will be a need for a requirement in the DCO and dependent on the rating level that is proposed there may be a need for a further requirement with a commitment to reduce that rating level further should it be possible to do so at a later detailed design and implementation stage, the need to keep impact from operational noise to an absolute minimum cannot be understated and we will require robust justification in reaching agreement.

In terms of scoping operational vibration has been scoped out and this is accepted, all areas that have been scoped in are agreed. The developer has however stated that

noise from switchgear and emergency equipment such as generators and compressors should be scoped out, this is currently not agreed as it will be dependent on the likely frequency, duration and mitigation for these events and therefore further justification should be provided.

13.3.3 Construction Noise and Vibration

The Applicant has committed to using BS5228 - Code of practice for noise and vibration control on construction and open sites along with the ABC methodology within that code, this accords with other similar projects in the area and is accepted. Thresholds have been set relative to the lower noise thresholds (Category A) as detailed in Section E.3.2 of BS 5228-1 (the 'ABC' method) and are proposed to be used throughout as a worst-case, this is also accepted.

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.

The magnitude of impact has been determined in line with The Design Manual for Roads and Bridges (DMRB) which is designed as the title suggests for the construction of roads and bridges, ESC is not therefore convinced of its appropriateness here.

The magnitude of impact assessment uses LOAEL and SOAEL in the determination of magnitudes. It is a concern that the highest level of magnitude, Large, is above +5dB above SOAEL and Medium being equal to or above SOAEL and below +5dB, given that SOAEL is a barrier to consent and must be avoided levels beyond SOAEL should not form any part of a scale for assessment as it should never occur, to include such a

criteria provides a false representation of the scale of magnitude and downplays the actual magnitude of impact, a medium impact being the highest theoretically achievable level of impact.

Construction Vibration has been determined in line with BS5228-2 and this is accepted, LOAEL has been set a 0.3 mm/s PPV and SOAEL a 1.0 mm/s PPV which appears to be reasonable.

In terms of vibration, ESC has similar comments in respect to the use of DMRB and the inclusion of above SOAEL magnitude levels in the magnitude of impact thresholds, SOAEL being a level to be avoided.

As the report acknowledges that Best Practicable Means (BPM and taken to be as defined by section 72 of the Control of Pollution Act 1974 and further described in BS5228) will be implemented, this should be committed to at all times with work and any noise mitigation carried out to BPM to ensure noise and vibration are kept to a reasonable minimum and not just below the relevant thresholds. BPM is a critical control point for a project of this scale.

A road Traffic Noise Assessment has been carried out, this is a highways authority matter which in this case is Suffolk County Council and we will defer to them in that regard.

The Construction Noise and Vibration response for the scoping exercise is copied below for completeness.

13.3.4 Construction noise and vibration scoping response

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

The developer has stated that BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration (BS5228), and specifically the “ABC” methodology of those standards, are to be used in relation to impact from construction noise and vibration and this is accepted as suitable.

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

The developer has provided an Outline Code of Construction Practice (OCoCP) which includes noise and vibration management as is expected for this type of development and should be secured in a requirement in terms of compliance. The OCoCP provides a relatively high-level view of noise and vibration management and mitigation and provides for Construction Environmental Management Plans (CEMPs) to provide the detail in respect of specific works. The Local Planning Authority should have some input into construction activities in terms of mitigation and monitoring for noise and vibration and therefore should be included in approving the CEMPs, if this is not possible and that position is justified there may be a need for a more detailed Noise Management Plan (NMP) as an appendix to the CoCP and consideration of adopting a Control of Pollution Act 1974 Section 61 approvals process.

The developer should produce a detailed complaints and monitoring plan including when and how they intend to inform the Local Planning Authority, this should form part of the OCoCP, CEMP, NMP or S.61 as appropriate.

The developer has considered noise and vibration from construction traffic, it is assumed this is in respect of highway noise and vibration which is a Highways Authority matter, and that site construction traffic noise and vibration will be considered in respect of the overarching construction noise and vibration requirements under BS5228 and in the OCoCP.

The developer has ascribed significance in respect of construction noise and vibration, and this should be in line with the BS5228 “ABC” methodology as proposed.

13.3.5 oCoCP:

The oCoCP as an outline document is accepted and it is noted that there are further opportunities to assist in its development.

The Council which the applicant to note the following examples:

- a) Working Hours – Saturday working after 13.00 is not currently acceptable without robust justification. A comparable project has Saturday 07:00 – 13:00 as a requirement. Work can be undertaken outside of these hours as stated in the oCoCP, but this should be with Local Authority agreement to ensure that the works are indeed necessary. Necessity to carry out works out of hours is a key principle of BPM, if you don't need to do it at a sensitive time then you shouldn't. s61 agreements could be considered by the applicant as required.
- b) Complaints – the oCoCP describes an internal complaints procedure but this does not require engagement or notification with East Suffolk Council. We

would expect to be informed of complaints received and in a timely manner, along with any action taken.

- c) Emergency Action Plan – ESC should be informed of any incidents identified under the Emergency Action Plan so that we can consider if we need to be involved, and so that we have information should the public come to us for assistance.
- d) Contamination – There may be something in the relevant documents but the OCoCP should contain full reference to a discovery strategy should unexpected contamination be encountered along with a plan to resolve the situation and a commitment to seek agreement with us and the Environment Agency in any matter relating to the investigation and remediation of contamination discovered. This should broadly accord with the steps of our unexpected contamination TCPA condition.
- a. Best Practicable Means – This is a critical control point for this and all NSIPs in terms of mitigation of Noise and Vibration, and a principle that should spread across all areas of the project, doing the best they can to prevent impact. In terms of the principle of BPM as defined by Section 72 of the Control of Pollution Act 1974 and further defined in documents such as BS5228 it is noted that the relevant BPM for each work stream will be in the CEMPs. Presumably we will have sight of these and if not, we will need to be provided with at least the BPM work and mitigation should a problem arise to ensure the relevant BPM is actually in place. Internally there should be a principle of reviewing BPM in the event of a complaint to ensure that the work is being carried out to those principles, this is a precedent with other comparable projects.
- e) Health and Safety should be separated out from Environmental Considerations to avoid confusion.
- f) Construction Method Statements; CEMPs; Managements Plans – we need to be clear with the document hierarchy and where detail of mitigation (noise, dust, water, vibration and soil) will be found. The documents should be submitted and approved to ESC.
- g) It is not clear where the LOAELs in Table 2.10.8 have originated from.
- h) Table 1.4.A.2: Control and management measures – NV03 – we are a little concerned that this paragraph is not committing to the same rating levels (or absolute if more appropriate) as are discussed elsewhere (below or at worst matching background).
- i) Table 1.4.A.2: Control and management measures – GG13 – this paragraph refers to ‘plant’ and vehicles but only has commitment to vehicle standards and not plant. Please see comments in the air quality section of this response from more detail on this subject.

Whilst it is expected that there will be numerous management plans that exist below the oCoCP this document should contain sufficient information and commitments to prevention, minimisation and mitigation of impacts associated with construction to

provide confidence that Best Practicable Means in its wider context across all topics will be applied.

13.3.6 Inter Project Cumulative Effects:

Table 2.14.4 – Matrix summarising Stage 1 + 2 of the Inter Project Cumulative Effects: ESC is concerned that the peak year has been used as a basis for assessment and not progressing to the next stage. For example - A12 bypass; traffic, transport and air quality – not taking to stage 3 assessment due to peak year not occurring until after the bypass is operational. It is the same for many of the Sizewell C associated developments. The concern is that firstly, there may be impacts from this project (Sea Link) prior to peak year which should be considered; and secondly, timelines slip and change – sometimes significantly – potentially on all projects.

Regarding air quality – ESC may have more comments after the Highways Authority has had a chance to comment as they may identify areas of concern or impact that have not been considered.

It is suggested that if any project is carried through for stage 3 assessment for traffic and transport, then this should automatically also be put through for consideration of the impact on air quality if congestion related.

All areas of impact including air quality, dust and noise and vibration should be robustly assessed for inter project cumulative effects, the developer should be mindful that a review and re-assessment process should be implemented to ensure any changes to various project timelines are taken account of and addressed to avoid unexpected cumulative impact where previously impacts were low or scoped out on the basis of deconfliction between projects.

13.4 Private Water Supplies Comments

13.4.1 The district has numerous Private Water Supplies that could be sensitive to some of the construction methods likely to be employed by the project (such as trenchless ducting and dewatering if required), the developer should engage with ESC to ensure that these Private Water Supplies are considered and where necessary measures are taken to ensure that the supplies are not affected by works associated with Sea link.

13.5 Air Quality Comments

13.5.1 We acknowledge that a detailed air quality assessment will be carried out at the ES stage once further data is available. This is to include, but not limited to, emissions from construction site vehicle emissions; Non Road Mobile Machinery (NRMM); emissions from use of the back-up generator; and monitoring of air quality pollutants/dust. As has been recognised it is essential that cumulative effects with

other projects, with consideration of the impact of this project on traffic flows potentially some distance away, is included in the detailed assessment. Sensitivity tests for slippage of timelines should also be considered – both slippage within this project and for other projects.

- 13.5.2 We agree that air quality impacts associated with the operational phase vehicle emissions can be scoped out for further assessment.
- 13.5.3 Emissions from Construction Site dust – we acknowledge that the assessment for dust has concluded that a high level of mitigation is required. It is agreed that a Dust Management Plan for the project should be developed, submitted to and agreed with ESC.
- 13.5.4 There is some consideration of NRMM within the current documents and we acknowledge that this is to be considered further in an air quality assessment at the ES stage. In line with some other projects and given the potential impact on local air quality from the numerous additional NRMM in use within the surrounding area local to this project, we would like to see a commitment to reducing emissions from this source as much as possible. This should involve a commitment to use of renewable energy sources such as solar banks for charging batteries where possible, use of electricity or batteries, with use of diesel as a last resort. A commitment to use of Stage 4 NRMM as a minimum, and stage 5 where possible should be made.
- 13.5.5 The commitment to Euro standards made in the CoCP for vehicles associated with the site is positive. This will require monitoring for compliance.

13.6 Land Contamination Comments

- 13.6.1 The developer has undertaken a preliminary contaminated land risk assessment which has not indicated any locations where contamination is likely to exist beyond a low risk. This Assessment has been carried out in line with the principles of the Environment Agency's Land Contamination Risk Management (LCRM), this is the applicable guidance in this respect. This is clearly based on current knowledge and locations should be reassessed on a case-by-case basis should further information come to light.
- 13.6.2 Whilst the current risk of contamination is low and it is accepted that much of the route is isolated and agricultural or wild in nature this does not preclude the possibility of unknown contamination that may be encountered during the development given the amount of excavation required. The developer should provide contaminated land management plan which covers a robust discovery strategy and procedures for managing contamination should it be found unexpectedly; this must include consultation and agreement with the Local authority in respect of investigation and remediation required in the event this scenario occurs.

13.7 Landscape Comments

13.7.1 Non-Technical Summary

Para 5.1.5 and later contains a potentially misleading reference to a landscape character area (Fromus Valley, Heveningham and Knodishall Estate Claylands *coastal landscapes*) from Suffolk Coastal Landscape Character Assessment. The main name is correct but also includes reference to coastal landscapes. It may be that this is a reference to the eastern and therefore coastal side of the Landscape Character Area but this should be clarified for the avoidance of doubt.

13.7.2 PEIR

The setting out of the policy framework is comprehensive and considered fully inclusive.

The consideration of the AONB Special Qualities is appropriate and welcomed.

3.1.1 It is agreed operational lighting should be scoped in given the rural location of converter station.

3.1.6 Although the current PEIR study area has been agreed with ESC, we welcome the proposal to keep it under review as the project evolves.

2.2.8.32 Visual receptors - Noted but the Council has concerns about some of the Value assessments given to the selected viewpoints in section 2.2.8.32 Table 2.2.17. The rationale for attributing Medium value to some PROWs and High and Very High to others is not wholly clear. We recommend that the developer discuss these issues with the Council before the LVIA is progressed any further.

2.2.9 Mitigation Measures - Draft Mitigation Measures Figures 1.4.3 and 1.4.7 in PEIR Vol 3 Part 1 Chapter 4 and Table 1.4.F.6 are noted and the Council welcomes ongoing dialogue to achieve the optimum outcome for the Saxmundham site. N.B. the reference to the Richborough Energy Park and the wider marsh landscape would seem to be incorrect in respect of the Saxmundham site and probably refer to the Kent converter station site.

In respect of Control and Management Measures (2.2.9.3), where retention and protection of existing vegetation (trees and hedgerows) is a key component of the mitigation strategy, and indeed as a general principle of the project as a whole, the Council will expect pre-commencement tree and hedgerow surveys to be carried out to identify the most important landscape components and how to protect them during construction.

It is recommended that cleared hedgerows should be chipped and re-used as mulch for new planting areas.

2.2.9.4 - Noted but the Council will need to understand how wider landscape mitigation measures can reliably be delivered on land outside Order limits, e.g., along B1119 out of Saxmundham.

In respect of other matters relating to mitigation related issues:

Table 1.4.A.2 CoCP Control and Management Measures ref:

GG03 - The later production of a Landscape and Ecological Management Plan (LEMP) is noted but the Council recommends that the developer engages with its technical officers at the earliest opportunity to ensure a collaborative ongoing dialogue in respect of landscape mitigation matters.

GG08 and GG09 - The outline proposed measures are noted, but given their very high-level outline nature, further comment is unrealistic at this stage. The Council would welcome closer dialogue with the developer as more detailed proposals emerge.

LV01 and LV02 - The intention to retain vegetation where practicable is noted and the Council will expect retained vegetation to be fully protected according to recommendations contained in BS5837:2012 Trees in Relation to Construction (LV02 refers to this and is noted). Further, the Council will expect all proposed hedgerow crossings along the cable route and hedgerows affected by the converter station proposals to be assessed against the criteria for 'Importance' laid out in the 1997 Hedgerow Regulations. Where hedgerows meet the criteria for 'Importance' under the Regulations, the Council will have an expectation that these should be retained at least along the cable route and alternative solutions to open trenching put forward.

LV03 The proposed five-year aftercare period for reinstatement and mitigation planting is noted, but it should be understood that the Council will be requiring this five-year period to also apply to all replacement planting that covers any plant failures. i.e., it should be a rolling five-year period for all planting from the time of planting.

The limitations of replacing removed trees in a like for like basis in the vicinity of installed electrical cables is understood.

LV04 and LV05 Soil management proposals noted.

13.7.3 Preliminary Assessment of Effects

The assessment of anticipated Landscape Character effects at construction, maintenance (assumed to mean 'operation') and decommissioning seems acceptable and realistic at this stage, but issues emerging from finer details may form topics for further discussion.

As above, the preliminary assessment of visual amenity effects at construction, maintenance (assumed to mean 'operation') and decommissioning for the various viewpoints is noted.

The preliminary assessment is less clear on the role of mitigation planting in moderating the magnitude of effects over time. This needs to be made much clearer and once incorporated in the assessment, should include a realistic understanding of growth rates for new planting in the East of Suffolk. It needs to be understood that erratic and unpredictable rain fall patterns, notwithstanding the late summer and autumn of 2023, can be a very limiting factor in successfully establishing new tree and shrub planting. We expect to be advised of the anticipated growth rates as the LVIA progresses. Once understood and agreed, it is expected that photomontages/wireframes will include depictions of mitigation planting at Year 1, Year 5 and Year 15 post planting.

Issues surrounding the question of colocation at the converter station site and possible loss of mitigation planting relied on to moderate adverse visual effects arising from a single converter station need to be more clearly presented. A lack of project co-ordination could lead to unforeseen adverse effects on visual amenity through removal of previously relied upon mitigation.

Any acceptability of the proposed landfall option (S2) is wholly dependent on the use of trenchless technology to pass under the Leiston to Aldeburgh SSSI and North Warren RSPB bird reserve.

In respect of the potential impact of the proposed options for access road routes to the converter station:

South Eastern Access 1 Redhouse Farm - This option would seem likely to be of least landscape impact, but it still carries risk to hedgerows and landscape character.

Northern Saxmundham Access 2 off B1121 - This option will have direct impacts on Carlton Park which is a locally listed historic parkland, on TPOs, roadside hedgerows and the setting of the Saxmundham Conservation Area.

Southern Saxmundham Access 3 off B1121 - This option will have direct impact on the Fromus valley landscape, willow woodland block, and roadside hedgerows.

With regard to any proposed accesses onto the highway, these will need to be presented with accurate and realistic visibility splay requirements. It will not be acceptable for the Council to be forced to accept a whole string of post consent requirements for additional roadside hedgerow and tree removal needed to achieve splays that should have been properly assessed and presented as part of the DCO submission process.

13.8 Coastal Management Comments

13.8.1 The many consultation documents that appeared to me to have potential to include a reference to landfall impact assessments have been reviewed. Also key word searches undertaken including landfall, coastal and erosion. No reference to any consideration of coastal change or impacts on/from existing or planned coastal control structures within the consultation documents have been found.

13.8.2 The Strategic Options Report includes the following text:

1.3 Assessment Principles Applied by Decision Maker

1.3.1 Part 4 of EN-1 sets out the general policies that are applied in determining DCO applications relating to new energy infrastructure. Paragraphs 2.3-2.5 of EN-5 set out the general assessment principles in the specific context of electricity networks infrastructure. Those impacts identified in EN-1 include air quality and emissions, biodiversity and geological conservation, civil and military aviation and defence interests, coastal change (to the extent in or proximate to a coastal area), dust, odour, artificial light, smoke, steam and insect infestation, flood risk, historic environment, landscape and visual, land use, noise and vibration, socio-economic effects, traffic and transport, waste management and water quality and resources. The extent to which these impacts are relevant to a particular stage of a project, or are a relevant differentiator at a particular stage of the options appraisal process, will vary. In particular, some of these impacts are scoped out of this stage of the options appraisal process for this project.

13.8.3 It is therefore assumed that the developer has scoped out coastal change from this stage of the process. If that is the case, it is a significant oversight.

13.8.4 The section of coast proposed for the landfall is managed by the Environment Agency and so they should lead on responding to the developer.

13.8.5 ESC has responsibility for managing coastal frontages to north (Thorpeness) and south (Aldeburgh) of the proposed landfall and so would have an interest in the findings of a coastal change / management impact assessment.

13.9 Tourism & Economy Comments

- 13.9.1 The Sea Link project has the potential to adversely affect the east Suffolk economy throughout its lifecycle. The construction works at the landfall and along the cable corridor in addition to the construction works and permanent infrastructure at the converter station site and connection site will have an alone and cumulative effects that is of significant concern.
- 13.9.2 The visitor economy is one of largest sectors in east Suffolk, contributing c. £700m to the local economy annually and supporting around 11,000 (FTE) jobs. This accounts for 15% of all employment in the district. The continued success of the visitor economy is dependent on its reputation as a holiday destination, and the overall experience offered to visitors. The East Suffolk Visitor Economy Strategy identifies that together, the coastline, towns and places, natural landscape, and cultural offer present a compelling experiential proposition for the visitor.
- 13.9.3 ESC is concerned that the cumulative impact of Sea Link in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination, therefore negatively affecting the visitor economy throughout the lifetime of the project(s)
- 13.9.4 The impact of the Sea Link scheme will not be limited to the immediate vicinity of the proposed landfall, converter station, connection infrastructure and cable corridor locations. There is a high degree of interdependency between visitor destinations, employment, and supply chains within east Suffolk. Visitors move from destination to destination, employees need to access their employment, and the potential for the displacement of visitors during construction should not be ignored.
- 13.9.5 Should this project proceed, it is essential that this impact is appropriately considered, and sufficient mitigation is provided to support the continued success of the visitor economy.
- 13.9.6 ESC notes and welcomes the potential opportunity that Sea Link presents in generating 'direct and indirect temporary employment, training, and apprenticeship opportunities both on site and in the supply chain during the construction, maintenance, and decommissioning phases of the scheme.' However, the Council would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment within the visitor economy and wider business population are suitably assessed and mitigated.
- 13.9.7 The Council notes the opportunities to improve awareness of the wider energy sector across east Suffolk and the high value/high skill employment and apprenticeship

opportunities available. Greater information about workforce planning for the Sea Link project is required.

- 13.9.8 The decision maker needs to be able to balance the potential benefits which may result from the temporary employment, training and apprenticeship opportunities created against the disbenefits of the project.

13.10 Economic Development and Regeneration (EDR) Comments

- 13.10.1 In October 2022, EDR responded to the Sea Link non-statutory consultation expressing concern over the scheme's potential for negative socio-economic impacts affecting businesses, employment, and the wider economy. Especially the potential for cumulative adverse socio-economic effects resulting from multiple energy infrastructure projects scheduled for development in east Suffolk over the next decade.

- 13.10.2 Tourism is one of the largest economic sectors in East Suffolk and is dependent upon its perception and reputation as a visitor destination providing a high-quality experience to visitors. EDR continues to consider the visitor economy to be particularly sensitive to the cumulative effects described above.

- 13.10.3 EDR are somewhat reassured to note that within the Sea Link statutory consultation, concerns about the cumulative impact of multiple infrastructure projects in east Suffolk are being addressed, and that opportunities for the co-ordination of multiple infrastructure projects and the co-location of infrastructure elements are being explored. However, 'Table 2.14.38 Socio-Economics, Recreation and Tourism CEA' states that there is insufficient information to determine any cumulative effects at this stage. Therefore, EDR will continue to monitor and review the progress made in evaluating cumulative effects once the Environmental Statement is published in due course.

- 13.10.4 EDR expressed a concern during the non-statutory consultation about baseline data methodology, recognising a need for caution when relying on purely desk-based research and digital modelling to establish the socio-economic baseline, and ongoing monitoring and assessment of socio-economic impacts.

- 13.10.5 EDR recognises the limitations of certain 'standard' datasets and believes that additional field base assessments including visitor, business, and resident surveys should be conducted to establish baseline information for some of the more qualitative or intangible impacts of the scheme. Especially, the perception of business owners and visitors towards the scheme, the impact on the visitor experience and reputation throughout the project life cycle, and the impact on the movement of residents, and visitors during the construction phase.

13.10.6 This approach could create a more dynamic reporting methodology, allowing real-time understanding of the socio-economic impact of the Suffolk Onshore Scheme. This is congruent with the PEIR, paragraphs 2.11.4.26 and 2.11.4.27.

13.10.7 EDR notes that within the Preliminary Assessment Effects, paragraph 2.11.9.4 that the Suffolk Onshore Scheme might create 105 net additional jobs during the construction period. The significance of energy generation and transmission to east Suffolk means that EDR would welcome the opportunity to discuss the possibility of a 'NGET outreach' programme, like NGET's 'Connect Partnership', providing a series of in-person workshops, seminars, and Q&A sessions for local students.

13.10.8 In terms of the PEIR, the following comments are made:

- a) EDR acknowledges the use of NPS EN-1 (2011) in determining the socio-economic considerations for the PEIR and welcomes inclusion of the additional requirements identified within the published draft NPS EN-1 (2023).
- b) EDR concur with the potential socio-economic impacts identified within Table 2.11.1.
- c) EDR confirms that it was able to engage with NGET through the non-statutory consultation in November 2022, and again through the online thematic meeting in August 2023. Table 2.11.2.
- d) The NPPF requirements relevant to socio-economic requirements are welcome, especially those where potential project impacts could adversely affect economic growth and productivity across local economic centres and key industrial sectors such as tourism. Table 2.11.3.
- e) EDR appreciates the inclusion of, and reference to key economic development strategies (East Suffolk Economic Strategy 2022-202, East Suffolk Visitor Economy Strategy 2022-2027 and East Suffolk Cultural Strategy 2023-2028).
- f) ID 3.10.1 refers to the creation of permanent operational phase employment, training, and apprenticeship opportunities, both directly and indirectly in East Suffolk. EDR accepts that the scale of operational employment is likely to be very limited and that this matter should be scoped out of the assessment.
- g) ID 3.10.2 scopes out an assessment of the generation of GVA in East Suffolk during the operational phase. EDR accepts that during the operational phase, any effect on GVA will be small.
- h) ID 3.10.3 EDR welcomes the introduction of routes connected via the road network as well as recreational routes and public rights of way when assessing impacts on local communities.
- i) EDR welcomes the additional assessment of the impact of the changing influx of the construction workforce on local accommodation facilities and their effect on the local tourism industry. Paragraph 2.11.3.3.

- j) EDR are satisfied with the overarching approach described in paragraph 2.11.41 which 'determine the baseline conditions, sensitivity of the receptors and magnitude of effects and sets out the significance criteria that have been used for the preliminary socio-economics, recreation and tourism assessment'. However, where the assessment aims to adopt an objective and quantifiable approach, EDR recognises that some effects can only be evaluated on a qualitative basis and is supportive of the PEIR definition of effects described in 2.11.4.8.
- k) EDR is supportive of the adopted methodology described in 2.11.4.10 for assessing the significance of project effects on the defined receptors.
- l) The economic additionality assumptions described in Table 2.11.6 and the economic impact criteria described in paragraph 2.11.4.14 including the sensitivity and magnitude criteria in 2.11.4.5 and tabulated in tables 2.11.7 and 2.11.8 are considered appropriate for the assessment of the socio-economic receptors relating to employment and GVA.
- m) Likewise, the magnitude and sensitivity criteria adopted to assess the direct and severance effects on public rights of way and private, community, recreation and tourism assets described in tables 2.11.9 through to 2.11.12 are considered appropriate.
- n) The basis of assigning significance of effects in image 2.11.1 is appropriate.
- o) EDR supports the requirement for built in design flexibility and the need to consider alternative scenarios outlined in paragraph 2.11.5.1, Table 2.11.13 and Table 2.11.14.
- p) The option for co-location with National Grid Ventures proposed Nautilus and LionLink (formerly known as EuroLink) interconnector projects is welcome. Especially where it has the potential to reduce the potential for adverse socio-economic impacts, especially during the construction phase of each project. Paragraph 2.11.5.7 and Table 2.11.15.
- q) The different components of the socio-economics recreation and tourism effects assessment presented in Table 2.11.16, describing the geographic scale at which each component is assessed, and the rationale behind the geographic scales need to be considered.
- r) When considering the 60-minute travel area for employment generation and GVA during the construction phase, the use of CIPD national commute data may not reflect the true geographical area of impact, particularly for those direct, highly specialised, and technical trades required for construction of electricity transmission infrastructure.
- s) When considering the 1km and 500m radii, especially for local communities, business premises and visitor attractions, EDR believes that it is important to recognise the degree of interdependency between visitor destinations, employment, and supply chains throughout east Suffolk. Professional judgement and experience should be used to consider the potential for direct and indirect impacts that fall outside of the proposed geographical areas of impact.

- t) EDR recognises the limitations of certain datasets, especially the time lag between data collection, analysis and publication and believes that additional field base assessments including visitor, business, and resident surveys should be conducted to establish a baseline for some of the more qualitative or intangible impacts of the scheme.
- u) In addition, the appropriate frequency of data sampling should be considered. However, EDR agrees with the benchmarked standard in paragraph 2.11.7.2
- v) Paragraph 2.11.7.30 and Table 2.11.20 identifies 27 business premises within 500m of the Suffolk Onshore Scheme Order Limits. Within the list of premises, it is notable that 12 can be described as closely linked to recreation and tourism and it could be argued that these could be more sensitive to the construction phase of the Suffolk Onshore Scheme than other business premises. The list includes a golf club, holiday lets, campsite, and a café. EDR would like to know more about the methodology planned for assessing the impact of the scheme during the construction phase of the project.
- w) In addition, the visitor attractions listed in 2.11.7.31 could be more sensitive to environmental impacts during the construction phase due to their status as visitor destinations.
- x) The categories of mitigation measures described in 2.11.8.2 and 2.11.8.3; whether embedded measures; control and management measures; and mitigation are as expected and EDR welcome active measures such as 'keeping the community and local businesses informed' providing that they are comprehensive and maintained throughout the construction phase.
- y) EDR notes that in Table 2.11.38, the preliminary assessment considers the preliminary project effects on construction employment within the Economic Study Area, and employment to have a small beneficial effect which is not considered significant.
- z) EDR notes that in Table 2.11.39, the preliminary assessment of socio-economics, recreation, and tourism effects of the project on construction employment within the Economic Study Area, and employment to have a small beneficial effect which is not considered significant.

END