



EuroLink – National Grid Ventures

Non- Statutory Consultation

Suffolk County Council Response

December 2022

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1. Introduction

- 1.1. These comments of Suffolk County Council (SCC) are in response to the non-statutory consultation held by National Grid Ventures (NGV) between 24 October 2022 and 18 December 2022.
- 1.2. The scheme consists of a 1.8GW Multipurpose interconnector (MPI) which will provide a new electricity link between Great Britain and the Netherlands and connect to Dutch offshore wind turbines.
- 1.3. The onshore infrastructure in Suffolk will consist of a Converter Station, onshore DC Cables, onshore AC cables and a transition bay. The onshore AC cables will connect the converter station to the consented, but as yet unbuilt, National Grid ET substation at Friston in East Suffolk, which SCC understands is likely to require additional infrastructure (and probably extension) to accommodate a connection for Eurolink.
- 1.4. The SCC electoral divisions affected include:
 - Felixstowe Coastal.
 - Felixstowe North and Trimley.
 - Wilford.
 - Aldeburgh and Leiston.
 - Blything.
 - Kessingland and Southwold.
 - Lowestoft South.
- 1.5. This representation sets out in the first section SCC's key issues, with the second part (in Appendix A) providing detailed technical comments. Given the extent and nature of the matters of concern to the SCC it was not practical for them to be expressed using the format of NGV's consultation feedback form. SCC has also set out an interim structured approach to the issues posed by this and other proposed developments coming forward 'Interim Siting and Design Principles for Offshore Wind and Interconnectors in Suffolk,' which can be found in Appendix B.

General Comments

SCC Energy Infrastructure Policy

- 1.7. SCC adopted its Energy Infrastructure Policy in February 2021, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for SCC's position on the EuroLink proposals, and states:
- 1.8. "Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."¹
- 1.9. SCC will follow this approach in this Representation, and throughout the subsequent DCO process. SCC does note with some concern the difficulty in accessing online sufficient information about the EuroLink project from the available consultation materials. Very limited information has been provided, and no material is provided to explain the choice of options presented. SCC would expect a much clearer and more accessible approach to be adopted in future consultations.
- 1.10. SCC continues to be willing to work with NGV through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

Need for the project

- 1.11. SCC recognises the importance of MPIs as part of the nationally and internationally required infrastructure, to decarbonise the grid, improve energy supply resilience, and help to meet the challenges of climate change. However, whilst the principle of MPIs is accepted, SCC understands that MPIs (unlike the Sea Link reinforcement proposals currently proposed by National Grid Electricity Transmission (NGET)) have more flexibility as to their onshore landing points, and hence could equally be connected elsewhere on the east coast of the United Kingdom, whilst still providing a connection to the Dutch electricity network and Dutch offshore wind farm(s). Given the specific challenges of connecting in Suffolk, in relation to both the cumulative impacts and the environmental impacts, the first preference is that MPIs should be connected elsewhere in the UK, at less constrained and less harmful sites, and hence alternative locations for MPI connections need to be explored in full.
- 1.12. If NGV continues to make a case to connect in Suffolk, it needs, in future consultations, to provide the evidence that alternative landing sites, outside of the Suffolk Coast and Heaths AONB and the Suffolk Heritage Coast, have been fully assessed, and that there are not less constrained or less harmful sites along the wider East coast that could be suitable for this MPI. SCC notes that NGV

¹ See SCC Energy and Infrastructure Policy: <https://www.suffolk.gov.uk/assets/suffolk.gov.uk/strategic-electricity-networks/SCC-Energy-Policy-230212.pdf>

has received a grid connection agreement from National Grid Electricity System Operator (NGESO) to allow a connection to a sub-station in the Leiston area but it would remain open to NGV to seek an alternative connection point. Indeed, that is the approach that SCC understands that NGV is currently taking with its separate Nautilus MPI project, notwithstanding that it also received an earlier grid connection agreement in the Leiston area.

- 1.13. It should be noted that SCC understands that, unlike MPIs, the Sea Link project must, in order to deliver the necessary network reinforcement, be connected in Suffolk.
- 1.14. During the consultation, and particularly at public consultation events, there was discussion and exploration of the role of energy islands in providing and supporting a coordinated offshore network, which it is assumed could reduce the terrestrial harm of the project. SCC recognises that there is considerable public interest in this issue, which has also been bolstered by the recent publication of the North Sea Wind Power Hub feasibility report in November 2022². Therefore SCC requests that NGV provides information to such options, as to the role, utility, and timeliness, of energy islands to support, or not, greater offshore coordination whilst delivering the necessary targets and required deadlines.
- 1.15. Comments on the specific proposals of Eurolink in the response are notwithstanding SCC's position that the need for Eurolink in this location is not yet proven.

Coordinated approach between Eurolink, Sea Link and Nautilus

- 1.16. SCC's clear preference is for a coordinated, offshore centred approach, delivered at pace, to minimise onshore infrastructure in Suffolk. Therefore, SCC welcomes that this connection is proposed as a Multipurpose interconnector (MPI) with the opportunity to allow for offshore wind projects to connect into this MPI.
- 1.17. SCC is responding to this consultation³ on the basis that both the Nautilus³ Multi-Purpose Interconnector promoted by NGV and NGET's project SeaLink⁴, will be connecting in Suffolk, notwithstanding the promoter's current efforts to secure a connection for Nautilus at the Isle of Grain in Kent (which would be welcomed by SCC as this would be in line with its evolving principles for the siting and design for the connection of offshore wind and interconnector infrastructure in Suffolk), and notwithstanding that the need for Eurolink in this location is not yet proven.
- 1.18. If it is not possible for Nautilus and/or Eurolink to connect in other locations outside Suffolk, which are less harmful and/or have a lesser level of cumulative impacts, SCC considers that co-location of projects (including Sea Link) and coordination of cabling, construction and schemes of mitigation is essential.

² <https://northseawindpowerhub.eu/knowledge/hubs-and-spokes-viable-beyond-theory>

³ <https://www.nationalgrid.com/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus-interconnector>

⁴ <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/sealink>

Therefore, cable landing points and potential converter station sites, that do not support such coordination are unacceptable to SCC.

- 1.19. SCC considers that three of the four possible converter station sites appear capable of delivering a consolidated and coordinated approach with Sea Link and Nautilus, although one of those is not currently considered by Sea Link.
- 1.20. Each of the converter stations for these three projects are proposed to cover five to six hectares in area and 25 to 30 metres in height. Consolidation of these projects into one site would significantly reduce the spatial extent of adverse impact, although SCC recognise that this would not avoid a significant magnitude of change in the hosting location, or substantial residual visual impact in the locality.
- 1.21. Therefore, it is the view of the SCC that a consolidated site should, as far as possible minimise adverse impact in the long term. To achieve this, short-term issues around ease of construction should be set aside and focus should be on achieving the best available operational outcome.
- 1.22. This response is guided by the siting and design principles for the connection of offshore wind and interconnector infrastructure in Suffolk (see Appendix B).

Need for an exemplary approach to minimising long-term impact

- 1.23. Given the sensitivities and cumulative pressure on the area, SCC expects NGV to take an exemplary approach to site selection, design and embedded and secondary mitigation. NGV should prioritise the minimisation of the permanent, operational harms, arising from this development alone and together with those of Sea Link and Nautilus. The objective should be to achieve the least possible long-term negative impact on communities and the environment. This prioritisation of minimising permanent harm is reflected in the interim design and siting principles, set out in the detailed response. It is recognised that such an approach may potentially affect the extent of temporary harm during construction. However, given the extent and magnitude of the proposed projects, priority should be given to minimising permanent harm.

Overview of SCC's position on the specific proposals

- 1.24. As to the proposed options, the key priority should be to achieve a coordinated approach and minimise impacts. The approach taken in option selection and in the development of the preferred option should be to prioritise avoidance before mitigation and to prioritise mitigation before compensation, in accordance with the mitigation hierarchy. This means that:
- 1.25. Proposed Converter station site 1 is unacceptable due to its proximity to the AONB.
- 1.26. Converter station site 3 (Saxmundham), which is also included in the Sea Link consultation as a possible site, has significant constraints, and further assessment needs to be undertaken as to practicalities and impacts of this site.

- 1.27. Of the other two sites, SCC considers that only the Theberton / Leiston Airfield (site 4) could be a potential for a shared converter station site with Sea Link, although it is noted that in its current consultation, Sea Link has either not considered or has discarded without explanation this site as an option.
- 1.28. The proposed landfall sites at Dunwich (H), Walberswick (G) and Reydon (F), and associated cable runs, are unacceptable due to their environmental impacts and extensive length of cable route through sensitive landscapes, and also as they would not allow for coordination with Sea Link as these are not considered viable options by Sea Link.
- 1.29. The proposed landfall site between Aldeburgh and Thorpeness (E), and cable routing to a converter station site, has substantial ecological and other challenges and constraints which need to be fully assessed.
- 1.30. Whichever option is chosen, SCC expects a comprehensive assessment of impacts, including full consideration of cumulative impacts with other major projects in the area, and a comprehensive package of mitigation measures where avoidance of impacts is not achievable. Where there are residual impacts that cannot be avoided or mitigated (or further mitigated), SCC expects to see compensatory, or offsetting measures put in place for the benefit of the local receiving environment and/or local communities. It would not be acceptable for the harm arising from residual impacts to be imposed on the local environment or community and left to be weighed against the benefits delivered without first following all the steps of the mitigation hierarchy.

Key Issues and Summary of Feedback on Options

Community benefits and project legacy

- 1.31. Secondary mitigation should be in addition to any community benefits from the development, including any arising from emerging requirements in the anticipated consultation on Community Benefits foreshadowed in the British Energy Security Strategy.
- 1.32. SCC encourages the project promoter to consider such community benefit options and would be happy to discuss how community benefit suitable for the locality could be incorporated.
- 1.33. SCC also encourages project promoters to consider legacy opportunities of all elements of their development.

Archaeology

- 1.34. The archaeological implications of multiple schemes in this landscape are cumulatively increasing for every project and SCC notes that possibilities for co-location of elements of this scheme with the Sea Link project are being explored which would increase impacts. Although SCC would generally see a benefit in this coordination, this does have the potential to reduce the flexibility to be able to avoid significant archaeology which has yet to be defined.

- 1.35. To inform the siting and routing of the proposed scheme, a thorough desk top assessment and field evaluation is needed to allow the archaeological potential of the different parts of the study area, and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

Skills and training

- 1.36. The construction period is predicted to occur during the middle of construction period of the recently consented Sizewell C Nuclear Power Station. It is anticipated that there would be significant cumulative pressure on the available workforce. This could reduce the opportunities to securing any skills and employment legacy from the construction workforces as the projects are now occurring in parallel.

Flood Risk

- 1.37. All sources of flood risk should be considered as part of the site selection process, with the Sequential & Exception Tests being undertaken for sites where any source of flood risk is identified. It has not been demonstrated that all sources of flood risk, including allowances for the current and future impacts of climate change, have been considered as part of the site selection and cable corridor selection process.
- 1.38. The Friston sub-station location is particularly sensitive in terms of surface water flood risk to downstream receptors and therefore it must be adequately assessed both during construction and operation.

Tourism mitigation

- 1.39. SCC anticipates that the proposed development, alongside other proposed and consented schemes within locations close to Suffolk Coast and Heaths AONB and other rural areas important to the Suffolk, could have significant impacts upon visitor perception and visitor numbers both during construction and during operation.

Traffic and Transport

- 1.40. NGV will be aware that a number of recent NSIPs have been submitted and given consent in the local area most notably, Sizewell C, East Anglia One North and Two and East Anglia Two, and therefore, there is a large amount of information and data available from these projects which should be considered as part of the EuroLink proposals.
- 1.41. As set out in the consultation documentation, NGV are also aware of the Sea Link and Nautilus proposals in the area and have considered options for a coordinated approach to the sites.
- 1.42. SCC considers that NGV should continue discussions with all of the above developers to minimise highways impacts on the local communities, such as requirements for materials and associated HGV movements, workforce numbers and traffic management on the highway network.

1.43. As no information has yet been provided regarding vehicle or construction workforce forecasts or how traffic movements may be reduced e.g. through the use of haul roads, SCC can only provide limited comments at this stage. SCC expects these impacts to be fully assessed and mitigated, especially as regards to any potential construction traffic impacts on SCC's rural road network and the limited options for suitable HGV and AIL routes once the Eurolink cable route alignment has been chosen. Decommissioning/removal also needs careful consideration.

Cumulative impacts

1.44. Given the number of infrastructure and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the proposed development in conjunction with those other projects is particularly important.

Proposed Connection to Friston Substation

1.45. The Eurolink scheme is proposed to connect to the approved (through the East Anglia One North and East Anglia Two DCOs) but not yet built National Grid substation at Friston. SCC understands that additional infrastructure is likely to be required, which will probably require the expansion of what is already a constrained site. It is also noted that these development consents were subject to an unsuccessful Judicial Review (judgment given on 13 December 2022) but it is not yet known whether there will be any appeal.

2. Siting Options

SCC Evolving Siting and Design Principles for Onshore Infrastructure

- 2.1. Appendix B sets out SCC's evolving siting and design principles for onshore infrastructure.
- 2.2. SCC's first preference for siting converter sites should be appropriate brownfield/previously developed sites.
- 2.3. In the absence of appropriate brownfield/previously developed sites, consideration should be given to new sites adjacent to existing built development, specifically industrial/commercial.
- 2.4. Sites adjacent to, or within the setting of an Area of Outstanding Natural Beauty (AONB) or National Park, should not be considered at all unless, exceptionally, recognising the need to deliver strategic Net Zero energy infrastructure, there are no alternative sites, or the site is brownfield/previously developed and there is capability to effectively mitigate the development to the extent that it has no minimal impacts on the designation.
- 2.5. It is recognised that other sites which fall within AONB, (or National Park where applicable) may need to be considered, but only if it can be conclusively proven that there are no alternative viable sites.

- 2.6. The proposed Landfall sites and cable routes are highly constrained and in the absence of detailed proposals and mitigation SCC does not wish to support any of them.

Potential Landfall Sites

- 2.7. All proposed landfall sites and cable routes are highly constrained and extremely challenging in terms of their environmental impact.

Landfall sites F (Southwold/Reydon), G (Walberswick), and H (Dunwich)

- 2.8. These landfall sites are located within the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty, and the resulting cable route would impact on the Minsmere Special Protection Area, and Ramsar site.
- 2.9. SCC consider these sites unacceptable and would not support landfall at these locations due to the distance from the Friston substation and the substantial length of onshore DC cable this would require.
- 2.10. These landfall locations would also not be able to achieve coordination with other schemes in the area.
- 2.11. All of these sites are close to residential properties and are constrained in regards to access.

Landfall E (Aldeburgh)

- 2.12. This landfall site is located within the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is close to the Sandlings Special Protection Area and the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential. In terms of tourism, it is located within in a tourism hotspot.
- 2.13. The site is constrained due to access due to the surrounding roads being unsuitable for construction traffic and would also require a new access along the B1122.
- 2.14. Hence it is a challenging site, and potential impacts need to be fully assessed.

Potential Converter Station Sites

- 2.15. All of the proposed sites are constrained to a greater or lesser extent.

Converter Station Site 1 – Aldeburgh

- 2.16. Converter Station Site 1 is located on land to the north of Hazlewood Hall, Aldeburgh.
- 2.17. Having reviewed the information provided by the applicant and considered the options in this consultation, SCC considers the site unacceptable due to its prominent location adjacent to and overlooking the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and other protected sites.
- 2.18. The site is highly constrained as it is set in gently rolling countryside within the setting of, and on two sides adjacent to the AONB, on the outskirts of Aldeburgh, to the north of Hazlewood Hall.

- 2.19. It is wholly within the Estate Sandlands landscape of the Suffolk Landscape Character Assessment (LCA). It is typical of that landscape, consisting of regular late enclosure fields, plantation woodlands and coverts, characteristic of that landscape type.
- 2.20. The site appears to be elevated by at least ten metres relative to the A1094, which runs along the northern side of the boundary of the Suffolk Coast and Heaths AONB which would further increase the visual impact of the buildings of the scale proposed.
- 2.21. The site is within 2 km of the Alde-Ore Estuary Site of Special Scientific Interest (SSSI) and RAMSAR sites, the Sandlings Special Protection Area (SPA), North Warren RSPB Reserve, Snape Warren SSSI, the Alde-Ore and Butley Estuaries SAC to the south and further smaller SSSI. It is also adjacent to Great Wood, which is an ancient woodland.
- 2.22. Given the location and scale of the project alone, and in combination with other projects, it appears highly unlikely that NGET would be able to eliminate the significant adverse impacts on the AONB, given the elevation of the site relative to the AONB to the south and east.
- 2.23. Additionally, the impacts of a succession of construction projects at this site, and their operation, which would be required to achieve coordination with Nautilus and Sea Link would be unacceptable.

Converter station Site 3 - Saxmundham

- 2.24. Converter Station Site 3 is located on land to the north and east of Bloomfield's Covert on the eastern boundary of the small town of Saxmundham.
- 2.25. The site is open arable land, from which historical landscape features are absent. Before agricultural improvement works were undertaken after 1945, the site had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, ponds, and a small plantation typical of the Ancient Estate Clavlands landscape type. Currently, the landscape is generally open and therefore a converter station would be prominent from the B119.
- 2.26. There are a number of listed buildings in the vicinity of the site, including Wood Farmhouse and Hill Farmhouse, both of which are Grade II Listed. The development would potentially cause a detrimental impact to their setting.
- 2.27. The site is constrained with regards to access due to the road network around the area with the B1119 being generally unsuitable for construction and subsequent operational traffic. A temporary haul road would potentially be required for construction traffic to access the site.

Converter Station Site 4 – Theberton / Leiston Airfield

- 2.28. The potential HVDC cable routes to this site are highly constrained and there is no obvious highways access.
- 2.29. The westernmost part of the search area appears to be outside the boundary of the former airfield and therefore retains some limited historic hedge lines. As a result, any development would need to be accommodated within the existing

field pattern. It should also be noted that despite the total loss of historic landscape features on the former airfield itself, there are some constraining features, including plantation woodland.

- 2.30. It is noted that the Sea Link project has either not considered or discarded this site; however, SCC is encouraging NGET to re-consider this site as it would be capable of co-location. The use of a brownfield location is in principle welcomed by SCC.

Converter Station Site 5 - Knodishall

- 2.31. This site is highly constrained and is considered unacceptable for a convertor station. The development of it would potentially have a detrimental impact upon the setting of listed buildings in Knodishall including the Parish Church which is listed as Grade II*. The landscape includes attractive woodland and belts of trees some of which would potentially be lost. Knodishall Footpaths 14 and 16 cross the site and would potentially require diversion.
- 2.32. In terms of archaeology there is a Roman Villa within the boundary with the potential to be a site of national significance, and so requires early assessment.
- 2.33. This area retains a simplified pattern of historic field boundaries with later plantations and secondary woodlands, it is part of the [Ancient Estate Claylands](#) landscape type. Any development in this area would need to be capable of being accommodated within the existing pattern of enclosures and woodlands. Furthermore, the proximity of Knodishall village would be likely to give rise to adverse impacts that it may not be possible to avoid or appropriately mitigate. Finally, in this landscape extensive new planting has the potential to have an adverse impact on landscape character.

Appendix A – detailed technical comments

3. Introduction

3.1. SCC has gathered technical comments from internal departments in response to the Eurolink Non-Statutory consultation.

3.2. The full list of technical comments is as follows:

- Archaeology
- Ecology
- Lead Local Flood Authority
- Highways
- Landscape and Visual
- Public Rights of Way
- Corporate Property
- Socioeconomic

4. Archaeology

- 4.1. The archaeological implications of multiple schemes in this landscape are cumulatively heightening for every project and SCC notes that possibilities for co-location of elements of this scheme with the Sea Link project are being explored which would increase impacts. Although SCC would generally see a benefit in this, this does have the potential to reduce the flexibility to be able to avoid significant archaeology which has yet to be defined.
- 4.2. The results from other projects are also showing that there is an enormous amount of important archaeology surviving in this landscape, much of which SCC previously knew nothing about (and some of the proposed areas for this scheme fall within busy geophysics areas which EA1N/EA2 had avoided, but adjacent to areas where the trenches identified extensive archaeology or close to areas where work as part of projects such as Sizewell C have defined significant remains). As such, the need for early, full assessment (desk-based surveys, geophysics, earthwork survey AND trial trenching) is becoming increasingly more important for every scheme (to inform the finalisation of the scheme routing/design) and has the potential to become a point of objection if not undertaken by the start of the examination.
- 4.3. The opportunity for early coordination of both Eurolink and Sea Link projects in terms of archaeological assessment should also be explored as there would appear to be potential for a joined-up approach e.g. geophysical survey of a wider area which would encompass both schemes to allow early considerations of archaeological impacts as scheme design is finalised for both projects (and to make sure that both schemes could be accommodated within an area with enough flexibility to protect any archaeological remains of high significance which are defined e.g. should preservation in situ be appropriate).
- 4.4. The archaeological implications of multiple schemes in this landscape are cumulatively heightening for every project and SCC notes that possibilities for co-location of elements of this scheme with the Sea Link project are being explored which would increase impacts. Although SCC would generally see a benefit in this, this does have the potential to reduce the flexibility to be able to avoid significant archaeology which has yet to be defined. The results from other projects are also showing that there is an enormous amount of important archaeology surviving in this landscape, much of which SCC previously knew nothing about (and some of the proposed areas for this scheme fall within busy geophysics areas which EA1N/EA2 had avoided, but adjacent to areas where the trenches identified extensive archaeology or close to areas where work as part of projects such as Sizewell C have defined significant remains). As such, the need for early, full assessment (desk-based surveys, geophysics, earthwork survey AND trial trenching) is becoming increasingly more important for every scheme (to inform the finalisation of the scheme routing/design) and has the potential to become a point of objection if not undertaken by the start of the examination.

- 4.5. The opportunity for early coordination of both Eurolink and Sea Link projects in terms of archaeological assessment should also be explored as there would appear to be potential for a joined-up approach e.g. geophysical survey of a wider area which would encompass both schemes to allow early considerations of archaeological impacts as scheme design is finalised for both projects (and to make sure that both schemes could be accommodated within an area with enough flexibility to protect any archaeological remains of high significance which are defined e.g. should preservation *in situ* be appropriate).

General comments

- 4.6. The longer the cable routes, the greater the potential archaeological impacts and the scale and scope of investigation and mitigation. Where cables pass through watercourses there is potential for well-preserved stratified sites in and on the valley sides as well as palaeo-environmental remains.
- 4.7. It is essential that further refinement of the siting/routing methodology should include a search of the HER/Desk-Based Assessment and should consider the impact of the proposed development on designated and non-designated heritage assets and sites of archaeological potential, drawing on landscape and topography. Attention should also be given to assessing the relative importance of any World War 2 remains in relation to the defensive coast.
- 4.8. Given the interaction with the EA1N/EA2 scheme and also potentially Sizewell, depending upon the design options which are selected, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme. The EA1N/EA2 geophysical survey data and some of the Sizewell geophysics and trial trenching results are publicly available as part of the relevant examinations– SCCAS are also happy to advise on the findings where reports are not yet available. These surveys illustrate how much information is added to HER data through systematic survey, realising archaeological potential, as a significant number of archaeological sites have been defined which were not previously recorded on the County HER, or associated with finds scatter or cropmark evidence.
- 4.9. There should not be an assumption that data within the Historic Environment Record (HER) is of local significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets. Sites of archaeological potential which have not yet been subject to systematic assessment (and are therefore currently of unknown significance) should also be considered.
- 4.10. The current onshore study areas have in most parts not been subject to systematic archaeological investigation and, therefore, the character, extent, and significance of surviving above and below ground heritage assets across this area has yet to be defined. There is high potential for additional, and to date unknown, significant heritage assets to survive across much of this area. Some of these may be of national significance and worthy of *preservation in situ*. As such without further assessment to fully characterise the heritage resource, the

impacts of the development upon above and below ground heritage assets cannot be fully understood.

- 4.11. All onshore elements of the scheme (for example, landfall sites, converter station sites, grid connection substation site, underground cable corridors, jointing bays, link boxes, Horizontal Directional Drilling (HDD) pits and any other impacts associated with the scheme for example, haul roads, compounds, planting and ecological mitigation, offsite transport improvements etc.) have the potential to damage or destroy any surviving archaeological remains so all elements of the scheme should be scoped in for archaeological assessment. As well as impacts during construction work, activity during site operation as well as decommissioning work (including any associated site compounds) will need to be scoped in for a consideration of archaeological impacts given the potential for remains which will need to be preserved in situ and will therefore need to be protected from disturbance throughout all phases.

Further assessment required

- 4.12. To inform the siting and routing of the proposed scheme a thorough desk top assessment and field evaluation is needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.
- 4.13. A desk-based assessment would be appropriate in the first instance. This should include a historic map regression, a study of aerial photography (including historical imagery), an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.
- 4.14. A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.
- 4.15. Landscape should be considered for assessment as an aspect of the historic environment. There will be interrelationships in assessment between archaeological and the built environment. The lack of a holistic approach to assessing the impact on landscape has given rise to omissions in other recent DCO applications.
- 4.16. Earthwork survey and building assessment should be undertaken of upstanding remains, particularly Second World War remains, to properly assess their significance in the context of the defensive coast.
- 4.17. All areas which will be impacted upon by the different elements of the scheme should be subject to archaeological field assessment at this stage in considering the location, layout and design of the landfall, converter station site, grid

connection substation site, cable route, jointing bays, link boxes and HDD pits to allow for *preservation in situ* where appropriate of any sites of importance that might be defined (and which are currently unknown).

- 4.18. Geophysical survey (a combination of magnetometry and resistivity as appropriate), also accompanied by fieldwalking and a metal detecting survey, should form a first phase of field evaluation.
- 4.19. The results of these assessments should be used to then inform a programme of trial trenched evaluation, combined with palaeo-environmental assessment in river valley areas.
- 4.20. SCC advises that all sites which will be impacted on by any element of the onshore works should be subject a full suite of archaeological assessment (desk-based, geophysical, fieldwalking/metal detecting and trial trenched evaluation) prior to/at EIA stage, with assessment used to inform final site selection/routing. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and to contribute to risk management. Upfront work will ensure all options can be properly considered and the scope of mitigation defined (including giving proper thought to *preservation in situ* and alternative solutions), avoiding unexpected costs and delays post-consent. Evaluation at this stage will test the suitability of sites for development, given the reduced flexibility for mitigation through design once a location for landfall, converter station site, grid connection substation site, cable route, jointing bays, link boxes and HDD pits have been selected and as a result of restrictions caused by other schemes in this area. Early work will also enable archaeological work to be designed alongside other elements of the scheme, e.g. working in archaeological work with ecological work, or informing spoil and dust management.
- 4.21. The combined results of the above assessments should then be used to develop a mitigation strategy. Some areas (yet unidentified) may require localised *preservation in situ* where appropriate. For surviving below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the resultant mitigation included should include proposals to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, will be based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work must also be included.
- 4.22. All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS. All stages of the work will be monitored by SCCAS on behalf of the relevant discharging authority in accordance with the DCO to ensure the written schemes are satisfactorily fulfilled.

- 4.23. Any ongoing works during site operation must not take place within any areas where archaeological remains have been *preserved in situ* as part of archaeological mitigation strategies. If any areas of archaeology are to be *preserved in situ*, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development and provision must be made for a detailed management plan.
- 4.24. As has been shown by other Nationally Significant Infrastructure Projects in the region time will be a critical factor. Archaeological and heritage assessments and mitigation phases should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken (e.g. taking into account agricultural cycles and commencing landowner negotiations at the earliest opportunity) and also fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule. SCC would advise that an archaeological consultant is bought on board early on.
- 4.25. Several large projects in the area at a given time (which is likely given the timeframes of other schemes) may put pressure on available archaeological work forces which is something to be aware of.
- 4.26. There is high archaeological potential for all current areas being considered, the majority of which have not yet been subject to systematic archaeological investigation, therefore full assessment is required at the earliest opportunity.
- 4.27. The “Environmental Constraints Overview: Heritage map” which has been provided omits all of the known undesignated Heritage Assets within the scheme area which do need to be considered going forward and the potential for extensive and as yet unknown archaeological is not adequately recognised within any of the current submitted documentation and therefore it is important to highlight at this early stage that without full assessment, it will not be possible to fully understand the archaeological impacts of proposals and to enable informed decisions to be made.

Friston substation

- 4.28. This is situated within area which has been subject to geophysical survey and trial trenching as part of the EA1N/EA2 project and this assessment work has defined multi-period archaeological remains requiring mitigation

Converter station site 1

- 4.29. This site is within a topographically favourable location for archaeological activity from all periods, situated on light, sandy soils and close to watercourses. The site, however, has never been subject to any systematic archaeological investigation and so the full archaeological potential is currently unknown.
- 4.30. The site is adjacent to the recorded site Hazlewood Aerodrome (FRS 017) a WWI military training site and also an extant area of ancient woodland (Great Wood) which should be retained and disturbance to any associated earthwork features should be avoided. An earthwork assessment for this area would be

appropriate to establish whether any military features still survive and as wood banks and other earthworks are recorded.

- 4.31. Multi period finds scatter are recorded within the vicinity and trial trenching as part of the section of the EA1N/EA2 scheme to the north has recorded extensive, multi-period archaeological remains requiring mitigation, with geophysical survey indicating that further remains continue within the wider area.

Converter station site 3

- 4.32. This site has not previously subject to any archaeological assessment, so the archaeological potential is unknown at present. The site of former ancient woodland is recorded within this area (SXM 009).

Converter station site 4

- 4.33. This site has not previously subject to any archaeological assessment, so the archaeological potential is unknown at present. The site contains part of a Second World War Airfield (THB 015) and there is potential for above and below ground remains associated with this site. A walkover survey would be appropriate in this area. Within this area a cropmark enclosure is also recorded (THB 018) which would require further assessment. The north-east part of the site is adjacent to an area where archaeological investigations as part of the Sizewell Link Road assessment works has defined expensive medieval remains as well as prehistoric features (THB 046).

Converter station site 5

- 4.34. This site is close to the Hundred River and so has high potential for multi-period archaeological remains (including waterlogged and paleoenvironmental deposits), however, it has not previously been subject to any archaeological assessment, although geophysical survey and trial trenching work as part of the EA1N/EA2 scheme to the south and west has defined a number of archaeological sites. Within the area, a scatter of prehistoric finds has also been recorded in this area (KND 013) as well as a Roman villa site identified through fieldwalking ([KND 004](#)) which has not been investigated or defined. This has the potential to be a site of national significance and so this site option is not favoured by SCCAS. Full, early assessment would be necessary to inform siting decisions and considerations of significance/preservation in situ if this becomes a preferred site option.

Landfall site E

- 4.35. This is not a landfall location favoured by SCCAS as this site lies within 'The Mear' recorded from the 16th century (ADB 160), historically a turbary/natural harbour (Thorpe Haven, or Almouth). The potential for buried and organic (including wooden) remains is high in this area. Wetland archaeology is relevant here, albeit impacted by peat cutting and later WW2 anti-aircraft defences. Early assessment would therefore be necessary.

Landfall site F

4.36. This site is located within a marshland area which has potential for waterlogged and organic remains, including wooden structures and also boats and quay remains along Buss Creek (as recorded during previous works along the Creek-SWD 006) therefore early assessment is necessary. This location has potential for multi-period remains and Roman and medieval finds and features have been recorded in the immediate vicinity (EBV 056, 064). The sites of various military features are also recorded within this site (EBV 013, 026, 032, 039 and 040).

Landfall site G

4.37. This site is located within a marshland area which has potential for waterlogged and organic remains, including wooden structures. This location has potential for multi-period remains and prehistoric and medieval finds and features have been recorded in the immediate vicinity (WLB 005, 006, 012, 108, 130). The sites of various military features are also recorded within and around this site (WLB 041, 042, 166, 167).

Landfall site H

4.38. This site has not previously subject to any archaeological assessment but has potential for archaeological remains from all periods, in particular of medieval date given findspots in the immediate vicinity (DUN 002, 010). A number of Second World War sites are also recorded in the area (DUN 061, 065).

Cable corridor

4.39. The cable corridor options are situated within a favourable location for archaeological activity from all periods, on light, sandy soils and close to watercourses. The majority of all the cable corridor option areas have, however, never been subject to any systematic archaeological investigation and so the full archaeological potential is currently unknown. The entire cable route for whichever option is selected therefore requires full, early archaeological assessment.

Section from Aldeburgh to the B1069:

4.40. Within the area around the proposed landfall site there is high potential for buried and organic (including wooden) remains in this area. Early assessment would therefore be necessary. The remains of a smock mill also survive within this area (ADB 017) and best practice would be to preserve this site in situ. Various WWII features are recorded in this area (ADB 063, 064, 066, 067, 068 103) and therefore above ground surveys, alongside below ground assessment, would also be appropriate.

4.41. The section of the cable corridor between landfall and the B1122 to the north of Aldeburgh would have no option but to pass through one of a number of very sensitive archaeological sites, including Gorse Hill, where multiple Roman cremations were recorded, alongside a large number of pottery and other finds, also associated with prehistoric and medieval finds (ADB 004, 008, 009, 010, 014) and cropmark features (ABD 202, 203). To the south of Gorse Hill, the site

of a medieval market is recorded (ADB 239), situated within an area where extensive cropmarks (ADB 006) and a large number of multi-period finds have been recorded (ADB 006, 172). Full, early assessment is advised to inform siting decisions and considerations of significance/preservation in situ.

- 4.42. Across the North and South warren area, multi-period finds scatters, cropmarks and military sites are recorded (ADB 015, 034, 037, 104 163, 201, 223, 263) with the potential for well-preserved remains to survive in these areas which are not under intensive agriculture. Above and below ground assessment is therefore appropriate at the earliest opportunity.
- 4.43. On South Warren a findspot of a Bronze Age cremation is recorded ADB 011 and near Grange Farm the cropmark of a possible round barrow has been identified (FRS 013). Given the potential for further human remains, archaeological assessment of these areas to inform considerations of significance is essential.
- 4.44. The route currently contains the site of the ruined Hazlewood Church (ADB 005). Given the significance of this site SCCAS would advise the need for the immediate area of the church to be removed from the scheme entirely. Associated with the church site area a large number of multi-period finds (ADB 164, 223, 261). As such there is potential for associated remains to survive within the surrounding area and so early assessment is critical. To the east of Chapel Farm, a cropmark enclosure is recorded (FRS 014).
- 4.45. Between the B1122 and Converter Station site 1 the route contains the site of the former Hazlewood Aerodrome (FRS 017) a WWI military training site and also a WWII Anti-aircraft battery at 8 Acre Covert. An extant area of ancient woodland (Great Wood) is also present which should be retained and disturbance to any associated earthwork features should be avoided. An earthwork assessment for these areas would be appropriate to establish whether any above ground military features still survive and as wood banks and other earthworks are recorded.
- 4.46. To the south of Converter station site 1, no archaeological assessment has previously taken place, although multi-period finds scatters are recorded. To the north, trial trenching as part of the section of the EA1N/EA2 scheme which falls within the current corridor extent has recorded extensive, multi-period archaeological remains requiring mitigation, with geophysical survey and multi-period find scatters indicating that further remains continue within the wider area, with a number of features of particular interest already defined beyond the EA1N/EA2 corridor, but within the area of consideration for this scheme. Early assessment is needed for these features. Much of this route has been designed to avoid more extensive and complex anomalies shown on geophysical survey but as the proposed cable route would pass through these features, they need testing through trial trenching to inform significance/preservation, with the completion of geophysical survey to fill in any gaps.

Section from the B1069 to Saxmundham Road:

- 4.47. Friston Hall and Park site ([FRS 048](#)), a property of Snape Priory briefly owned by Cardinal Wolsey, is a site of high significance. Should this area continue to be included in proposals, it requires detailed DBA to inform siting decisions and significance/preservation in situ. Also needs completion of the geophysical survey undertaken as part of the EA1N/EA2 scheme, which identified a large number of anomalies. Archaeological investigations of an adjacent reservoir have recorded multi-period archaeology (FRS 056). The landscape context of former park should also be assessed. The site of mill mound is also located within this area on the northern edge of the park (SNF 011).
- 4.48. To the north of Friston Park at Sternfield, the route includes a possible moated site, associated with human skeletal remains (SNF 012, SNF 015) – further early investigation should be undertaken to establish what this is if the site is brought forward as an option as this could be funerary enclosure, currently of unknown date.
- 4.49. Friston Green (087) has high potential for associated medieval green edge activity. Within the Green, a mill site (FRS 005) and a number of pillboxes (FRS 060, 062 and 063) are recorded.
- 4.50. In the Friston substation area, the majority has been subject to geophysical survey and trial trenching as part of the EA1N/EA2 project and this assessment work has defined multi-period archaeological remains requiring mitigation. Further assessment work is necessary for any areas not previously included within the work undertaken as part of the EA1N/EA2 scheme.
- 4.51. To the north of Friston church, KND 009 a ruined chapel site is marked on early maps at this location and there is potential for structural and human remains. Geophysical survey as part of the EA1N/EA2 scheme recorded anomalies of archaeological interest. A potential for preservation in situ of significant archaeological remains can already be identified for this option. Given the potential significance of this site SCCAS would advise its removal from the scheme entirely otherwise full up-front evaluation would be required for this area and preservation in situ is likely to be a concern in this area. The settings impact upon Friston Church also need to be properly considered
- 4.52. Between Snape Road and School Road, trial trenching as part of the section of the EA1N/EA2 scheme which falls within the proposed cable route for the current scheme has recorded extensive, multi-period archaeological remains requiring mitigation, with geophysical survey and multi-period find scatters indicating that further remains continue within the wider area, with a number of features of particular interest already defined with the preferred cable corridor. Early assessment is needed for these features. Much of this route has been designed to avoid more extensive and complex anomalies shown on geophysical survey but as the proposed cable route would pass through these features, they need testing through trial trenching to inform significance/preservation, with the completion of geophysical survey to fill in any gaps.

- 4.53. The route in this area passes through the site of a windmill (KND 017) which has been clearly located within the EA1N/EA2 geophysical survey and the sections of the corridor close located close to the Hundred river have potential for waterlogged or paleoenvironmental remains.
- 4.54. Grove Wood is an area of ancient woodland and should be retained and as it is also associated with earthwork features and so would need to be subject to an earthwork assessment.
- 4.55. This section of the route includes part of Friston Moor and there is a potential for medieval green edge activity surrounding this. A medieval moated site (KND 011) situated adjacent to the moor falls within the cable corridor, but SCCAS would advise that this should be excluded from any planned works. Also bordering Friston moor and within the cable corridors is the site of a demolished farmstead (KND 015) and a medieval enclosure (KND 014).
- 4.56. Between the substation site and Saxmundham road, the site of a former brickwork (KND 016) and cropmark enclosure (SNF 013) and decoy pond (SNF 002) are also recorded, along with multi-period find scatters.

Section from Saxmundham Road to Middleton:

- 4.57. To the north of Saxmundham Road, Knodishall Green (KND 006) is a recorded area of a deserted medieval village and includes a ruined church site (KND 001). Given the significance of this site SCCAS would advise the need for the immediate area of the church to be removed from the scheme entirely and full early assessment, including an earthwork survey, would be necessary for the area around Knodishall Green.
- 4.58. At Theberton, the route passes through the area of a Second World War Airfield (THB 015) and there is potential for above and below ground remains associated with this site, including structures. A walkover survey would be appropriate in this area. Within this area a series of cropmark sites are also recorded (THB 018, 023 and 024) which would require further assessment.
- 4.59. The corridor route also passes through the former extent of Theberton Hall Park (THB 014). The landscape context of the former park should be assessed, and a desk based, and walkover survey would be appropriate to identifying surviving parkland features, earthworks, and structures.
- 4.60. A large section of the Sizewell Link Road route passes through this area and archaeological investigations along the road route have defined multi-period archaeological remains, including significant Roman and medieval sites, all of which were previously unknown. Further multi-period remains should therefore be expected to survive in this area.
- 4.61. To the south of Mill Street a ring ditch cropmark (MDD 044) is recorded as well as the site of a former mill (MDD 002)

Section from Middleton to Dunwich:

- 4.62. Sections of the corridor close located close to the Minsmere river have potential for waterlogged or paleoenvironmental remains. Reckford Bridge is marked on

historic maps and so there is potential for the remains of early bridge structures to survive. A Second World War pillbox also stands on the southern edge of the river (MDD 017). On the north side of the river a deserted medieval village is recorded at Fenstreet (WLN 053) and former windmill is also believed to have been situated in the area (LCS 272). Full early assessment, including an earthwork survey, would therefore be necessary for this area.

- 4.63. On Westleton common two Windmill sites are recorded; Reach's Mill (WLN 013) part of which is still extant and the site of Rouse's Mill (WLN 014). Further earthwork features are also recorded on the common (WLN 023) and there is potential for medieval activity surrounding the common and well preserved below ground remains given this area is not under intensive agriculture. As such both above and below ground assessment would be necessary in this area.
- 4.64. Between Mill Road and Minsmere Road a large number of cropmark and earthwork sites are recorded (WLN 059, 093-097, 099, 100) as well as various military sites (WLN 036, 043, 046, 060, 073, 091) and there is also a high potential for well-preserved below ground remains from all periods within areas not under intensive agriculture. As such desk-based surveys, site walkover and earthwork surveys and below ground assessment work would be key for this section of the route.
- 4.65. Around the landfall site, further WWII (DUN 061 and 065) and earthwork sites (DUN 015 and 020) are recorded and again there is high potential for well-preserved below ground remains to survive and so a full suite of assessment work would be necessary. Grey Friars Wood is an area of ancient woodland and would be expected to be retained and would again require an earthwork survey.

Section from Middleton to Walberswick:

- 4.66. Sections of the corridor close located close to the Minsmere river have potential for waterlogged or paleoenvironmental remains and multi-period find scatters are recorded in this area, indicative of archaeology from various periods situated either side of the river.
- 4.67. To the north of Westleton, a deserted medieval village is recorded at Wood Street (WLN 054) and a decoy pond (WLN 012), and two Brick Kiln sites (WLN 110 and 111) are also located in this area. WLN 111 has surviving above ground remains and so a walkover survey would be necessary.
- 4.68. On either side of Dunwich River, there is again potential for waterlogged or paleoenvironmental remains and archaeological remains from all periods. Cropmark sites are recorded on either site (WLN 024, BLB 019 and 020).
- 4.69. Hinton Green (BLB 175) is recorded on early maps and there is potential for associated medieval green edge settlement activity. The site of a WWII radar station is also located to the west (BLB 088).
- 4.70. Hinton Long Spring, Big Wood and Common Wood are all areas of ancient woodland (BLB 031, TNG 024 and 036) and should be retained, but as they also associated with earthwork features (including a medieval moated site in Big Wood- TNG 037) would also need to be subject to an earthwork assessment.

- 4.71. To the north of Hinton Hall, a finds scatter including a large number of Roman finds is recorded, with other multi-period finds recorded in the vicinity (TNG 008), including a Bronze Age hoard identified near Hinton Lodge (BLB 115). To the north of Big Wood and near Hinton Lodge a number of cropmark sites are also recorded (TNG 004 and 007, BLB 007, 010 030, 065, 105), indicative of probable multi-period settlement and funerary activity. Early assessment of this area is therefore important.
- 4.72. To the south of Blythburgh and north of the B1387 in an area which is topographically favourable for archaeological activity, a large multi-period finds scatter is record (BLB 023), also associated with a large cropmark enclosure (BLB 057). The site of Priors Mill (BLB 024) is also recorded in this field.
- 4.73. To the east of Dunwich road, various cropmark sites (BLB 015, 059, 091 096 and 111) and WWII features are recorded (BLB 040, 102, 103).
- 4.74. Within Tinkers Walk, a Scheduled barrow survives as an upstanding monument (WLB 002), with the cropmark of a further ring ditch to the east (WLB 023). Also present in this area and to south within East Sheep Walk are WWII anti-glider ditches surviving as earthworks (WLB 011, 020, 021, 030) with further military remains recorded on the southern edge of Walberswick Common (WLB 034-036). There is a potential for further earthwork remains and also high potential for well-preserved below ground remains from all periods in this area. As such earthwork surveys and early below ground assessment work would be key for this section of the route.
- 4.75. To the south of Walberswick, an area of extremely high potential for medieval remains is present, believed to be the part of the original extent of the early town and to contain the site of an early church (WLB 010/080) and associated with cropmark features and a large number of finds (WLB 010, 012, 015-018, 024). The area close to Dunwich River and within Oldtown marshes has potential for waterlogged and organic remains, including wooden structures and also boats and remains associated with the medieval port at Walberswick which is recorded in this area. Documentary and desk-based research and full field assessment at an early stage would therefore be critical in this area to understand significance. Preservation in situ is likely to be a consideration for remains in this area. Various WWII remains are also recorded in this area and would require proper assessment and identification of any surviving upstanding remains and structures.

Section from Walberswick to Southwold:

- 4.76. Walberswick Common contains the site of an earthwork enclosure WLB 070 and has the potential to preserve other earthwork features. In addition, there is high potential for well-preserved below ground remains and a particular potential for associated medieval activity. As such earthwork surveys as well as below ground assessment work would be required.
- 4.77. Within Tinker's Reydon and Botany marshes, there is a potential for waterlogged and organic remains, including wooden structures and also boats. A number of timbers are already recorded (REY 046, 047, SWD 006). Mights Bridge (WSD

012) is known to have had early and so the remains of early structures, including the medieval bridge, is possible in this area. There are various military sites also recorded in this area which again require proper assessment and identification of any surviving upstanding remains and structures (e.g. REY 033 063, 065, SWD 016).

- 4.78. Blackshore Mill (REY 021) which is also a listed building is situated adjacent to the river and must not be impacted upon by the scheme.
- 4.79. A large moated fort (SWD 013) is also shown early maps just to south of the landfall site and so documentary research and field-based assessment would be appropriate for this site.
- 4.80. On Reydon common a circular cropmark feature is record (REY 024) and there is potential for below ground remains from all periods given the topographic location and finds scatters recorded in the vicinity.

5. Ecology

General Comments

- 5.1. The ecological information provided with this consultation is limited and does not include comprehensive biodiversity data, hence the response is at a high level. It is noted though that any option has significant ecological challenges.
- 5.2. There is no Biodiversity Survey Report for any of the sites available. SCC suggests that that, when they are undertaken, that they have a similar approach as outlined in the Sea Link consultation.
- 5.3. Only once the Preliminary Ecological Appraisal has been undertaken and the magnitude of impacts upon biodiversity has been assessed in full, can the applicant evidence that site and route selection(s) follow the first principle of the Ecological Mitigation Hierarchy which is: Avoid Harm.
- 5.4. Hence, SCC's comments are at this stage preliminary, based on the limited information available.
- 5.5. Assessments need to consider how this project impacts upon the Conservation Objectives of nearby European Designated Sites, and on other designated sites such as Sites of Special Scientific Interest (SSSIs) and County Wildlife Sites (CWSs).
- 5.6. There are a notable number of NSIP scale projects in the vicinity. The applicant will need to consider in detail the in-combination effects with these NSIPs, including how this project impacts upon other NSIP's proposed mitigation, compensation, and enhancement measures, and in-combination impacts with regard to displaced wildlife due to disturbance from other projects. SCC considers that the applicant's ecological specialists need to work closely with the other project's ecologists around the interaction of impacts on wildlife and habitats.

Assessment approach

- 5.7. Biodiversity Survey Reports should follow Chartered Institute for Ecology and Environmental Management (CIEEM) guidelines: <https://cieem.net/resource/guidelines-for-ecological-report-writing/>
- 5.8. SCC notes that non-statutory wildlife sites (in Suffolk these are County Wildlife Sites) are very important elements of nature conservation and full details can be obtained from SBIS (<https://www.suffolkbis.org.uk/>).
- 5.9. In addition, SBIS can provide the up-to-date lists of Suffolk Priority Species and Habitats. It is important that these are given appropriate consideration and weighting.
- 5.10. SCC would be grateful if all surveys results can be sent to SBIS to update their records. SCC suggest that SBIS are contacted (<https://www.suffolkbis.org.uk/>) to find out the best formats to deliver that data.
- 5.11. Along with MAGIC and other sources of Biodiversity information, it will be critical to consult SBIS but this does not obviate the critical role of ground-truthing. The

Applicant should consult the previous survey reports submitted for other key developments in the area, including EA One North, EA Two and SZC. There is a great deal of information and data within those previous applications and, if all that data is to be considered, this will be a task of considerable magnitude. SCC understands from the Sea Link consultation that that project takes such an approach.

5.12. Along with MAGIC and other sources of Biodiversity information, it will be critical to consult SBIS but this does not obviate the critical role of ground-truthing...

5.13. The Applicant should consult the previous survey reports submitted for other key developments in the area e.g., EA One North, EA Two and SZC. There is a great deal of information and data within those previous applications and, if all that data is to be considered, this will be a task of considerable magnitude. SCC understands from the Sea Link consultation that that projects takes such an approach.

Habitat Regulation Assessment:

Ancient Woodland:

5.14. The Applicant needs to consider parcels of Ancient Woodland. SCC wish to note that SCC is currently carrying out an Ancient Woodland Inventory which may update the records currently available. The Applicant can obtain updates on the Inventory through SBIS (as and when it is available) or contact the SCC Ecology Team who can provide a point of contact.

Invasive Non-Native Species:

5.15. When considering INNS this needs to consider both Flora and Fauna. Fauna in East Suffolk may include Muntjac Deer, Chinese Water Deer, American Mink and, amongst others, non-native species of Crayfish. These deleterious species should also be taken into account.

Other Protected Species:

5.16. SCC would add that, although there are no confirmed reports of Dormouse in the area, an eye should be kept open as this species is expanding its habitat. It will be essential to continuously monitor Badger activity as they are a very successful species across this County, highly mobile (and found in a wide range of places). It is anticipated that a continuous watching brief will be needed and recognising Badger signs made part of regular Tool-Box Talks.

Area of assessments:

5.17. SCC notes that the assessment of designated sites for nature conservation interests may need to be expanded beyond the direct Zones of Influence of the proposal, as, depending on routes for HGVs, workers, materials and so on, other sites *en route* may also be affected. This should be taken into account when researching and writing the PEIR. Impacts may include visual disturbance, dust, noise, air quality and so on.

Mitigation Measures

5.18. Mitigation must be informed by the results and analysis of the Phase One Habitat Survey together with the various species and habitat specific surveys. Although they are just given as examples, the mitigation strategies (in the light of the acknowledged substantial disturbance in this area), may have to be considerably more than at a “normal” stand-alone development.

Biodiversity Net Gain

5.19. It is noted that Sea Link, in its consultation document, pledges to deliver a minimum of 10% Biodiversity Net Gain, which is welcomed and SCC trusts that, similarly, the Applicant for Euro Link will also wish to deliver a minimum of 10% BNG.

Cumulative Effects

5.20. This proposal, in association with the others in a relatively modest geographical area, could well prove to have the most serious consequences on Suffolk’s wildlife and habitats. SCC requires the Applicant to consider any avoidance and mitigation when finalising their proposals and liaise with other developers in the vicinity to minimise harm and support existing mitigation plans.

5.21. There are a notable number of NSIP scale projects in the vicinity. The applicant will need to consider in detail the in-combination effects with these NSIPs, including how this project impacts upon other NSIP’s proposed mitigation, compensation, and enhancement measures, and in-combination impacts with regard to displaced wildlife due to disturbance from other projects. This needs to include all associated infrastructure, such as haul roads, depots, bypasses across all developments.

5.22. SCC expects the Applicant to fully investigate how this proposal can be co-ordinated with the other developments envisaged in the area.

Site Specific ecological comments

5.23. In the absence of the essential biodiversity data (which was only commenced in May 2022), it is not possible to make anything other than general statements about those sites being given preference by the Applicant.

Converter Station Sites:

5.24. Site 3 (East of Saxmundham) is a large arable field and hence may have more limited wildlife interest, although this would be subject to survey results.

5.25. Site 1, West of Aldeburgh was much more difficult for SCC officers to assess from the ground from publicly accessible locations. There are Coverts, dead ground and more dynamic topography here so ecological surveys are required to comment on the ecological value of the site.

5.26. For any of the converter station sites, good design could reduce the ecological impact, for example, using green walls and green roofs for the converter station buildings, or treating the areas around the cables and poles within compounds with, e.g., mosses and lichens.

Cable Corridors:

- 5.27. Landfall between Aldeburgh and Thorpeness - The proposal anticipates cutting through the RSPB's North Warren Reserve. This has the potential to impact upon thousands of Wildfowl (Ducks, Geese and Swans) that over-winter here as well as breeding Bittern, Marsh Harrier, Woodlark and Nightingales. This needs to be fully assessed and considered following the Mitigation Hierarchy. Without a much fuller understanding of the techniques and mitigation(s) being used, SCC raises considerable concerns about disturbance, loss of and sterilisation of habitat. As with the Converter Station Sites, in the absence of ecological data and the fullest mitigation and compensation strategies, the impact on wildlife cannot yet be established.
- 5.28. Landfall for either will be through Coastal Vegetated Shingle, a Suffolk Priority Habitat (hence the designation of so much of this part of the coast as County Wildlife Site). The applicant needs to provide full proposals on how impacts on this habitat are to be minimised and mitigated.
- 5.29. For both the Converter Station Site(s) and the Working Corridors, asking us to hazard a guess in the absence of properly gathered data together with meaningful site walkovers (SCC has tried to gather information by driving and walking as close as SCC could in very limited time) is rather unfair.
- 5.30. For any of the Converter Station Site(s) and the Working Corridors, SCC will require data full assessment together with meaningful site walkovers to be able to form an opinion on the ecological impacts.
- 5.31. SCC raises concern that these routes have been chosen by aerial photography and some maps rather than fully informed by walkovers by ecological specialists. Despite the number of developments in the area, SCC expresses justifiable concern that choices are being made by aerial photos rather than thorough site investigations.

6. Lead Local Flood Authority (LLFA)

Flood Risk

- 6.1. NPS EN-1 only references assessment of Flood Zones 2 & 3 as part of the Sequential and Exception Test. This aligned with the old National Planning Policy Framework (NPPF) which was superseded in July 2021 the current NPPF now requires '*all sources of flood risk and the current and future impacts of climate change*' to be considered as part of the Sequential and Exception Tests. This is further supported by updates to the National Planning Practice Guidance (NPPG) for Flood Risk and Coastal Change in August 2022. As such, all sources of flood risk should be considered as part of the site selection process, with the Sequential & Exception Tests being undertaken for sites where **any** source of flood risk is identified.
- 6.2. For the avoidance of doubt, SCC Lead Local Flood Authority (LLFA) advise Applicants to use the Environment Agency National Mapping, in the absence of site-specific modelling. When using this information, areas of high, medium, and low risk should be considered. Low risk illustrates predicted surface water flood risk for the 1% - 0.1% event. However, in the absence of modelling which accounts for the impacts of climate change, SCC LLFA recommend using the low-risk scenario as a proxy for the 1%+CC scenario.

Cable Corridor sections – drainage and flood risk

- 6.3. Cable corridors should include sufficient space to capture, treat, store and discharge surface water generated through construction activities. Increased runoff rates due to topsoil stripping and from haul road construction will require particular consideration, along with the associated increase in suspended sediment contained in runoff.
- 6.4. Surface water flow routes which are intercepted by proposed cable corridors will also need to be assessed.

Climate change

- 6.5. In accordance with current national guidance, SCC LLFA expect an increase in rainfall intensity of 45% to be used for assessment of surface water drainage.

Friston sub-station

- 6.6. The extent of works required at the Friston sub-station has not yet been determined. It is acknowledged that it will be difficult to assess the impacts of proposed works at Friston given the baseline may change between now and examination/construction of this project, due to other consented projects. However, this location is particularly sensitive in terms of surface water flood risk given the existing flood risk to downstream receptors and therefore it must be adequately assessed.
- 6.7. SCC as LLFA would like to highlight the surface water infrastructure required for the consented National Grid Substation and Scottish Power Renewables Projects may limit the space for works to the National Grid Substation. Changes to this mitigation infrastructure should be avoided wherever possible.

Converter Station Site 1

- 6.8. An assessment of all sources of flood risk should be undertaken, including allowances for current and future climate change.
- 6.9. Areas of surface water flood risk appear to be present within this site location.
- 6.10. Opportunities may exist at this location to re-use surface water runoff from the converter station for irrigation of arable farmland, as the site is directly adjacent an existing reservoir. This would need to be explored further at a later date. SPZ 3.

Converter Station Site 3

- 6.11. An assessment of all sources of flood risk should be undertaken, including allowances for current and future climate change.
- 6.12. Areas of surface water flood risk appear to be present within this site location. SPZ 3.

Converter Station Site 4

- 6.13. An assessment of all sources of flood risk should be undertaken, including allowances for current and future climate change.
- 6.14. Areas of surface water flood risk appear to be present within this site location.SPZ 3.

Converter Station Site 5

- 6.15. An assessment of all sources of flood risk should be undertaken, including allowances for current and future climate change.
- 6.16. Areas of surface water flood risk appear to be present within this site location.SPZ 3.

7. Highways

- 7.1. NGV will be aware that a number of recent NSIPs have been submitted and given consent for the local area. Most notably:
- The Sizewell C Project
 - East Anglia One North Offshore Windfarm
 - East Anglia Two Offshore Windfarm
- 7.2. A large amount of information and data is available from these projects, and this should be considered as part of the development of the NGV proposals. SCC would recommend that there is close collaboration between NGV, NGET, SPR, Sizewell C Co., East Suffolk Council and SCC. The Sizewell C project in particular contains a significant amount of new or improved transport infrastructure that, if the project is completed, will provide more suitable access in the north parts of Suffolk being considered by Euro Link.
- 7.3. As set out in the consultation documentation, NGV are also aware of proposals associated with SEA Link and Nautilus HVDC projects and have considered options for a coordinated approach to the sites. NGV should continue discussions with these projects to minimise highway impacts on the local communities, such as requirements for materials and associated HGV movements, workforce numbers and traffic management on the highway network. All efforts should be made to reduce traffic impacts via a coordinated approach to site location and will be strongly supported by SCC.
- 7.4. As no information is provided on vehicle or construction workforce forecasts, nor on exactly how traffic movements may be reduced through the use of haul roads, the ability for SCC to comment is limited and so SCC's position on impacts at locations may be subject to change.

Assessment Methodology

- 7.5. As set out above a considerable amount of work on traffic impacts has already been undertaken for the local area, and due regards should be paid to the impacts identified within any assessment NGV undertakes, including the potential for cumulative and contiguous impacts and appropriate assessment scenarios. Given the complexity of the impacts in the area (e.g. a number of different projects with different timings for mitigation) assessment scenarios should be agreed with the relevant authorities to ensure impacts are captured. The contiguous impacts SCC considers relevant are the repeated closure or diversion of public highways, including public rights of way, and the increased duration of the impacts that residents, businesses, and highway users will endure as each NSIP follows the previous one within a constrained geographical area.
- 7.6. Consideration in particular should be given to the assessment methodology for environmental effects, as set out in the Sizewell C Project 'Fourth Environmental Statement Addendum' [REP7-030] and [REP7-032], which was agreed between SZC Co. and SCC, including categorisation of links and magnitude of impacts.

Consideration should be given to the scope of the assessed network as part of the East Anglia Projects.

- 7.7. As part of any submission, a Transport Assessment and a separate Environmental Assessment of road traffic should be submitted. SCC considers that early consultation with the Local Highway Authority to determine the scope of such an assessment will be of benefit to the Applicant.
- 7.8. Discussions will be needed over issues around traffic forecasting and the reliability of current traffic data due to Pandemic and Post Pandemic traffic volumes.
- 7.9. Assessment of the impacts on Public Rights of Way should be treated as a specific topic area rather than encompassed within landscaping, social economic or transport sections. This enables a full appreciate of the impacts on the PRow to be evaluated.

Workforce

- 7.10. NGV should bear in mind that due to the number and scale of projects in the area, the availability of the workforce is likely to be limited, and any assumptions around workforce origins would affect the development's traffic impacts. It is important to agree the method for assessing these effects early in the project.
- 7.11. The proposed timings of this project places delivery close to the peak of the Sizewell C construction work force (2028). Hence, there will be considerable pressure on securing workers for these energy projects. It is likely that the demand will require robust assumptions to be made in the workforce assessment model such as distances workers will travel. This, the relatively limited public transport in East Suffolk and location of project elements away from towns will provide a challenge to delivering a Travel Plan to facilitate sustainable travel patterns. Without some innovative measures it is likely that the result will be more, longer journeys by local workers on the local transport network.
- 7.12. The SPR and Sizewell Projects relied heavily on data from the 2011 census although it was recognised at the time that this data was dated and hence treated with caution. All data should be as recent as practical and where assumptions are made these are clearly explained and where possible evidenced.

Pre-commencement

- 7.13. Most NSIPs provide exemptions in the form of permitted works that can occur before commencement of the project. Typically, this includes site investigations, archaeology, and some elements of site clearance. As management plans typically only operate from commencement this has caused issues controlling transport impacts during these pre-commencement works with resultant complaints from local residents. The Applicant should be mindful of this when considering the structure and implementation plans, or for example if pre-commencement works should have separate management plans, as EA1(N).

Reducing Disruption

- 7.14. NGV will need to give strong consideration to how to minimise disruption on the local communities; their potential cable corridor might share its route with other projects and again how to minimise impacts on the local communities and highway network needs to be fully considered, including where appropriate the use of a haul route along the corridor.
- 7.15. Due regards should be paid to the Management Plans and Travel Plans submitted as part of the Sizewell C and East Anglia Projects above, as these will give an indication of the expected management measures, controls, and monitoring for managing freight and workforce traffic to be included within relevant management plans. Where NSIPs overlap this should include measures to coordinate with such measures with other developers so that cumulative impacts are minimised.

Traffic Impacts

- 7.16. SCC will need to understand impacts associated with all traffic during construction, operation, maintenance, and decommissioning, including freight and workforce movements, including the profile of traffic movements. Consideration needs to be given to achieving as sustainable a transport strategy as possible.
- 7.17. Due regards should be paid to those areas where mitigation has been identified for the above projects, including the potential for complementary mitigation to these schemes.
- 7.18. Particular key areas of concern that should be considered on the local highway network are:
- Additional traffic through Leiston, Coldfair Green, Knodishall and Aldringham (B1069).
 - Additional traffic through Saxmundham (B1069, B1119, B1122).
 - Additional traffic on the A12 corridor e.g. Marlesford and Little Glemham (mitigation is proposed as part of both of the East Anglia projects and the Sizewell C project).
 - Additional traffic on the B1069 through Snape (mitigation is proposed as part of both of the East Anglia projects).
 - Additional traffic on the A12 through Farnham and Stratford St Andrew, either prior to or in the absence of the SZC Co. Two Village Bypass scheme depending on the progress of that project.
 - Additional traffic through Yoxford (A12/B1122/A1120) either prior to or in the absence of the SZC Co. Sizewell Link Road (and consideration of local improvements along the B1122 proposed as part of the East Anglia projects and the Sizewell C project).
 - A12 / A1094 junction either prior to or in the absence of the SZC Co. roundabout, which forms part of the Two Village Bypass scheme or in the absence of the A12 / A1094 traffic signal scheme, which forms a road safety measure for the junction, but would only be delivered due to delays to the delivery of the aforementioned roundabout scheme.
 - Additional traffic through Blythburgh (A12/B1125).

- Additional traffic through Westleton and Middleton (B1125)
- A1094 / B1069 western junction.
- A1094 / B1069 eastern junction, which includes some minor road safety mitigation as part of both of the East Anglia projects and the Sizewell C project.
- Increased use of the whole A12 corridor between the A14 Seven Hills Interchange and Lowestoft
- Impacts on local C and unclassified roads use for access to the cable corridor or landfalls
- Impacts on the Rights of Way Network.
- Potential interaction between delivery of mitigation and the Project's traffic (see the Sizewell C Implementation Plan).
- Location of the onshore elements within an area poorly served by public transport and limited pedestrian and cycle infrastructure

7.19. The list above should not be treated being a definitive list of the authority's concerns as these may change as more details of the project are made available.

Access arrangements

7.20. The highway authority will need to understand the proposed access arrangements for constructing the cable corridor. This includes understanding of required visibility and vehicle swept paths in order to provide safe turning movements in/out of each access. This may require relevant speed surveys to understand visibility requirements or potential temporary speed limit changes to reduce impacts on hedgerows etc. NGET should identify what highway powers they will be incorporating within the application so that it is clear how permanent and temporary restrictions on the highway (including rights of way) are to be implemented.

7.21. Details of the connection of the access tracks or crossing points will need to be provided to show that they are safe to use, with the need for an adequate length of access road that is of a suitable width to allow two vehicles to pass safely and that this is not obstructed by gates preventing vehicles leaving the public highway. The access roads will need to be designed to prevent trafficking of mud and debris or the flow of water onto the public highway.

Abnormal Invisible loads

7.22. Further clarification will be needed over the potential for and number of Abnormal Indivisible Loads or abnormal loads that are expected to be generated by the proposed development. Including by relevant categorisation as follows:

- STGO Category 1
- STGO Category 2
- STGO Category 3
- Special order movements.

7.23. As part of the East Anglia One an assessment of the local AIL routes was undertaken, and this should be considered by NGV, along with the work required to understand any structural improvements that are necessary along the corridor.

7.24. In previous NSIPs SCC has highlighted the lack of coordination at all levels to provide and secure suitable access for AILs. The current DfT preferred routes for high and heavy loads are out of date and in any case do not consider AILs that are not special-order movements. While some projects (e.g. EA1(N) provide access to substation sites via haul roads during the construction phase these are not available for other projects nor in the operational phase. With the concentration of energy projects in East Suffolk it is not unreasonable for such infrastructure to be provided to support the industry.

7.25. The cumulative impacts of the energy proposals concentrating sub stations and convertor sites within the Saxmundham – Aldeburgh – Leiston triangle would, unless significant improvements are made to the highway infrastructure, result in these facilities only being accessible by low standard minor rural roads.

HGVs and LGVs

7.26. The Applicant must provide clear definitions of

- HGV, LGV in terms of size,
- Traffic movements i.e. a trip (single movement from an origin to a destination) or delivery (a movement from the origin to the destination and return to the origin)

7.27. Such terms should be used consistently in all documents.

Mitigation and legacy benefit for Public Rights of Way

7.28. Significant discussions will be needed with the SCC PRoW team to minimise disruption and to identify relevant enhancements to the network.

7.29. Consideration should be given towards whether the linear nature of electricity networks infrastructure allows opportunities to connect people to the environment, for instance via footpaths and cycleways constructed in tandem with biodiversity enhancements.

Maintenance

7.30. SCC will look to protect its role to enable it to discharge its legal duties and protect itself against future liabilities. This may be through legal agreement with the applicant, planning obligations, requirements, specific clauses of the management plans or by inclusion of protective provisions.

7.31. It is expected that an agreement will be reached that will allow SCC to recover reasonable costs including but not limited to:

- Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicant's occupation or use of the highway.
- Visual and structural condition surveys of the highway and contributions towards structural repairs.
- Surveys and assessment of highway structures to facilitate AIL movements.
- Damage to the Highway (in accordance with the provisions of Section 59 Highways Act 1980).
- Creation of temporary traffic regulation orders (including SCC consultation and issue of permits).

- Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements.
- Technical approval and inspection of highway accesses and cable crossings as detailed in the approved construction traffic management plan; and
- Review of submitted materials for monitoring the final management plans.

Agreements with Local Highway Authorities

7.32. SCC considers it reasonable, and of benefit to the Applicant, to secure appropriate agreements to develop and implement any highway works and recover its reasonable costs to do so. Discharge of requirements relating to highways, including PRow should be discharged by the LHA after consultation with the LPA.

Regional Access

7.33. The main regional access route is the A12. SCC are currently developing proposals to improve the A12 corridor between A14 'Seven Hills' and A1152 at Woodbridge; however, the proposal is subject to an application for Government funding. Separately, Sizewell C are proposing a bypass of Stratford St Andrew and Farnham; however, these improvements are subject to the project progressing. Despite these potential improvements on the A12 corridor there are a number of areas where transport impacts may occur. Examples would be between Woodbridge and Wickham Market Bypass (congestion / road safety), Marlesford and Little Glemham (traffic impacts on local communities, noise, air quality, vibration, and safety), between Yoxford and Lowestoft (single carriageway roads, road safety).

7.34. Limited road widths on the B1069 through Snape and the poor alignment of the junction of the B1069 and the B1078 at Tunstall make this route unsuitable for construction traffic. There are several aged structures at Snape that will need careful consideration regarding their load carrying capacity. Further south on the A1152 the level crossing and traffic signalised junction in Melton are both considered to be constraints on the local highway network in terms of capacity in peak periods.

7.35. There are several cross-country routes to the north of Ipswich that link to the A14 and / or A140. These are typically narrow winding minor A, B or C class roads (such as the A1120 or B1079) that pass through scattered communities. Some locations such as Coddenham have specific problems (very narrow road through buildings fronting the highway). These routes are unsuitable for construction traffic as has been recognised in recent NSIPs.

Site specific transport comments on the proposed options

Landfall F and cable corridor between Walberswick and Southwold

7.36. Landfall F is only accessible via the ESC car park adjacent to Southwold Pier, in turn accessed via North Road, a residential road with well used on street parking. This road is not considered suitable for significant construction traffic. The landfall impacts on PRow including the Suffolk Coast Path. The area is very well used by tourists even out of season.

- 7.37. The A1095 that provides access from the A12 to Southwold passes through Reydon and has a number of sharp bends adjacent to the Reedbeds and is also susceptible to flooding during high tides or tidal surges. The capacity of structures on the route to carry heavy loads is unknown. The junction with the A12 is at an acute angle making visibility for large vehicles turning south from the A1095 difficult
- 7.38. Between the B1387 and the A1095 haul roads over the soft river valley deposits adjacent to the River Blyth would be needed for access as there are no public highways.

Landfall G and cable corridor between Walberswick and Westleton

- 7.39. Landfall G can only be accessed via the B1387. This road passes through the residential areas of Walberswick, the restricted width making it difficult for two light vehicles to pass particularly as the lack of footways results in pedestrians walking in the road.
- 7.40. The immediate access to Landfall G must pass through a narrow gap in the sheet pile wall forming sea defences for the village via a private road use of which is shared with a public footpath.
- 7.41. Although Lodge Road is a public highway connecting to the B1125 it is mostly unmetalled and impassable to motorised traffic.
- 7.42. The B1125 / B1387 crossroads is not designed to current standards with restricted visibility and geometric constraints. Although used by large agricultural vehicles these typically straddle both lanes particularly at or approaching junctions. Angel Hill (B1125) in Blythburgh is narrow and the lack of footway results in pedestrians having to use the road as access between parts of the village.
- 7.43. The landfall impacts on PRow including the Suffolk Coast Path. The area is very well used by tourists even out of season.

Landfall H Dunwich and cable corridors around Westleton and Middleton

- 7.44. Landfall H and the adjacent cable corridor can only be accessed of Dunwich Road and Minsmere Road. Both are minor local roads and whilst relatively straight are of limited width for use by large construction vehicles. The junction of Dunwich Road and the B1125 is at an acute angle making some manoeuvres difficult.
- 7.45. The landfall impacts on PRow including the Suffolk Coast Path. The area is very well used by tourists even out of season.
- 7.46. The B1125 is narrow in places particularly within the village of Westleton and there are a number of bends between Westleton and the B1125 to the south. Most junctions with minor roads do not comply with modern design standards. Cyclists and pedestrians commonly use the road as footways are generally absent or at best narrow. Other local roads such as Yoxford Road, Mill Road and Fenstreet Road are unsuitable even for single large vehicle movements.

7.47. Within Middleton the roads are very narrow with bends. As with other villages dwellings are immediately adjacent to the road in places and a lack of footways requires pedestrians to use the roads.

Converter Site 4 and B1122.

7.48. Converter site 4 is close to the B1122 which is the main access road to Sizewell A and B. This route provides a reasonable access route to the A12 by construction vehicles provided that the impacts on local communities such as Theberton and Middleton are addressed. The Link Road proposed by Sizewell C will provide a modern route specifically for construction traffic which could, with a suitable connection, serve site 4. However, Moat Road and Pretty Road in their existing condition are not suitable for use by construction traffic.

7.49. To the south and west neither Clayhills Road / Hawthorne Road are suitable as routes for construction traffic. Whilst Harrow Road serves as access to a small concrete batching facility on the old Leiston Airfield this route is constrained by the poor highway geometry on Abbey Lane (adjacent to the B1122), Buckleswood Road (passes through narrow built up area of Leiston) and Buckleswood Lane where a level crossing limits access to and from the B1119 Saxmundham Road.

Converter Site 3, 5 and B1119

7.50. The B1119 is constrained to the west by passing through the centre of Saxmundham, particularly the B1121 / B1119 signalised crossroads. To the east similar constraints exist in Leiston at the B1119/B1122 signalised junction and the adjacent residential areas. Between the two towns the B1119 has a number of sharp bends and localised narrowing making which make use by significant volumes of construction traffic problematical.

7.51. In terms of sustainability with improvements to footways and cycleways Site 4 is the only converter site that could benefit from good connectivity with public transport with Saxmundham Railway Station approximately 800m to the west.

7.52. Access from the A12 to the B1119 from the south (B1121 Benhall), west (B1119 Rendham) or north (B1121 Kelsale) are all constrained by a number of factors such as structures (rail bridge at Benhall, level crossing in Saxmundham, River Fromus bridge in Saxmundham) and safety concerns at all three junctions with the A12.

Converter Site 4, A1094 and B1121

7.53. The B1121 from Benhall through Sternfield to Friston is narrow with sharp bends and road narrowing at the River Fromus bridge. It was discounted as a suitable route for construction traffic in the EA1(N), EA2 and SZC examinations.

7.54. Should the Sizewell C A12/A1094 roundabout be delivered by Sizewell C this removes this junction as a road safety concern. In the absence of the Sizewell C or EA1N/EA2 mitigation works, given the number of turning movements at the A12 / A1094 junction, mitigation is highly likely to be required at this location.

- 7.55. Use of the A1094 east of the A12 is limited by a weight restriction for AILs on the rail bridge at Friday Street, limited road width at some locations, impacts on residents through Snape and safety and capacity concerns at a number of junctions (B1069 Snape, B1121 Friston and B1069 Friston). This is of particular concern with regard to the cumulative impacts across the energy projects in this area. It is likely that mitigation will be required although there are significant constraints that would apply such as limited highway verges, adjacent dwellings, historic buildings, and environmental protections.
- 7.56. Access to the SPR EA1(N) site has been taken from the B1069 south of Knodishall. However, large vehicles except AILs were restricted to using the route from the south and not to travel through Leiston to minimise impacts on this community.
- 7.57. As the A1094 is the major access route to the tourist attractions of Aldeburgh, Snape Maltings and Thorpeness it is used by significant additional traffic in holidays and weekends. This road, and most of the other local roads, is also regularly used by agricultural machinery.

Landfall E and cable corridor north of Aldeburgh, Cable Corridor between A1094 and B1122

- 7.58. In the absence of a haul road, the landfall area can only be accessed from a narrow C road (Thorpeness Road) and by passing through parts of Aldeburgh or Thorpeness. This minor road although straight is narrow and used by significant numbers of cyclists and walkers. In holidays there is significant on street parking outside prohibited areas. As footways in Thorpeness are narrow pedestrians frequently use the road as an alternative.
- 7.59. The B1353 from the B1121 at Aldringham to Thorpeness is relatively narrow, with some bends and crossed by a significant number of PRow. A popular cycle route and the Suffolk Coastal Path traverse the area between the road and foreshore.
- 7.60. Access from the south via the B1122 through Aldeburgh is difficult for large vehicles particularly at the roundabout junction with the A1094/B1122, a matter explored in detail during the SPR EA1(N) examination. To access via the B1122 or B1069 from the north through Leiston has similar issues of narrow widths and restrictive junction layouts.
- 7.61. The landfall impacts on PRow including the Suffolk Coast Path. The area is very well used by tourists even out of season.

Summary

- 7.62. The project documents do not consider the impacts on the A12 corridor between the A14 and Lowestoft. Whilst this route has, with mitigation, been accepted for other NSIPs the impact on this corridor caused by this project partially when taken cumulatively with other consented or proposed schemes needs to be assessed.
- 7.63. Transport access to landfalls with the exception of Site 3 is poor.

- 7.64. The B1122 between Yoxford and Leiston is, with caveats regarding the impacts on Middleton Moor and Theberton, the only route suitable for significant volumes of construction traffic. This route would also be significantly improved if the Sizewell Link Road is constructed. The latter would benefit positioning of the converted site at location 4 and potentially site 3.
- 7.65. The A1094 is the only realistic access route for the cable routes and convertor stations south of Leiston. Even so this route has significant issues if used for construction traffic that will need to be addressed.
- 7.66. Other routes south and west of Leiston such as the B1119, B1121, B1122, B1069/A1052 and the local minor roads are considered wholly unacceptable as routes for construction traffic.
- 7.67. The concentration of energy infrastructure in the Saxmundham – Leiston – Aldeburgh is not being supported by the provision of permanent transport access, for example secure AIL routes.
- 7.68. With the possible exception of Convertor Station 3 all the project options are poorly accessible by means of sustainable transport modes (walking, cycling and public transport) in the construction and operational phases.

8. Landscape and Visual

- 8.1. The following comments on Landscape and Visual are based on the limited information provided by the applicant and two site visits made to the general areas of the scheme's proposals. They take into account SCC's "Evolving Interim siting and design principles, for the connection of offshore wind and interconnector infrastructure in Suffolk" included in Appendix A to this response.

Shortlisted Landfall Location and Converter Station Search Area Options

- 8.2. Within the Non-statutory Consultation Documents four landfall location options and four converter station search areas are identified as being shortlisted. Of these, SCC considers the following have emerged as offering potential for co-ordination with other infrastructure projects:
- Landfall Location Option E, between Aldeburgh and Thorpeness
 - Converter Station site 1 (Aldeburgh), and site 3 (Saxmundham), plus potential site 4 (Theberton/Leiston Airfield).
- 8.3. Only those options that allow for coordination and co-location with other projects can be supported by SCC. Notwithstanding this, for completeness, all options put forward in the consultation are discussed below
- 8.4. It should be noted that the search areas for potential landfall sites, converter stations and the underground cable routes are cast widely and are located within a highly constrained landscape, and in the absence of detailed proposals and mitigation these comments can only be of a preliminary nature.

The Importance of Good Design

- 8.5. SCC notes that 4.6.5 of the emerging Draft Overarching National Policy Statement for Energy, EN-1, suggests that both the developer and the Secretary of State should consider taking independent professional advice on the design aspects of schemes.
- 8.6. Furthermore, SCC notes that the National Infrastructure Straprogramme, ember 2020) states that: "All infrastructure projects to have a board level Design Champion in place by the end of 2021 at either the project, programme or organisational level, supported by design panels"
- 8.7. SCC considers there is the opportunity to achieve a coherent architectural and landscape design approach between all projects at a consolidated converter station site. Furthermore, this approach could be used to support the necessary modifications to the design and layout of the Friston site.
- 8.8. SCC would support the principle of a Design Champion being engaged sufficiently early in the development of the project, and the other projects that are anticipated to use any coordinated site, to oversee the design process. In practice, because this work will need to straddle both architectural and landscape disciplines, two key leads may be required to work in close collaboration.

- 8.9. A Design Champion would have the potential to contribute to the consideration of sustainable design issues and to the integration of the proposals into the landscape at the detailed design, construction, and operational stages of the project. SCC would also support the use of a design review panel, design code/design approach document, and an outline of the design process, setting out key stakeholders, consultees, and the community engagement processes.
- 8.10. The skillset required of a Design Champion has not been clearly defined within the National Infrastructure Strategy. The Institution of Civil Engineers (ICE) and the National Infrastructure Commission Design Group (NICDG) have produced a useful working paper 'Defining and developing the design champion role,' (August 2022), in this respect.

Landfall Location Option E (between Thorpeness & Aldeburgh)

- 8.11. This search area is highly constrained, as it is located within the Heritage Coast and the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. It is close to the Sandlings Special Protection Area and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential. In terms of tourism, Location Option E is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.

Landfall Location Options F, G, and H

- 8.12. Landfall Location Options F, G, and H cannot not be supported in landscape terms, as they are not only located within highly sensitive landscape, but also at a great distance from a potential substation to connect to the National Grid, such as the substation proposed at Friston.
- 8.13. Landfall Location Option F (north of Southwold) is located within the Suffolk and Cost AONB, and the Underground Cable Search Area from this site would be likely to traverse the Minsmere-Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC.
- 8.14. Landfall Location Option G (south of Walberswick) is located within the Suffolk and Cost AONB, and the Underground Cable Search Area from this site would be likely to traverse the Minsmere Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC. The highways access to the site unsuitable and there are a number of Listed Buildings along The Street (B1387), including Grade I Listed St Andrew's Church.
- 8.15. Landfall Location Option H (south of Dunwich) is located within the Suffolk and Cost AONB, and the Underground Cable Search Area from this site would be likely to traverse the Minsmere Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC. The site is located at a tourism hotspot, north of a caravan site on top of eroding cliffs, in a clearing within Greyfriars

Wood, a part of which (further north) is designated as Ancient and Semi-Natural Woodland.

Euro Link Shortlisted Converter Station Search Area Site 1 (Aldeburgh)

- 8.16. Having reviewed the information provided by the applicant and considered the options in this consultation, SCC considers the site unacceptable due to its prominent location adjacent to and overlooking the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and other protected sites.
- 8.17. This site is highly constrained as it is situated in gently rolling countryside within the setting of, and on two sides almost adjacent to, the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, on the outskirts of Aldeburgh, to the north of Hazelwood Hall. It is wholly within the Estate Sandlands landscape of the Suffolk LCA. It is typical of that landscape, consisting of a pattern of regular late enclosure fields, plantation woodlands and coverts characteristic of that landscape type. Whilst the general pattern of the landscape appears to have remained reasonably intact since the 1st edition Ordnance Survey, there have been some modifications to the field pattern and alignment of footpaths. It is notable that the historic trackway known as *Sloe Lane* links the Saxmundham Rd (A1094) to Knodishall Common further north.
- 8.18. The site appears to be elevated by at least 10m relative to the A1094, which runs along the northern side of the boundary of the Suffolk Coast and Heaths AONB. The site is within 2km of the Alde-Ore Estuary SSSI and RAMSAR sites, the Sandlings SPA, North Warren RSPB Reserve, Snape Warren SSSI, the Alde-Ore & Butley Estuaries SAC to the south and further smaller SSSI sites. It is adjacent to Great Wood, an ancient woodland.

Euro Link Shortlisted Converter Station Search Area Site 3 (Saxmundham)

- 8.19. There are a number of listed buildings within the vicinity of this site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting. Saxmundham Footpaths 5 and 6 cross the site and would potentially require diversion.
- 8.20. The land to the north and East of Bloomfield's covert is open arable land, from which all historic landscape features are absent. 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. While the provisional agricultural land classification is slightly better than on site 1, the loss of landscape features would be minimal and the potential for Green Infrastructure benefits and Biodiversity Net Gain would be greater than on site 1. The current landscape is generally open, and a converter station would be prominent from the B1119.

Converter Station Search Area Site 4 (Theberton)

- 8.21. The potential HVDC cable routes to this site are highly constrained and there is no obvious highways access. However, this site could accommodate multiple converter stations so has the potential for coordination.

8.22. The westernmost part of the search area appears to be outside the boundary of the former airfield and therefore retains some limited historic hedge lines. As a result, any development would need to be accommodated within the existing field pattern. It should also be noted that despite the total loss of historic landscape features on the former airfield itself, there are some constraining features, including plantation woodland.

Converter Station Search Area Site 5 (West of Knodishall)

8.23. This site is highly constrained and the development of it would potentially have a detrimental impact upon the setting of listed buildings in Knodishall including the Parish Church which is listed as Grade II*. In terms of archaeology there is a Roman Villa within the boundary which requires early assessment. The landscape includes attractive woodland and belts of trees some of which would potentially be lost. Knodishall Footpaths 14 and 16 cross the site and would potentially require diversion.

8.24. This area retains a simplified pattern of historic field boundaries with later plantations and secondary woodlands, it is part of the Ancient Estate Claylands landscape type. Any Page 6 of 6 development in this area would need to be capable of being accommodated within the existing pattern of enclosures and woodlands. Furthermore, the proximity of Knodishall village would be likely to give rise to adverse impacts that it may not be possible to avoid or appropriately mitigate. Finally, in this landscape extensive new planting has the potential to have an adverse impact on landscape character.

Underground Cable Search Area

8.25. The search area for the underground cable routes that would be required to connect Landfall sites with Converter Station site (HVDC cables), and Converter Station sites to a suitable substation (proposed at Friston) to connect to the National Grid (HVAC cables) are not defined within the wider search area.

8.26. When narrowing the potential locations for Landfall and Converter Station sites further, it will be critical to also assess the potential impact of the resulting cable routes.

8.27. The section of the Underground Cable Search Area between Landfall Option E begins within the Heritage Coast and the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is close to the Sandlings Special Protection Area. The construction of the cable route would affect the Sandlings Walk in several places, as well as other connected footpaths.

8.28. Between the Landfall site and the Converter station a HVDC cable route would be required. From Landfall Option E the connection distance would be shorter to Converter Station site 1 than to site 3.

8.29. Site 1 is located between Landfall Option E and the substation, where it is proposed to connect to the National Grid (at Friston).

8.30. To reach site 3 the HVDC cable route would need to bypass substation (at Friston) either to the north-east or south-west.

- 8.31. After converting the electricity from Direct Current to Alternating Current, an HVAC cable route would then need to connect the Converter station site with the proposed substation (at Friston).
- 8.32. The distance to the substation (at Friston) is comparable for both sites 1 and 3, with site 3 being located slightly closer to the substation.
- 8.33. It should be noted here that for technical reasons the HVAC cable route will require a wider cable corridor than the HVDC cable route. So, although Site 3 would result in a longer HVDC cable route, the HVAC element, which would likely result in greater landscape and visual impacts, would be of a comparable or shorter length as for site 1, but would be further removed from the designated landscape of the Suffolk Coast and Heaths AONB and its setting and highly sensitive ecological sites.

9. Public Rights of Way

- 9.1. The geographic scale of this application encompasses existing Public Rights of Way (PRoW), new PRoW to be provided through the Sizewell C and EA1N &EA2 developments, permissive access, and open access land. Collectively, this access network provides a valuable local amenity to residents for recreation, sustainable travel, and health and wellbeing. They are also significant factors in the tourism offer which includes the nationally promoted England Coast Path, the Suffolk Coast Path, the Sandlings Walk and many other promoted walks and rides.
- 9.2. As such, the Applicant is required to minimise any disruption both to the physical network and to the experience of the many users who value these paths for their natural beauty and tranquillity.

Impact assessment methodology

- 9.3. SCC's position is that the impact on both the physical and the amenity value of the access network should be addressed as a separate theme within an Environmental Assessment. This should include the effect on the physical resource (closure and diversions) and on the quality of user experience with respect to changes to views, noise, air quality, presence of construction traffic and tranquillity. Consideration should be given to the assessment methodology used for access and amenity in the Sizewell C Project which included the assessment of: -
- physical changes to resources (for example, changes to PRoW through diversions or creation of new road crossings)
 - changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality or traffic movements
 - changes to the experience people have when using recreational resources due to increases in the numbers of people using them.
- 9.4. The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works.

Cumulative Impact

- 9.5. The cumulative impact of this proposal with the other existing energy projects consented and proposed in this area is concerning. As set out in the consultation documentation, NGET are also aware of proposals associated with SeaLink and Nautilus HVDC projects and have considered options for a coordinated approach to the sites. NGET should continue discussions with these projects and make all efforts to minimise impacts on the access network for local communities via a coordinated approach to site locations.
- 9.6. There will need to be mitigation, compensation, and management strategies to ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.

9.7. It will be unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects.

Pre-commencement work

9.8. These can typically include archaeological, ecological, site investigations and site clearance and in other NSIPS have not been included in management plans or within the DCO controls for temporary closures. This has caused concern as to the control of traffic using PRoW for site access and how PRoW will be managed during survey and site clearance works. It is suggested that the applicant consider a pre-construction management plan.

PRoW Agreements and Decision making

9.9. Discussions/decisions and agreements relating to public rights of way and open access land should be with the Highway Authority and Access Authority respectively, namely, SCC.

9.10. SCC as Highway Authority should be the discharging authority for any highway works. See Appendix 1 for SCC Guidelines on working with PRoW.

Landfall sites

9.11. All landfall options appear to have a direct impact on the physical access network and on the quality of the access experience - traffic & construction activities, noise & tranquillity, visual impact.

9.12. The choice of siting should seek to minimise the extent of impact on the access network and its users. A site with a single public right of way may appear to be a less impactful option than one with many PRoW, but not if the single PRoW is the only link or the prime amenity area for a settlement. Enhanced access and connectivity to the wider network would be expected as mitigation and compensation.

Landfall	Affected PRoW & amenity FP=public footpath, BR =bridleway, RB=restricted byway, BY=Byway open to all traffic
E	Route of the England Coast Path on Crag Path along the beach, route of the Suffolk Coast Path, public footpaths across Church Farm marshes (Aldeburgh FP6 and FP8), informal access on the old railway line between Aldeburgh and Thorpeness. Extremely well used and valuable access resource for walkers and cyclists
F	Route of the England Coast Path and adjacent to public footpaths alongside Buss Creek. The area is heavily used by residents and visitors all year round
G	Route of England Coast Path and Suffolk Coast Path. Access to site currently along a restricted byway (Walberswick RB 18) which has limited width and weight restriction on the EA maintained bridge over the Dunwich River. The area is heavily used by residents and visitors all year round

H	Adjacent to Dunwich FP13, the route of the England Coast Path, Suffolk Coast Path within the Forestry Commission owned woodland and an area that is heavily used by residents and visitors all year round
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National Grid substation expansion

9.13. The extension of the substation at Friston should not directly affect the physical resource of the existing and proposed new public rights of way at this site, but it will impact on the amenity value of these routes, disruption from the construction phase and the permanent visual impact from the expanded site.

9.14. SCC will expect additional mitigation measures at this site.

Converter site options

9.15. All converter site options appear to have a direct impact on the physical access network and the quality of the access experience - traffic & construction activities, noise & tranquillity, visual impact. Enhanced access and connectivity to the wider network would be expected as mitigation and compensation.

9.16. The choice of siting should seek to minimise the extent of impact on the access network and its users. A site with a single public right of way may appear to be a less impactful option than one with many, but not if the single PRoW is the only link, or the prime amenity area for a settlement; this would be the case for Site 3.

Converter sites	Access network within option areas and sites
Site 1	Route of the Sandlings Walk and network of public footpaths and bridleways serving communities of Friston and Knodishall. Knodishall BR1, 2, and 20, Friston BR12A, BR12, Knodishall FPs 3, 18, 18A,19, 3, 22, and Friston FP13A Proposed cable corridor for EA1N &2 in north part of area E. Site 1 - Friston BR 12A & BR12 and FP13A
Site 3	Saxmundham FP23, Sternfield FPs 5 and 6 FP23/FP6 is the only off-road walking link to the wider countryside on the east side of Saxmundham. It provides green access to the villages and the more extensive access networks in Sternfield and Snape to the south, and Friston to the east.
Site 4	Leiston airfield site. Affected public footpaths are Theberton FP1, 3 and 4. Designated Quiet Lanes network from Kelsale to Theberton.
Site 5	Knodishall FPs 14 & 16

Shared siting with SeaLink

- 9.17. **Converter site 1** contains Sloe Lane, an historic lane and public bridleway used by horse-riders who may be particularly susceptible to disturbance from construction activities. Any proposal to divert the bridleway must ensure that both the physical resource and the quality of the experience for the users is maintained and enhanced. Enhanced access and connectivity to the wider network would be expected as mitigation and compensation.
- 9.18. **Converter site 3** contains a footpath link starting at the pavement on the B1119 at the east edge of Saxmundham heading southeast to link with other PRoW to Sternfield and Snape to the south, and Friston to the east. This footpath is the only link on the east side of Saxmundham to the wider countryside and this link must remain. Any proposal to divert the footpath must ensure that both the physical resource and the quality of the experience for the users is maintained and enhanced. Enhanced access and connectivity to the wider network would be expected as mitigation and compensation.

Terrestrial corridors -options

- 9.19. All the proposed cable corridors impact on the access network. This impact must be recognised, and management measures, alternative routes and mitigation for each affected PRoW affected agreed with the SCC prior to submission of the application. This should consider the physical impact on the network, the impact on the quality and enjoyment of the users of those networks and the cumulative impact of the already consented NSIPS; Sizewell and SPR EA1north and EA2.

Principles for working with Public Rights of Way

- 9.20. SCC expects the following principles to be adhered to for this development at all sites, landfall, converter sites, extension to the National Grid substation and the terrestrial corridor:
- Early engagement with the SCC PRoW & Access Team to discuss the impact on and management of the PRoW & access network. SCC is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.
 - The Applicant must obtain the Definitive Map and Statement from the PRoW & Access Team at SCC. This is the only source of the up-to-date record of the PRoW (supplied digitally).
 - Public rights of way should be marked on plans using the SCC digital data and labelled as per the Definitive Map and SCC convention (Area -parish number - path number)
 - Where PRoW are directly impacted, a pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with SCC as Highway Authority. This should include pre-construction work where PRoW might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles.

- Where impacted by the works, any PROW will be restored to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with SCC.
- Where PROW cross the cable corridor, haul road, access tracks and other sites, the surface must be always kept in a safe and fit condition for all users to the satisfaction of SCC.
- Pre-construction works must not obstruct or disturb any public rights of way (e.g., new fencing, archaeology surveys etc) unless otherwise agreed with SCC. Management measures or temporary closures not covered in the DCO must be by application to SCC.
- Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to always use with management measures put in place with the agreement of SCC.
- Any temporary closure of a PROW must be agreed with SCC and the duration kept to the minimum necessary
- An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure to a standard agreed with SCC
- The location of alternative routes to be agreed with SCC.
- Any alternative route must be safe and fit for the public to always use – suitable surface, gradient and distance with no additional road walking between the natural destination points.
- Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route – process and cost to be agreed between applicant and SCC.
- There will be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.

10. Corporate Property

10.1. SCC has checked the non-highway property records and believe the following SCC premises are potentially affected:

- Coldfair Green Primary School - Site 1 and Site 3 Emerging Preference
- Alde Valley Academy - Site 1 Alternative
- Leiston HWRC - Site 3 Alternative Option 1
- Alde Valley Academy - Site 3 Alternative Option 2
- Southwold Former Fire Station
- Middleton Causeway Farm

10.2. The impact and necessary mitigation to these sites can only be established when there is greater detail.

10.3. The schools only look to have playing fields within the areas.

11. Socio-economic

- 11.1. The EuroLink multi-purpose interconnector project is one of four projects proposed by the promoter, National Grid, in Suffolk, for delivery in the late 2020's.
- 11.2. Local partners, including SCC and the New Anglia Local Enterprise Partnership, share a high-level ambition to ensure energy infrastructure developments actively support a sustainable regional and national supply chain, with the direct benefit of increased employment, education, and training opportunities for residents. SCC is also working to ensure that the project fully and appropriately considers the character, function and sensitivity of the natural and historic environment and landscape of the county and its importance to a thriving tourism sector.
- 11.3. Preliminary discussions indicate that National Grid recognise the significant economic, employment, education, and training opportunities that this project and the further East Coast projects, for connection by 2030 represent. SCC is keen to ensure, through mutual benefit and collaboration, the socio-economic opportunity of these is maximised. Therefore, these projects should be approached as a single meta project and not solely on their own merits.
- 11.4. Suffolk has natural geographic advantages, that mean it will play a huge part in achieving the UK's ambition to reach Net Zero. Therefore, the cumulative opportunity and negative impacts (such as adverse impacts in the visitor economy, churn, and negative displacement in local employment) of all this development must be at the forefront of National Grid's thinking, as further details of these projects are developed.
- 11.5. National Grid will be aware that a number of NSIPs have been consented for the local area. Most notably:
- The Sizewell C Project⁵:
 - East Anglia One North Offshore Windfarm⁶
 - East Anglia Two Offshore Windfarm⁷
- 11.6. A large amount of information and data is available from these projects, and this should be considered as part of the development of the EuroLink proposals. SCC considers there needs to be close collaboration between NGV, SPR, Sizewell C Co., East Suffolk Council and SCC.

Economic Development, Employment, Education and Training

- 11.7. As an individual project, EuroLink, offers no substantial opportunity in its own right. However, it should be viewed as one of the many individual projects that National Grid Plc via NGET and NGV are delivering in region and SCC expects

⁵ <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/>

⁷ <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/>

to work with National Grid Plc to deliver a package of training, skills and growth opportunities that engages with the local supply chain strategically across all local projects e.g., Bramford to Twinstead and East Anglia Green overhead lines and SEA link interconnector.

11.8. The project is also likely to be in construction at the same time as the Sizewell C and ScottishPower Renewable Hub are reaching the peak of their construction employment. There is a very high likelihood that achieving any home-based labour will be extremely difficult as these projects will be well established. SCC expects the applicant to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions. SCC also expect the applicant to reflect these findings within all topic areas where workforce origin will have an impact, such as:

- Traffic and Transport
- Communities
- Accommodation

11.9. It is essential that the applicant works collaboratively with the Local Authorities to maximise the inward investment, socio-economic and skills benefits of these projects, ensuring the best possible deal for the communities that are hosting this vital Net Zero transmission, connection and generation infrastructure which has significant impact on them and their environment.

11.10. In line with National Grid's own findings, in their publication Building a Net Zero Workforce, ensuring a workforce with the right skills, is available at the right time, and a capable supply chain, is not only paramount to ensuring the successful delivery of Net Zero ambitions, but also crucial to ensuring Suffolk is able to maximise all the positive impacts of this project, whilst mitigating any negative impacts.

11.11. SCC will expect National Grid to work with them to understand how they can enrich and enhance measures in place that are already working to deliver legacy employment, education and skills benefits alongside growth and investment in a sustainable local supply chain.

11.12. Co-location and coordination of the converter stations and cable routes will allow for an efficient use of resources within a constrained local labour market.

Tourism & Visitor Economy

11.13. Suffolk offers a rich and varied tourist offer known for its heritage assets and landscape designations, such as, the Suffolk Coast and Heath AONB and Heritage Coast. This project and its associated onshore infrastructure need to fully assess its direct and indirect impacts on all of these known features and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for recreational activity alongside quantifying the impact of construction on tourism assets and visitor numbers. More broadly it is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during onshore works period.

- 11.14. When considering the cable routes some routes will be more sensitive than others due to the tourism businesses located on the route. Undergrounding, although advantageous in the long term, will also cause greater impact during construction due to the width of cable swath required and the increased time to install. SCC expect the applicant to consider all of this throughout the consultation period.
- 11.15. A co-ordinated approach to these proposed developments would be preferable for several reasons.
- 11.16. Coordination will lessen the disruption for visitors, if a single site were utilised, it would cut down on the number of road closures/diversions. Suffolk is investing in marketing itself as an attractive destination for a “main” holiday as well as short breaks. If visitors are spending money on a holiday for a week or a fortnight, they will wish to be confident that they won’t spend it being unable to visit certain attractions or destinations or stuck in traffic due to diversions.
- 11.17. Coordination will also assist with combating the potential perception that Suffolk is dominated by construction sites. A potential visitor to the region may be deterred by the thought of Suffolk as a destination if there is the possibility of several large-scale power projects being worked on at the same time. Any diversions need to be carefully planned with tourism impacts in mind, with appropriate mitigation.
- 11.18. SCC is seeking to ensure that accommodation of construction workers and other non-home-based workers is of benefit to the visitor economy and would like to see any initiatives complementing the tourist season rather than disrupting it. Depending on the timing of the construction work, it could be possible for accommodation to be utilised in the shoulder months, for example. This could complement the main tourist season (and Autumn/Winter weekend breaks) rather than disrupting it. The potential for using accommodation out of season is strong and could be beneficial to the hospitality sector as it seeks to fully recover from the pandemic.

Community impacts

- 11.19. A project of the scale and nature proposed, even more so cumulatively with other major infrastructure projects in the vicinity, will change the sense of place, the place attachment of the residents, and the recreational amenities of the affected villages and communities. The in-combination effect across topic areas of these residual impacts on the local community and its wider wellbeing need to be considered and mitigated. SCC expects an appropriate mitigation/compensation package for local communities. This would be in addition to any potential community benefits from the development.

Appendix B - Siting and design principles, for the connection of offshore wind and interconnector infrastructure in Suffolk

The purpose of this document is to set out at a high level, siting and design principles for offshore wind and interconnector infrastructure. Sections A, B and C, reflect the hierarchy of priorities that is, strategic principles, operational infrastructure, and its associated harm, and finally, temporary infrastructure related to construction and its associated harm. Within each of these sections the *numbered* principles included are prioritised.

It should be noted that this document recognises the national importance of strategic energy infrastructure and therefore, in section B, sets out limited and specific circumstances where it may be appropriate to consider sites both adjacent to, or within, Nationally Designated Landscapes, particularly if these are brownfield or previously developed sites. This would need to satisfy the national planning tests for development within or adjacent to a Nationally Designated Landscape, or within its setting.

Furthermore, these principles are predicated on the idea that coordination is desirable and appropriate in all cases, and at all scales. The intention of such coordination is to effectively minimise harm to Suffolk's communities and environment, that is, in terms of, strategic offshore connections, co-location and consolidation of onshore infrastructure, and coordination of construction activity.

Strategic principles

1. Where it is necessary to connect offshore wind to a landing point in Suffolk, this should wherever possible, be connected to a multipurpose interconnector to minimise the extent and adverse impacts of onshore infrastructure
2. Offshore transmission infrastructure should, wherever possible, be directed to the principal point of electricity use. In the south-east of England this is currently anticipated to be in the region of the Thames Estuary.
3. Project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate, co-locate, and consolidate infrastructure, both their own and those of other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment.
4. Project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate the construction of projects, both their own and those of other promoters, wherever possible, to minimise the extent and duration of adverse effects on communities and the environment.

Converter/substation station siting and operation

These principles also apply to grid connection infrastructure, including NGET substations, sealing end compounds, and related transmission equipment

5. The first preference for siting should be brownfield sites/previously developed sites that meet the required planning tests.

6. In the absence of appropriate brownfield sites/previously developed sites, consideration should be given to new sites adjacent to existing built development, specifically, industrial, or commercial development.

7. Sites adjacent to, or within the setting of, an AONB or National Park should not usually be considered at all, unless exceptionally, and in recognition of the need to deliver strategic net Zero energy infrastructure,

AND

to the satisfaction of the decision maker, there are no alternative sites available outside the setting of the AONB or National Park.

OR

the site meets criteria 5 and/or 6

AND

The development is capable of being effectively mitigated, such that during its operation, it will have only, to a minimal extent, non-significant direct, or indirect, impacts on the designation. (The accumulation of multiple non-significant impacts, such that together they become significant, is to be avoided)

8. Sites within an AONB or National Park should not usually be considered at all, unless exceptionally, and in recognition of the need to deliver strategic Net Zero energy infrastructure,

they meet criteria 5 and/or 6,

AND

alternative sites outside the AONB or National Park are, to the satisfaction of the decision maker, deemed not to be available

AND

the development can be effectively mitigated such that during its operation, it will only have, to a minimal extent, non-significant impacts on the designation. (The accumulation of multiple non-significant impacts such that together they become significant, is to be avoided)

9. Other sites within AONBs and National Parks that do not meet criteria 5 and 6, should only be considered, if it is conclusively demonstrated to the satisfaction of the decision maker, that there are no alternatives.

10. Following the application of 1-9 above, preference should be given to sites that meet the following criteria:

- The site *and* cable corridors should minimise or eliminate permanent adverse impacts on the fabric of the landscape, historic features and character, or ecological features such as trees, hedges, woodlands wetlands etc
- Harm to built heritage assets and their setting should be minimised, substantial harm should be avoided.
- Minimise adverse impacts of noise on public and residential amenity

Cable corridors an associated haul and construction access routes should avoid or minimise permanent loss of buried archaeological features.

Minimise adverse impacts on landscape and visual amenity, and existing public access through the inherent characteristics of the site, or because the site can be adapted to successfully mitigate such adverse effects.

Does not add to local surface water or fluvial flood risk OR provides an opportunity to eliminate such additional risks as may be created.

Can achieve acceptable operational site access, and where required temporary construction access, which can be reasonably remediated following commencement of site operation.

C) Cable Corridors, temporary haul routes, and construction access and laydown

12. Cable corridors, associated haul routes and construction access, should avoid, or minimise temporary loss of trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife.

14. Cable corridors, associated haul routes and construction access should avoid or minimise temporary adverse impacts on public and private amenity in respect of noise, dust and other disturbance.

15. Cable corridors, haul routes and construction access should be located and designed in such a way that they are capable of effective restoration.

Appendix C - Maps

