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NGV EuroLink Consultation,
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Dear NGV,

EuroLink Non-Statutory Consultation

Suffolk County Council welcomes the opportunity to comment on the National Grid Ventures (NGV) proposal for a 2GW Multi-Purpose Interconnector (MPI) between the Netherlands and the UK, that is offered by this consultation. The principal concerns of the Council are set out in detail in its full response and are also summarised as follows.

The need case for the EuroLink connection at this location is not made

The Council 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, the Council 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.

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 harmful sites along the wider East coast that could be suitable for this MPI. The Council notes that NGV 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.

It is noted that the Council understands that, unlike MPIs, the Sea Link project must, in order to deliver the necessary network reinforcement, be connected in Suffolk.

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 is assumed could reduce the terrestrial harm of the project. The Council 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 2022. Therefore the Council 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.

The need for coordination between Sea Link, Eurolink and Nautilus

The Council is responding to this consultation on the basis that both Euro Link and Nautilus MPIs, promoted by NGV, and Sea Link, promoted by NGET, will be connecting in Suffolk, notwithstanding the above, and notwithstanding NGV's current efforts to secure a connection for Nautilus at the Isle of Grain in Kent.

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, the Council considers that co-location of projects (including Sea Link) and coordination of cabling, construction and schemes of mitigation is essential. Therefore, cable landing points and potential converter station sites, that do not support such coordination are unacceptable to the Council.

Need for an exemplary approach to minimising long-term impact

Given the sensitivities and cumulative pressure on the area, the Council 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.

Where there are residual impacts that cannot be avoided, mitigated by design, or by further mitigation, the Council 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 the community, and left to be weighed against the benefits delivered by the scheme, without first following all the steps of the mitigation hierarchy.

Summary of the Council's site-specific responses

Converter Station Site 1 (Aldeburgh): Although potentially capable of achieving coordination, the Council considers that Site 1 is unacceptable, by virtue of its elevated location adjacent to two boundaries of the Area of Outstanding Natural Beauty, and in a gateway location adjacent to Aldeburgh and Snape.

Converter Station Site 3 (Saxmundham): The Council recognises that Site 3 does have significant constraints, and further assessment needs to be undertaken as to the practicalities and impacts of this site. The Council also recognises that if this site is taken forward, the total length of all cable trenching would be longer. However, the length of the wider and more technically challenging AC cable corridor would be significantly less, so much so that NGET have, in their Sea Link consultation, identified Site 3 (Saxmundham) as the cheapest option in terms of capital expenditure.

Converter Station Site 4 (Theberton/Leiston Airfield): The Council recognises that Site 4 (Leiston Airfield) does have significant constraints, and further assessment needs to be undertaken as to practicalities and impacts of this site. It is noted that in its current consultation, Sea Link has either not considered or has discarded without explanation this site as an option; however, the Council is encouraging NGET to re-consider this site as it would be capable of co-location.

Converter station site 5 (Knodishall): This site is not acceptable to the Council, including due to its inability to accommodate more than one project.

Landfall sites at Dunwich (H), Walberswick (G) and Reydon (F): These proposed landfall sites are unacceptable, due to their environmental impacts and length of cable route through sensitive landscapes, and they would not allow for coordination with Sea Link, as these are not considered viable options NGET in their Sealink consultation.

Landfall site between Aldeburgh and Thorpeness €: This proposed landfall site, and cable routing to a converter station site, has substantial ecological and other challenges and constraints, which need to be fully assessed.

Yours sincerely,



Councillor Richard Rout
Deputy Leader and Cabinet Member for Finance & Environment