



## **Sea Link Grid Reinforcement**

Statutory Consultation

Suffolk County Council Response

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December 2023

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## 1 Introduction

- 1.1 The following comments by Suffolk County Council (the County Council) are in response to the Statutory Consultation stage, including the Preliminary Environmental Information Report (PEIR), for the Sea Link proposals held between 24<sup>th</sup> October and 18<sup>th</sup> December 2023 by National Grid Electricity Transmission (NGET).
- 1.2 The proposals consist of the construction of 2GW High Voltage Direct Current (HVDC) undersea electricity link between Suffolk and Kent, with the onshore infrastructure in Suffolk consisting of a converter station, onshore Direct Current (DC) cables, onshore Alternating Current (AC) cables and a transition bay. The AC cables will connect the converter station to the consented but as yet unbuilt NGET substation at Friston in East Suffolk which will entail its extension.
- 1.3 Sea Link has been designed to coordinate with two further projects with regards to the option to provide additional ducts from the landfall, along the cable corridor and the size of plot for the converter station site. However no commitments have been offered to achieve that coordination with other projects.
- 1.4 The County Council electoral divisions which will be directly affected by the scheme include the following: -
  - Aldeburgh and Leiston
  - Blything
  - Kessingland and Southwold
  - Wilford
- 1.5 The first section of this representation outlines the key issues which the County Council has identified, which has been informed by our technical specialists, whose comments are provided in Appendix A. The County Council has also set out a structured approach to the issues posed by this and other proposed developments coming forward 'Siting and Design Principles for Offshore Wind and Interconnectors in Suffolk' which can be found in Appendix B.

## 2 General Comments

### National Policy

- 2.1 The County Council acknowledges the need to increase renewable energy generation, the increasing demand for new additional generation and the UK Government's legal obligation to achieve Net Zero emissions by 2050, as supported by research and publications by the Committee for Climate Change.
- 2.2 The Government issued the revised version of the National Policy Statements on 22 November 2023, with the amendments having full effect in relation to 'those applications for development consent accepted for examination, after the designation of those amendments', which will include the Sea Link proposals.

2.3 The National Policy Statement, EN-1, is the UK Government's overarching strategy for energy. The County Council would like to draw the applicant's attention to the following assessment requirements: -

- *'Applicants for Critical National Priority (CNP) infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.'*
- *'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced, or mitigated.'*
- *'Applicants should set out how residential impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored, and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.'*

2.4 The National Policy Statement (EN-5) is the UK Government's strategy for electricity network infrastructure. This policy statement applies to transmission systems and associated infrastructure (e.g. substations) and sets out the general principles that should be applied in the assessment of the application for development consent.

### **Suffolk County Council Energy and Climate Adaptive Infrastructure Policy**

2.5 The County Council has declared a climate emergency and is therefore predisposed to support projects which are necessary to deliver Net Zero Carbon for the United Kingdom (UK).

2.6 The County Council updated its energy infrastructure policy in May 2023<sup>1</sup>, setting out its overall stance on projects required to deliver Net-Zero Carbon for the UK. However, proposals will not be supported unless the harms of the projects alone, as well as cumulatively and in combination of other projects, are adequately recognised, assessed, appropriately mitigated, and if necessary, compensated.

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<sup>1</sup> Suffolk Energy and Climate Infrastructure Policy  
[www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf](http://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf)

- 2.7 The policy also sets out how, in principle, the County Council will engage with and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions. The County Council expects to have comprehensive and effective engagement with developers and their supply chain partners to maximise the local business opportunity, skills aspirations, and employment benefits. Where appropriate, the County Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.
- 2.8 The County Council expects projects to deliver appropriate community benefit schemes in addition to the necessary compensation and/or mitigation in accordance with the requirements of the regulator, Ofcom for Environmental Net Gain.
- 2.9 As part of the County Council's Centre of Excellence, the Council is currently developing guidance supplementary to this policy, to provide a strong technical steer to project promoters of future NSIP applications as to what they have to consider and provide to the Council, e.g. in terms of assessment approaches and types of mitigations. This will leave the County Council in a stronger position for future engagement and negotiations with project promoters.

### **Need for the Project**

- 2.10 NGET makes a case for its need to reinforce the network in and between East Anglia and the south-east of England for four main reasons:
- i) The existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore)
  - ii) The growth in offshore wind, interconnectors, and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport
  - iii) As a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses
  - iv) Upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.
- 2.11 NGET states that, before considering building new parts of the network, it considers if existing network infrastructure can be upgraded, e.g. by building new substations, improving the transmission circuits using thicker conductors/wires on existing overhead lines, or adding smart power control devices to control the flow of electricity on parts of the network where power is needed. However, according to the company, these upgrades do not adequately address the shortfall in network capacity and several new network reinforcement projects are required, of which Sea Link is one.

- 2.12 According to NGET, Sea Link deals simultaneously with overcoming constraints in East Anglia – by connecting new power generation and reinforcing the Bramford to Sizewell radial circuits transferring power from the Sizewell Generation Group - and the Southeast - increasing the amount of power that can be transported to and from the south-east, helping to meet domestic demand as well as imports and exports to Europe via interconnectors.
- 2.13 Therefore, it should be noted in particular that in the strategic options report included in this consultation by National Grid states that:
- "To enable power transfer from the Sizewell Generation Group, it is necessary for all options to have a northern connection point in the Sizewell area."

### **Consideration of Alternatives**

- 2.14 Four options are considered by National Grid in the detailed strategic options report. Three offshore connection options, and one alternative onshore pylon option were considered. The alternative onshore option was identified as LL1, between Sizewell and Canterbury, although this had lowest capital cost, the lifetime costs were higher, the lifetime costs were increased by the likely cost and complexity associated with tunnelling under the river Thames. Therefore, this alternative option was not considered any further by NGET.
- 2.15 In September 2023 Suffolk, Norfolk, and Essex county councils published a report that they had commissioned from Hirons Smart Energy Networks, to review the NGET proposals for East Anglia network reinforcement, with a focus on the need for, and timing of, the proposed 400 kV line from Norwich to Bramford to Tilbury.
- 2.16 The report found that the need case for the Norwich to Tilbury pylon line was flawed, and that it was therefore unlikely to be required before 2035. The report also found that the timely development of the Bramford to Twinstead pylons and the Sizewell to Richborough HVDC link, (Sea Link) provides an opportunity to pause the development of the Norwich to Tilbury pylons, until future generation requirements a clearer and the need case has been reviewed.

### **Project Engagement**

- 2.17 The County Council has been disappointed with the quality of engagement on the proposals, both with technical departments and with the community, particularly around socio-economic and tourism issues.
- 2.18 Thematic meetings have failed to engage with all technical stakeholders with some departments, including the Lead Local Flood Authority (LLFA) not having a meeting in advance of the release of the Statutory Consultation.
- 2.19 Engaging effectively with a community already extremely concerned with the potential cumulative impacts of several NSIP proposals in their area is essential in building trust and allowing both sides to understand the potential impacts and potential opportunities for mitigation through community benefits.

2.20 If this is not improved upon, the County Council will raise these shortcomings in its Adequacy of Consultation response at the time of submission.

### **Sea Link Proposals Allowing Coordination with Other Projects**

2.21 The County Council maintains its stance that coordination between projects, including the utilisation of closely parallel onshore cable routing, should be a top priority in order to minimise the impacts upon the Suffolk coastline

2.22 In respect of this stance, the County Council notes that the Sea Link proposals have been designed to coordinate with two further projects with regards to landfall at Aldeburgh, the converter station site east of Saxmundham, and the cable corridor from landfall to the converter station, via the proposed substation at Friston. This would be in accordance with **National Policy Statement EN-5 2.15.1** which states that coordinated approaches to delivering offshore and onshore transmission, to minimise overall environmental, community and other impacts, as set out in detail in EN-5, must be considered.

2.23 The County Council expects that the laying of additional ducts will be undertaken if there is any possibility that further projects could use the same route in the future. This could minimise considerable further disruption along the route of the cable corridor for future projects.

2.24 NGET have requested feedback regarding the potential design approach for the proposed converter station site. It is important to consider that any potential design which is chosen would in effect set the design principle for further converter stations if other projects were to utilise this site. Furthermore, the County Council considers it essential that NGET, as the first occupier of the site, demonstrates how three projects will be effectively accommodated.

2.25 Therefore, a preliminary masterplan would need to be developed for the site in consultation with relevant statutory consultees, to accommodate up to three converter station sites.

2.26 The County Council also considers that the masterplan should be developed in consultation, through a working group, with the Town Council of Saxmundham the other relevant parish councils, as defined in Schedule 1 of the Infrastructure Planning (Applications and Prescribed Forms and Procedure) Regulations 2009.

### **LionLink Emerging Proposals and their Coordination with Sea Link**

2.27 While the Sea Link proposals allow for coordination, LionLink, in its recent supplementary Non-statutory consultation, continue to consider options where coordination with Sea Link would not be possible. This consultation put forward landfall options at Southwold and Walberswick which would fail to coordinate with the Sea Link proposals regarding landfall and subsequent cable routing to the converter station site.



- 2.28 The County Council continues to expect the fullest possible coordination and co-location of the cable corridors and infrastructure between Sea Link and the emerging proposals for LionLink, in order to minimise the combined impacts of the two projects. Any proposals that reduce the level of coordination would require robust justification as to why greater coordination is not achievable, including a full assessment of increased levels of impacts across both projects.
- 2.29 Failure to coordinate with LionLink could lead to the County Council objecting to the LionLink proposals at the next stage of consultation due to the lack of coordination with Sea Link.
- 2.30 The County Council responded to the LionLink supplementary non-statutory consultation in November 2023.

### **Coordinated Consenting Approach**

- 2.31 The principle of sub-sea interconnectors is an important aspect of an offshore centred approach. However, at this point, the outcomes of the Offshore Coordination Support Scheme (OCSS), and the review of connections in East Anglia, which are to be undertaken by National Grid Electricity System Operator, are unknown. Therefore, it is not possible to come to a reasonably informed preliminary conclusion about this project.
- 2.32 The County Council notes the OCSS funding announcement by Government on 5 December 2023 that a consortium of Sea Link and the offshore windfarm proposals of North Falls and Five Estuaries will receive funding to explore coordination between the projects, however, until there are some preliminary conclusions regarding this work, it does not affect the County Council's current stance.
- 2.33 Given the spatial interdependencies of Sea Link and LionLink and the expectation of the amended National Policy Statements (NPS) for coordinated approaches, the County Council consider it essential for the National Grid Group to fully align the two projects both spatially and with their timing and development of their consenting in order to minimise the impacts of their projects on the communities and environment of the area. Such an approach would also be in accordance with both the amended National Policy Statements (NPS) and National Grid's own Responsible Business Chapter. However, the recent Non-Statutory Consultation put forward landfall and cable route options which would not allow coordination with the Sea Link proposals.

2.34 The alignment of project development and consenting by the National Grid Group would potentially allow the Planning Inspectorate (PINs) to consider both projects simultaneously, using a single panel of examiners to achieve coordinated consenting. This approach not only would reduce the impact of the consenting process on communities and statutory consultees, but it would also allow for a more efficient and effective examination of the issues relating to coordination and cumulative impacts and therefore could significantly improve public confidence regarding the consenting and delivery of these projects.

### **Cumulative Impacts**

2.35 Current timelines suggest that Sea Link will be under construction alongside several other NSIPs in the same area, including Sizewell C, LionLink and those promoted by Scottish Power Renewables (SPR).

2.36 Significant impacts are expected with regards to traffic on the routes leading to, and in proximity, to the Suffolk Coast, local housing, services, and labour supply.

2.37 The County Council encourages NGET to continue discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, National Grid Ventures, and Scottish Power Renewables to minimise highways impacts on the host communities with regards to requirements for materials and associated HGV movements, workforce numbers and traffic management on the highways network.

2.38 The accumulation of several NSIPs under construction at the same time is expected to impact tourism both in visitor perception and visitor numbers on the Suffolk Coast, and the County Council considers it essential that the promotor engages with local businesses and the host communities to discuss potential impacts and community benefits.

### **Highways**

2.39 Co-ordination of this project with LionLink would reduce the overall impacts in terms of transport.

2.40 The authority is not content with the suitability of a number of the routes proposed for construction access and further information is required to assess the positive and negative impacts of each of the three proposed new access routes including the permanence or otherwise of the three new access roads and potential legacy benefits for the area.

2.41 The methodology and findings of the environmental assessment require further detailed examination. To assist this more precise labelling and description or links and junctions is required.

2.42 Where assumptions are made, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, assumptions made for the sensitivity of receptors.

2.43 The cumulative impacts of this project with Sizewell C (SZC) have been underestimated, particularly on the A1094 corridor.

- 2.44 Repeated projects in the same area have a sequential impact on communities such as repeated disruption due to road closures.
- 2.45 The reliance on energy projects to use shift patterns to avoid worker trips during network peaks may in combination result in new peaks at the time workers arrive and depart.
- 2.46 If a local port is proposed for the offshore elements of this project a Port Traffic Management Plan may be applicable.

### **Tourism**

- 2.47 As previously noted in the County Council's response to Sea Link's non-statutory consultation, Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast.
- 2.48 The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particularly the extent to which its 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.
- 2.49 The County Council considers it imperative that the Sea Link also considers its part in the cumulative impact on the perception and propensity of people who visit the area during the onshore construction works.
- 2.50 The County Council is seeking to ensure the accommodation of construction workers and other workers who are not home based to be to the benefit of the visitor economy rather than disrupting it. For example depending on the scheduling of works, utilising accommodation that is available out of season that could compliment the tourist season.
- 2.51 The applicant should identify businesses, in particularly associated with recreation and tourism in close proximity to the red line boundary of the scheme, to assess potential impacts to these organisations of the construction works and access routes.

### **Overview of the County Council's Position on the specific proposals**

- 2.52 The County Council considers it essential that the Sea Link project in Suffolk must fully coordinate consenting, construction, and operation, with the Lion Link project; and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.
- 2.53 While the County Council notes that the previous and unacceptable options, which were included in the non-statutory consultation, have been discarded, the option put forward still has significant challenges, which include: -
- temporary and permanent access for construction and operations upon completion
  - the need for a masterplan for the converter station site

- the requirement to coordinate construction operations with other projects in the area, to minimise impacts on the surrounding transport network.

2.54 Management plans in outline must be provided at DCO stage, to be discharged in detail once main contractors are appointed following any consent. The Council considers that it would not be acceptable for final management plans to be secured only as part of the initial DCO submission.

### **Design Principles**

2.55 In the response to the non-statutory consultation held in 2022, the County Council included siting and design principles for the connection of offshore wind and interconnector infrastructure in Suffolk (Appendix B).

In addition, the following design principles should also be considered:

- **Engagement** with Parish Councils, local residents and relevant authorities.
- **Design** should be sensitive to place, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration, and finishes.
- **Height** – Substation building, and ancillary equipment will be kept to a minimum and the slab level will be set at the lowest practical level.
- **Landscaping** to minimise visual intrusion and respond to local landscape character and biodiversity, to be considered in the building design and layout of ancillary structures.
- **Embedded ecological mitigation and enhancement** with particular attention to lighting, large areas of glass and the baffling of noise sources.
- **Sustainable Urban Drainage (SUDs)** to be developed in accordance with DCO requirements.
- **Engagement** – Through development of final design and landscaping proposals providing opportunity to engage with the local communities who will be directed impacted by the substation.
- **Design Review** – The design should be subject to design review, in consultation with the relevant local authorities.

### **3 Site specific key Issues raised by the technical comments**

3.1 This section provides a brief summary of key issues raised by the technical departments of the County Council. These should be read in conjunction with the full technical comments on the proposals and the PEIR which can be found in Appendix A

#### **Proposed Converter Station Site – Saxmundham**

3.2 The converter station site is located on land to the north and east of Bloomfield's Covert on the eastern boundary of the small town of Saxmundham.

- 3.3 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 B1119 which enters Saxmundham from the southeast.
- 3.4 The site is constrained with regards to access due to the road network around the area, with the B1119 generally unsuitable for construction and subsequent operational traffic. It is acknowledged that new temporary and/or permanent routes which bypass Saxmundham are in development, subject to further discussions with District and County Councils.

#### Archaeology

- 3.5 The area has not been subject to systematic archaeological assessment, therefore the character, extent, and significance of any surviving above and below ground heritage assets have yet to be defined.
- 3.6 Construction works have the potential to damage or destroy surviving archaeological remains so the area will require geophysics followed by trenched archaeological evaluation. Any reductions to this will need to be approved by the Suffolk County Council Archaeological Service (SCCAS).

#### Highways

- 3.7 The B1119 provides the only existing access to site. For access from the west, all traffic would need to pass via Saxmundham and from the east through Leiston, both of which have significant constraints besides the impact of the construction traffic on the communities.
- 3.8 The County Council requires further information to assess the positive and negative impacts of the three proposed access routes including the permanence or otherwise and potential legacy benefits for the area.

#### Landscape and Visual Amenity

- 3.9 The County Council considers it essential for any landscape strategy for the converter station site to proactively plan for successful co-location with other projects on this site.
- 3.10 A landscape masterplan must be developed for the whole site with a focus to minimise harm to the landscape and visual amenity resulting from this, considering integration into the landscape using landform and landscape led cut and fill as well as mitigation in the form of screen planting.

#### Local Lead Flood Authority

- 3.11 National mapping for the area suggests soils have poor properties for infiltration, therefore the County Council would encourage the application to explore opportunities for infiltration through compliant testing at the earliest opportunity.

## Public Rights of Way

3.12 The site crosses Saxmundham Footpaths 5 and 6 and would therefore require diversion.

## Proposed Landfall Site

### Landscape and Visual Amenity

3.13 The proposed landfall site is located between Aldeburgh and Thorpeness, within the Heritage Coast, Suffolk Coast and Heath Area of Outstanding Natural Beauty (AONB) and close to the Sandlings Special Protection Area (SPA) and the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential.

### Lead Local Flood Authority

3.14 As works at these locations are temporary in nature, focus is to ensure surface water is adequately managed during construction. Where possible, works should avoid areas of existing flood risk, with suitable mitigation in place where this is not possible.

### Highways

3.15 The landfall area can only be accessed via a narrow C road which passes through parts of Aldeburgh and Thorpeness. Access from the south through Aldeburgh is difficult for large vehicles, which was a matter explored in the examination for EA 1.

3.16 The site is constrained due to access as the surrounding roads are unsuitable for HGV and Abnormal Indivisible Loads (AILs).

## Proposed Cable Route

### Archaeology

3.17 The route is sited within a favourable location for archaeological activity. The majority of the area will require full archaeological assessment as has not previously been subject to systematic assessment.

3.18 Given the interaction with the EA1N/2 scheme 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/2 geophysical survey data and trial trenching results are publicly available as part of the relevant examinations and the SCCAS are also happy to advise on the findings where reports are not yet available.

### Ecology

3.19 The promotor must be aware that the area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which support a variety of bird species, such as woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna.

### Landscape and Visual Amenity

3.20 The cable route from the landfall begins within the Heritage Coats, Suffolk Coast and Heaths AONB and is close to The Sandlings SPA. The construction of the cable route would affect the Sandlings Walk in several places, as well as other connected footpaths.

### Local Lead Flood Authority

3.21 As works at these locations are temporary in nature, focus is to ensure surface water is adequately managed during construction. Where possible, works should avoid areas of existing flood risk, with suitable mitigation in place where this is not possible.

3.22 Where possible works should avoid areas of existing flood risk, with suitable mitigation in place where this is not possible.

## **Friston Substation**

### Archaeology

3.23 The County Council notes much of the substation site has been subject to archaeological assessment as part of Scottish Power Renewables (SPR), East Anglia One North and Two (EA1N/2) scheme, however, further assessment will be required for any areas which fall outside works undertaken by SPR.

### Highways

3.24 The County Council is concerned regarding the lack of information on the amount of Abnormal Indivisible Loads (AIL) movements there will be during construction works. It is stated in the PEIR that construction vehicles will access the Friston site from the north of Friston, however for SPR projects, such vehicles are intending to use a haul road from the B1069 south of Knodishall. The scope of the PEIR does not show the highway network impacted by access to Friston substation, which is an area of concern to the County Council.

3.25 The EA 1N/2 project considered that the B1121 through Friston was inappropriate for use by construction vehicles and proposed access to the substation. The promotor of Sea Link does not appear to be following this approach which is of concern to the County Council. The County Council also argued in the examination that the B1119 between Saxmundham and Leiston is also unsuitable for construction traffic, but NGET have identified this route for use for Sea Link.

3.26 Action is required to provide more detailed information regarding vehicular movements during construction, particularly AILs. NGET must also reassess their proposed construction routes around Friston, noting previous issues raised in the examination of EA1N/2.

### Local Lead Flood Authority

- 3.27 Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors and therefore must be adequately assessed.
- 3.28 It is noted that the Preliminary Environmental Impact Report (PEIR) chapter on existing flood risk and drainage fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the County Council as LLFA under the Flood and Water Management Act 2010.

#### **4 Summary of Technical Feedback on General Proposals**

- 4.1 This section provides a brief summary of comments from the County Council technical departments. These should be read in conjunction with the full technical comments on the proposals and the PEIR which can be found in Appendix A.

##### **Archaeology**

- 4.2 The archaeological implications of multiple schemes in this landscape are cumulatively increasing for every project and the County Council notes that options for coordination have been included for other projects, which would increase impacts as it reduces the flexibility to be able to avoid significant archaeology which has yet to be defined.
- 4.3 The County Council recommends that a full assessment is undertaken at the earliest opportunity as there is a high archaeological potential for all current areas being considered as part of the scheme, the majority of which have not being subject to systematic archaeological investigation.
- 4.4 The results from other projects are showing that there is an enormous amount of important archaeology surviving within this landscape, which had previously not been known about, and some of the proposed areas for this scheme fall within busy geophysics areas which have been avoided by Scottish Power Renewables project East Anglia One North and Two (EA1N/2), but adjacent areas had discovered extensive archaeology.
- 4.5 All ground investigation/mitigation works must be covered by an Overarching Written Scheme of Investigation (OWSI). This would detail all types of ground investigation and mitigation with full detailed definitions and the need for further site specific WSIs. The OWSIs and all subsequent WSIs would need to be approved by SCCAS.

##### **Community Benefits and Project Legacy**

- 4.6 The County Council encourages the promoter to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated.



- 4.7 Secondary mitigation should be in addition to any community benefits from the development, including any arising from emerging requirements in the expected guidance on Community Benefits foreshadowed in the British Energy Security Strategy and now proposed in the Government response to consultation (November 2023).
- 4.8 The County Council also encourages project promoters to consider legacy opportunities of all elements of their development.

### **Ecology**

- 4.9 The County Council acknowledges that the Ecology and Biodiversity Chapter alongside the Phase 1 Habitat Survey has provided a good starting point in understanding the challenges of the development sites.
- 4.10 However, in terms of Ecology and Biodiversity moving forward, the County Council would like to see the following: -
- The full suite of survey data as a result of the on-going ecological survey work.
  - The establishment of an Ecology Working Group consisting of the Applicants' experts and key stakeholders (including from LPAs).
  - Consideration of the cumulative impacts of this proposal with other projects on the Suffolk coast.
  - A flexibility of approach to surveying and subsequent mitigation, compensation and enhancement measures which have been informed by comprehensive walkovers and other means of gathering biological data.
  - Consulting and working with key stakeholders to prepare a Construction and Ecology Management Plan (CEMP) showing how successful mitigation will be implemented and achieved.

### **Highways**

- 4.11 The County Council is not content with the sustainability of the number of routes being proposed for construction access.
- 4.12 The County Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic, including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.
- 4.13 Abnormal Indivisible Loads (AIL) routes must be surveyed to prove there is a viable route to the converter and substations.
- 4.14 Where assumptions are made regarding estimation of HGV movements, worker numbers and profiles, they must be evidenced.
- 4.15 Cumulative impacts of this project with Sizewell have been underestimated, particularly on the A1094 corridor. Repeated projects in the same area will have sequential impacts on the community such as disruption caused by road closures.

- 4.16 The reliance on energy projects to use shift patterns to avoid worker trips during network peaks may in combination result in new peaks at the time workers arrive and depart.
- 4.17 The County Council encourages discussions with the developer over weight restrictions on bridges along the proposed construction traffic routes.
- 4.18 The County Council notes that the sequential delivery of NSIPs on the east coast i.e. EA1, EA3, EA1(N), EA2, SZC and potentially Sealink and LionLink will impact communities on a recurring basis. This will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users besides local residents. The County Council considers these Sequential Project Effects should also be considered or at least require enhanced mitigation or deliver legacy projects that offset this impact.

### **Landscape and Visual Amenity**

- 4.19 The County Council considers that a clear vision for landscape for the whole project, and in particular the Converter Station site must be developed for the Environmental Impact Report.
- 4.20 While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Mitigation Hierarchy will need to be applied in full, including compensation for impacts that result in adverse landscape and visual effects that cannot be avoided or mitigated through embedded measures.

### **Local Lead Flood Authority**

- 4.21 The County Council, as Lead Local Flood Authority (LLFA), suggests that general consideration should be given to the return period to which construction drainage is designed, ensuring there is sufficient space within the Order Limits to accommodate such drainage provision.

### **Public Health**

- 4.22 With regards to Employment and Income, the section does not account for impacts to the existing local economy, but only additional jobs related to the scheme (Chapter 12 Health and Wellbeing: Appendix 1.4.A Outline Code of Construction Practice).
- 4.23 The County Council recommends more could be done with respect to the monitoring and mitigation of impacts on Air Quality as a result of construction operations and additional traffic, which will significantly increase. Of particular concern is of a Primary School being identified as being in close proximity of one of the sites, as children are more vulnerable to the effects of pollution.
- 4.24 The County Council recommends installation of live pollution sensors to accurately monitor levels of all pollutants not just NO<sub>2</sub>, particularly by the schools and residential developments identified.

### **Public Rights Of Way (PRow)**

- 4.25 The County Council considers it essential that PRoW should be addressed as a separate topic in the PEIR and therefore disagrees with the approach taken by the developer where the consideration of effects on PRoW and their users is covered across several chapters of the PEIR. This has made it difficult for the relevant officer to comment on the effects of the proposals on PRoW.
- 4.26 The division of the effects of the development on PRoW across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for that receptor, then they could be significant.
- 4.27 The County Council would like to see a commitment to keeping PRoW open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum.

### **Socioeconomic**

- 4.28 The construction period for Sea Link is predicted to coincide with Sizewell C Nuclear Power Station. It is anticipated there will be significant pressure on the available workforce, also considering other projects in the area such as LionLink. This could reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel.
- 4.29 The promoter expects that a large proportion of additional jobs, created by the Sea Link scheme, to be taken by those outside of the study area, with only 32 net additional jobs being expected to be taken up by residents, due to the jobs being specialised construction. The County Council finds this unacceptable, particularly with the number of infrastructure projects taking place in the area, including those proposed by the promoter.
- 4.30 A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the County Council would support a strategic approach to this issue.
- 4.31 The County Council disagrees that Operational Employment was scoped out due to limited numbers, as this issue should have been considered alongside other projects in the region, which will amplify any effects caused.

## **5 Appendix A – Detailed Technical Comments**

### **Introduction**

5.1 The County Council has gathered technical comments from its technical departments regarding the details contained within the Statutory Consultation.

5.2 The full list of technical comments are as follows:

- Archaeology
- Ecology
- Landscape
- Lead Local Flood Authority
- Minerals and Waste
- Public Health
- Public Rights of Way
- Socioeconomic

### **6 Archaeology**

6.1 As a general comment, 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. Geophysical survey and monitoring of GI works are underway with Written Schemes of Investigation submitted and approved by SCCAS, but no results have been seen.

6.2 The archaeological implications of multiple schemes in this landscape are cumulatively heightening for every project and we note that options for co-location of elements of this scheme with the LionLink project are included. These would increase impacts. Although we 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.

6.3 The results from other projects are also showing that there is an enormous amount of important archaeology surviving in this landscape, which we previously knew nothing about (and some of the proposed areas for this scheme fall within busy geophysics areas which EA1N/2 had avoided, but adjacent to areas where the trenches identified extensive archaeology).

#### **Friston substation**

6.4 In the Friston substation area, the majority has been subject to geophysical survey and trial trenching as part of the EA1N/2 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/2 scheme.

### **Cable Corridor**

6.5 The preferred cable route is 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 has, however, never been subject to any systematic archaeological investigation and so the full archaeological potential is currently unknown. The entire cable route (including all locations of permanent and temporary structures) therefore requires full, early archaeological assessment (desk-based assessment, geophysics, and trenching).

### **Landfall**

6.6 Whilst the landfall method is proposed to be a drilled system 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. SCCAS would need more details of the exact construction/drilling method (including depths) and how this would affect hydrology (using GI information) and therefore preservation any remains that may exist. This would inform any mitigation if necessary. It should not be assumed that drilling of cables is without impact without sufficient evidence.

### **Onshore Works**

6.7 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 beyond the preliminary assessment in suitable detail. 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.

6.8 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. All areas of proposed works will require geophysics followed by trenched archaeological evaluation. Any reductions to this will need to be agreed and approved by SCCAS.

- 6.9 Undertaking full archaeological evaluation early 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 will test the suitability of sites for development, given the reduced flexibility for mitigation through design now that a location for landfall, converter station site, grid connection substation site, cable route, jointing bays, link boxes and HDD pits have been selected. 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.
- 6.10 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.
- 6.11 All ground investigation/mitigation works should be covered by an Overarching Written Scheme of investigation (OWSI). This would be a process document, detailing all types of ground investigation and mitigation with full detailed definitions and the need for further site specific WSIs. It should be a flexible document include systems to adapt to changing plans and updated information. The OWSI and all subsequent WSIs need to be approved by SCCAS. All stages of the work will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled.
- 6.12 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.

6.13 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.

### **Setting**

6.14 SCCAS does not advise on setting, and we would defer to Historic England and Local Authority Heritage Advisors. Having said this 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.

6.15 A detailed 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 using historic mapping and Historic Landscape Characterisation data.

6.16 Earthwork survey and building assessment should be undertaken of upstanding remains, particularly Second World War remains, to properly assess their significance and enhance our understanding in the context of the defensive coast.

### **General Comments**

6.17 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.

6.18 Details about avoiding bentonite breakout should be included and procedures defined if it occurs (in areas defined for excavation or preservation in situ). Archaeological features can act as “weak points” allowing the bentonite a route to the surface or to infiltrate sub surface features.

6.19 Similarly, if there is bentonite breakout elsewhere controls would need to be in place to avoid disturbance of areas under archaeological preservation in situ. These cannot be disturbed by the movement of topsoil from sites to create bunds to stop the bentonite flooding elsewhere.

6.20 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, this may require borehole/coring/test pitting to characterise potential or more detailed survey as part of mitigation.

- 6.21 Given the interaction with the EA1N/2 scheme 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/2 geophysical survey data and trial trenching results are publicly available as part of the relevant examinations and the 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.
- 6.22 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.

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- 6.23 The potential for extensive and yet unknown archaeological is not adequately recognised by the supplied documentation and current proposals for assessment are not sufficient to fully understand the archaeological impacts of proposals and to enable informed decisions to be made.
- 6.24 Having said this SCCAS welcomes that this document notes the need to do further assessment with the intention that:
- 6.25 “The ES will be further informed by results of other data gathering exercises that are currently being undertaken or are proposed before the submission of the ES. These include a review of aerial photographs and LiDAR data, geophysical survey, archaeological walkover survey, documentary research (including a map regression exercise), and archaeological monitoring of Ground Investigation works.” (2.4.4.9,) (essentially a full desk-based assessment enhancing on the PIER)
- 6.26 Paragraph 2.4.3.6 also notes that to inform the ES process geophysical survey and evaluation trenching will be undertaken. This is necessary and it must be completed at an early stage to define archaeological mitigation that may be required. If delayed, results from trial trenching (and other investigative methods) have the potential to become a point of objection when we get to examination if not yet undertaken.



- 6.27 2.4.6.2, “The extent of the proposed study area is the standard for these types of projects,” (The developer needs to reference the source regarding standards for ‘this type of project’). SCCAS requires that HER (and other methods) searching should be at least 1000m in rural setting (for the DBA) and 3000m for designated monuments and please include Parish codes alongside MSF/MSX UIDs in future documents utilising HER data.
- 6.28 2.4.8.3 All of the archaeological mitigation options (H0-H6) will require extra specific detail when included in the OWSI. Strip map and excavate and watching brief will need to be defined and described further (i.e. controlled strip, continuous monitoring, frequency of visit etc) as will protection methods and regulations if H01 is appropriate.
- 6.29 2.4.9.1 – preliminary assessment of NDHAs is generally fine as all mention mitigation, however there is potential in some circumstances for micro siting (i.e. measure H02) but this would only be based on new information from survey/trenching etc.
- 6.30 1.4.A.2.97 We would need more details of all “trenchless” construction methods in archaeological assessments (DBA) to better understand impact.
- 6.31 Figure 2.4.1 is in error – it only shows event records on the HER not Monument records.
- 6.32 We support co-location, but regardless, DBAs need to highlight works done in advance of other schemes and areas where cable routes or others such permanent or temporary structures overlap.
- 6.33 The various assessments detailed from 2.4.12 to 2.4.26 are in general sound, although .13m (Gorse Hill), .17 (Hazelwood Aerodrome) .21 (Decoy Pond) need much more specific detail re: effects, investigation, and mitigation.
- 6.34 For all the= identified assets detailed from 2.4.12 to 2.4.26 further detail on management/mitigation is necessary but this should be available when the various mitigation option H0-H6 are better defined and detailed in the OWSI.
- 6.35 Decommissioning work also has the potential to have an impact, but this is not currently recognised within documentation. This overlooks the potential for remains which are being preserved in situ and therefore need to be protected from disturbance throughout all phases (including during any maintenance works). Also, the compounds and access etc. associated with this work also have the potential to impact upon below ground remains if located in areas which have not already been subject to archaeological mitigation.
- 6.36 SCCAS welcomes the preliminary assessment of impacts on the setting of various listed buildings, however it is possible that further unknown yet visible assets are identified (e.g. through Aerial photography, earthwork survey or cartographic investigation) that may require inclusion into such reports.

## 7 Ecology

### Sea Link Ecology Comments:

7.1 These comments have made reviewed those made during the previous non-statutory consultation phase, the Ecology chapter of the current statutory consultation, the Phase 1 Habitat Survey and attended a Local Planning Authorities briefing presented by the Applicant. I have also had an opportunity to join a site visit hosted by the Applicants.

### Summary

7.2 The Applicant has prepared helpful and useful documents that (with only one or two comments as set out below) have been prepared to a good standard. There is, however, the critical point that survey work is on-going, and it is only when the actual data – as a result of the survey work is compiled and presented – is available that we shall be able to make more constructive comments.

7.3 Critically, it is the Applicants' assurance that an Ecology Working Group will be set up in the near future which will enable the Local Planning Authorities and the other key natural environment stakeholders to make an informed contribution to this matter.

7.4 The County Council now await:

- The survey information and data.
- The setting up of the Ecology Working Group.
- Appropriate mitigation, compensation, and enhancement to be set out in a Construction and Environment Management Plan (or similar document).

### Previous Comments:

7.5 In response to the non-statutory consultation, our initial comment was that “*The ecological information provided with this consultation is limited...*” That still remains the case.

7.6 The County Council also expressed concern about how this proposal will impact upon biodiversity in combination with every other NSIP or other relevant proposal at this part of East Suffolk. The County Council is concerned that this does not appear to have been addressed in detail.

### The Current Consultation:

7.7 The statutory consultation has set out a lot of the “how” and “why” of the survey work required and the approach to obtaining the essential survey information seems satisfactory. It is only upon the reports and analysis being available to the environmental stakeholders that we can carry out a meaningful interrogation of the data.

- 7.8 One of the critical tools to allow the stakeholders to do this will be the establishment of an Ecology Working Group. This was touched upon at the recent engagement session by the Applicants for LPA Officers and, in the view of the County Council, this should be established at the earliest opportunity in order to ensure that the appropriate bodies are represented and agree terms of reference.
- 7.9 The current consultation has narrowed down the proposed areas for the cable corridor and converter station site(s) (e.g., land east of Saxmundham) and confirmed that there will not be any new overhead power lines. This is welcome as the land in question can be thoroughly surveyed for biodiversity interest and potential.
- 7.10 The County Council also welcomes the Applicants' policy to:
- Minimise ecology and biodiversity effects.
  - To avoid significant adverse effects.
  - To deliver positive enhancement required (BNG).
- 7.11 The Applicants also state that, where the Environmental Impact Assessment (EIA) identifies opportunities to enhance biodiversity, this will be dealt with in the Planning Statement. Opportunities will be sought for "nature inclusive design" and there will be a "Biodiversity Management Strategy." All these points are most welcome, and the County Council looks forward to engaging with the Applicants via the Ecology Working Group to gain an understanding of what this will mean on the ground.

#### **Scoping Out of Invertebrate Surveys:**

- 7.12 PINS has agreed with the Applicant that Notable Invertebrate Surveys should be scoped out of the data required. The County Council would like to see this reconsidered in the light of any encounters during the on-going walk over surveys that have taken place during the warmer months. The County Council does accept that the techniques being described to deliver the cable corridor may obviate the necessity for those surveys but would prefer to wait until the walkovers are complete before completely dismissing the necessity for these surveys.
- 7.13 **Scoping Out Riparian Mammals Surveys:** Similarly to the above, the County Council would like the up-to-date walkovers to inform this decision.

#### **Rivers and Streams Generally:**

- 7.14 Should it appear necessary that any dam and pump work is required, The County Council would expect that it will be compliant with The Eels (England and Wales) Regulations 2009.

#### **Badgers:**

7.15 The County Council accepts the need to keep records confidential. The County Council would add that Badgers in East Suffolk are very successful and highly mobile. Alertness to Badger signs and constant monitoring of the entire development are essential.

### **Survey Data:**

7.16 The County Council would be most grateful for confirmation that all biological data gained as a result of the surveys informing this proposal is sent to Suffolk Biodiversity Information Service (<https://www.suffolkbis.org.uk/>).

### **Phase 1 Habitat Survey:**

7.17 This is a comprehensive document which has been thoughtfully and well prepared although the Applicants' surveyors acknowledge the incompleteness of the work through, e.g., lack of access.

The County Council has the following queries:

- Some trees that the Applicants' surveyors thought of as having low potential for bats should be climbed and inspected (by suitably licensed surveyors) if they are likely in any way to experience disturbance and in any event if they are to be cut back or removed.
- Ponds that may or may not be suitable for Great Crested Newts could be eDNA tested? In any event, the County Council would anticipate HSI studies (as per: <https://www.arguk.org/info-advice/advice-notes/9-great-crested-newt-habitat-suitability-index-arg-advice-note-5/file>).
- When will it be possible for those areas not yet accessed to be surveyed?

### **Conclusions:**

The Applicants have provided a good starting point in both the Ecology and Biodiversity Chapter and the Phase 1 Habitat Survey of the Statutory Consultation.

It has been helpful to see the options narrowed down.

What will now be helpful (in terms of Ecology and Biodiversity) will be:

- The full suite of survey data as a result of the on-going ecological survey work (and including the comments made above).
- The establishment of an Ecology Working Group consisting of the Applicants' experts and key stakeholders (including from LPAs).
- Consideration of the in-combination impacts of this proposal with others in the area.
- Flexibility of approach to surveying (and then mitigation, compensation, and enhancement measures) informed by comprehensive walkovers and other means of obtaining biological data.

- Consulting (and working with) the key stakeholders to prepare a Construction and Ecology Management Plan (CEMP) or similar document showing how successful mitigation will be implemented and achieved.

## **8 Highways**

The County Council as Highway Authority makes the following high-level comments on the PEIR and supporting documents: -

- 8.1 Co-ordination of this project with LionLink would reduce the overall impacts in terms of transport.
- 8.2 The authority is not content with the suitability of a number of the routes proposed for construction access.
- 8.3 Further information is required to assess the positive and negative impacts of each of the three proposed new access routes including the permanence or otherwise of the three new access roads and potential legacy benefits for the area.
- 8.4 ALL routes need to be surveyed to prove that there is a viable route to the convertor and sub stations.
- 8.5 The methodology and findings of the environmental assessment require further detailed examination. To assist this more precise labelling and description of links and junctions is required.
- 8.6 Where assumptions are made, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, assumptions made for the sensitivity of receptors.
- 8.7 Regrettably, the County Council has had insufficient resources available at this time to full examine the preliminary assessment of impacts.
- 8.8 Additional surveys and data collection is required to inform the Environmental Statement and Transport Assessment.
- 8.9 The cumulative impacts of this project with Sizewell C (SZC) have been underestimated, particularly on the A1094 corridor.
- 8.10 Repeated projects in the same area have a sequential impact on communities such as repeated disruption due to road closures.
- 8.11 The reliance on energy projects to use shift patterns to avoid worker trips during network peaks may in combination result in new peaks at the time workers arrive and depart.
- 8.12 Further assurance is required regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.
- 8.13 If a local port is proposed for the offshore elements of this project a Port Traffic Management Plan may be applicable.
- 8.14 Whilst accepting that the operational and decommissioning phase is scoped out of the ES and TA the latter should be managed through a requirement.

## Highway Comments

Reference should also be made to the County Council's comments during the Non-Statutory Consultation in December 2022.

### PEIR Non-Technical Summary

- 8.15 Table 3-1 estimates construction during 2026-2030. This will coincide with SZC Peak Year and may coincide with SPR EA1(N) and EA2 dependant on their start date (potentially late 2024, early 2025).
- 8.16 The County Council would strongly support co-location and co-ordination with LionLink (3.6.2) both during the DCO process and construction phase (if consented). This would hopefully reduce the overall transport impact on Suffolk.
- 8.17 The County Council encourages the developer to engage with the authority as the Local Highway Authority and East Suffolk as the Local Planning Authority to discuss and where possible the methodology including scoping of surveys for the EIA (4.3).
- 8.18 It is unclear if consideration access tracks will include visual and landscape impacts of any permanent or temporary bridges and earthworks associated with these tracks (5.1.4).
- 8.19 The number of vehicles quoted in 5.7.1 appears to be for two-way journeys and thus there will be a maximum of 946 single direction trips of which 258 will be single direction HGV movements. It is unclear how many Abnormal Indivisible Loads (AIL) movements there will be. In 5.7.2 such vehicles will access the substation site north of Friston (Figure 2.9.3) although for SPR construction vehicles are intended to use a haul road from the B1069 south of Knodishall. The scope of the Pier as shown in Figure 2.9.3 does not show the highway network impacted by access to the Aldeburgh / Thorpeness Landfall nor the Friston Sub-Station, areas that are of concern to the authority.
- 8.20 It is noted in 5.8 that no air quality baseline surveys are proposed for the B1121 through Benhall or Kelsale and just a single location in Saxmundham. the County Council would be interested to understand if these areas have been scoped out of the assessment.
- 8.21 In 5.10.2 it would appear that Public Rights of Way (PRoW) aspects are included in Social-Economic, Recreation and Tourism an also in Health and Wellbeing (5.11.2). the County Council has a strong preference that PRoW's are considered as their own unique topic.

- 8.22 The County Council would refer NG to the SZC DCO and Deed of Obligation to see the definitive list of highway schemes associated with this project <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/> . Similarly, the Construction Traffic Management Plan and Access Management Plan gives details of highway mitigation schemes associated with the SPR EA1(N) and EA2 projects <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/> . the County Council has recently secured funding for the A12 Major Road Network (MRN) Scheme between the A12/A14 Seven Hills Interchange and the A12/A1152 Woods Lane Roundabout north of Woodbridge <https://www.suffolk.gov.uk/council-and-democracy/council-news/government-backs-a12-road-improvements-with-funding-commitment> This is anticipated to be delivered between mid-2025 and mid-2027.
- 8.23 The County Council notes that the sequential delivery of NSIPs on the east coast i.e. EA1, EA3, EA1(N), EA2, SZC and potentially Sealink and LionLink will impact communities on a recurring basis. This will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users besides local residents. the County Council considers these Sequential Project Effects should also be considered or at least require enhanced mitigation or deliver legacy projects that offset this impact.

### **Design Drawings**

- 8.24 Noted that Figure 2.9.3 does not show the order limits to the coast nor the Suffolk Road Network to be used to access this part of the scheme.
- 8.25 Drawings S42\_S/TDD/SS/0013 and 14 clearly show one of the main advantages in terms of reduced impact of combined construction of the ducts in that only a single haul road is required for all three projects yet if delivered separately each project would need construction and removal of a haul road. It is noted that the drawing refers to future ducts. The County Council would prefer that the ducts are install in any case allowing later installation of the cable, the same as for EA1 and EA3.

### **Bellmouth Drawing**

- 8.26 Existing highway presumed to be a wide two-lane road. This is not the case with most Suffolk roads which are generally not this wide nor straight. Drawings show the use of temporary traffic signals, a matter not yet discussed with The County Council. No visibility splays are provided for the accesses nor forward visibility to traffic signals noting that both are dependent on the speed of vehicles using the highway. In the County Council's opinion the design of a bell mouth is a specific operation as a generic design cannot account for the characteristics of each location.

**PEIR**

- 8.27 Table 2.8.4 states that the operational phase is scoped out from further assessment but would raise the matter of access to this and other adjacent energy sites in terms of HGVs and ALLs if required during the operational phase. The County Council is concerned that the locations are not accessible by large vehicles particularly if highway mitigation, for example haul roads, have been removed post construction.
- 8.28 Whilst the study area for transport was agreed with SPR for the EA1(N) DCO this was revised when considering the in combination impacts of the SPR projects and SZC. This resulted in the scope being widened in Figure 2.2 in the EA1(N)& EA2 Sizewell C Cumulative Assessment Note [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004035-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20\(Traffic%20and%20Transport\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-004035-ExA.AS-6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf).
- 8.29 The County Council is concerned that the cumulative impact of this project with the consented EA1(N), EA2 and SZC when combined with this project and potentially LionLink may have significant impacts on the A12 as far south as the A12/A14 Seven Hills Roundabout.
- 8.30 As a minimum a sensitivity test should be undertaken to ensure that traffic from the three combined connector schemes do not exceed 30% (2.8.4.7), nor should this value of 30% be taken as definitive as uncertainties are built into the original base surveys and increase as assumptions are applied within the methodology. the County Council would expect the IMEA Rule 1 and 2 to form the starting point for assessment
- Rule 1 Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
  - Rule 2 Include highway links of high sensitivity where traffic flows have increased by 10% or more
- 8.31 It would be helpful to define the meanings of primary general traffic, LGVs and HGVs (2.8.4.9), for example is an HGV considered to be >3.5 tonnes or >7.5 tonnes?
- 8.32 When considering sensitivity (2.8.4.16) reliance should be placed on data rather than using professional judgment as the latter is open to challenge.
- 8.33 The identified peak year of construction of 2029 (2.8.4.14) would mean that this project will be being constructed as Sizewell C reaches its peak construction year. Therefore, the County Council considers that the SZC peak year traffic data should be used in the cumulative impact assessment.



- 8.34 The County Council would welcome discussions regarding the sensitivities proposed in table 2.8.6 to table 2.8.10 with a view to agree these. For example, the County Council considers that the length and duration of diversion has an impact on delay and that the use for PRowS (table 2.8.10) should be based on evidence rather than judgement.
- 8.35 The road links referred to in 2.8.6.3 do not include that on the B1122 from Yoxford through Leiston to the B1353 at Aldrington, noting that this is shown going through the centre of Leiston. Grove Road north of Friston (2.8.7.4) is not considered by the County Council as suitable for any construction traffic. In addition to the junctions listed in 2.8.6.4 the County Council would consider that the A1094 /B1069 / C 247 Sternfield Road crossroads adjacent to Snape Church should be included as the SZC Transport Assessment noted that this was close to capacity in the peak year and concerns have been raised locally about road safety, particularly traffic exiting from the side roads into gaps in the traffic on the A1094. For clarity, the B1121 between the A12 at Sternfield and Friston (2.8.7.5) is subject to speed limits varying from 30mph to derestricted.
- 8.36 The baseline traffic data listed in table 2.8.18 relies on DFT traffic counts are extrapolated for years between actual surveys and is dated (i.e. 2009). It is presumed the further surveys will be undertaken to show the current traffic flows and fill, in any gaps in coverage. Whilst using growth factors such as those in table 2.8.19 may be acceptable at this stage it would not be for the Transport Assessment / Environmental Statement.
- 8.37 Further explanation is necessary regarding the data presented in Table 2.0.24 such as a more accurate description of the links (e.g. A12 (south of A104 junction), how far does this extend? The national averages in terms of collisions also require explanation particularly the selection of 'urban roads' and 'all roads other roads.' Both have high averages which appear to be related to roads within major built up areas as opposed to these roads which are part urban in minor settlements but predominately albeit sometimes with speed restrictions. the County Council would dispute the claims in 2.8.7.22 that the roads are less sensitive to changes in traffic. the County Council is concerned that the number of collisions on the B1119 between the B1121 at Saxmundham and the junction to Grove Road in Knodishall has been under-estimated. There appear to be 3 slight injury crashes in Saxmundham, three more at or near the Give Road junction and another two slight and one severe injury related collision between, a total of nine.
- 8.38 In addition to bus routes referred to in 2.8.7.25 and 26 the applicant should be aware that there is a significant bus network for transporting school children in this rural area. Such routes are sensitive to road closures.

8.39 It is unclear if the permanent access routes are considered as embedded mitigation (2.8.8.2) in Volume 2, Part 1, Appendix 1.4.B, Outline Construction Traffic Management Plan (Suffolk Onshore Scheme) or Volume 2, Part 1, Appendix 1.4.F, Outline Schedule of Environmental Commitment and Mitigation Measures. Although referred to in 1.4.B.6.5 in the former it is unclear if this is as mitigation or as a practical measure to gain access?

#### **Appendix 2.8.B Receptor Sensitivity Levels**

8.40 Due to high levels of workload the County Council associated with examination and delivery of DCOs have been unable to review the information available to meet the deadline for response.

#### **Appendix 2.8.C Baseline Traffic Flows**

8.41 the County Council notes that the date of the historical data falls between 2009 and 2019 and is dated. Extrapolation from these dates to 2023 introduces uncertainty and additional surveys should be undertaken prior to the application.

#### **Appendix 2.8.D Preliminary Highway Impact**

8.42 Due to high levels of workload the County Council associated with examination and delivery of DCOs have been unable to review the information available to meet the deadline for response. It is unclear how the development traffic flows have been derived.

#### **Appendix 3.8.E Magnitude of Impact**

8.43 Due to high levels of workload the County Council associated with examination and delivery of DCOs have been unable to review the information available to meet the deadline for response.

#### **Appendix 2.8.F Preliminary Assessment**

8.44 Due to high levels of workload the County Council associated with examination and delivery of DCOs have been unable to review the information available to meet the deadline for response.

### **Chapter 14 Suffolk Onshore Scheme Inter-Project Cumulative Effects**

8.45 With reference to Table 2.14.6 Seven Hills FMF. The FMF will still be operational in 2029, indeed approaching its peak use as the Sizewell C project reaches its peak in terms of HGV deliveries. Similarly, Table 2.14.8 Northern Park and Ride and table 2.14.9 Southern Park and Ride will both be operating close to or at their peak capacity as the SZC workforce reaches its maximum.

8.46 Tables 2.14.11 and 12 SPR EA1(N) and EA2 are expected to commence in the next few years but a date has not been confirmed. There remains a risk that some overlap in transport impacts may occur if the schemes are delivered sequentially over 5 years, particularly as transport peaks are expected at the end of the construction phase as the haul roads and site compounds are removed.

8.47 Table 2.14.17 Brightwell Lakes. The site access on the A12 is completed but the improvements at the Foxhall Roundabout are conditioned against a quantity of dwellings that can be occupied. There is uncertainty when this will be realised and hence when the highway improvements will be completed. Note that some of the other off site highway improvements will be incorporated in the A12 MRN scheme.

8.48 Table 2.14.45 the County Council does not recognise the traffic flows presented in this table as they appear to underrepresent the movements associated with the Sizewell C development. Table 8.7: 2028 peak construction – forecast daily (24-hour) AAWT traffic flows in <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010012/EN010012-005601-The%20Sizewell%20C%20Project%20-%20Consolidated%20Transport%20Assessment.pdf> shows greater traffic movements associated with SZC peak year.

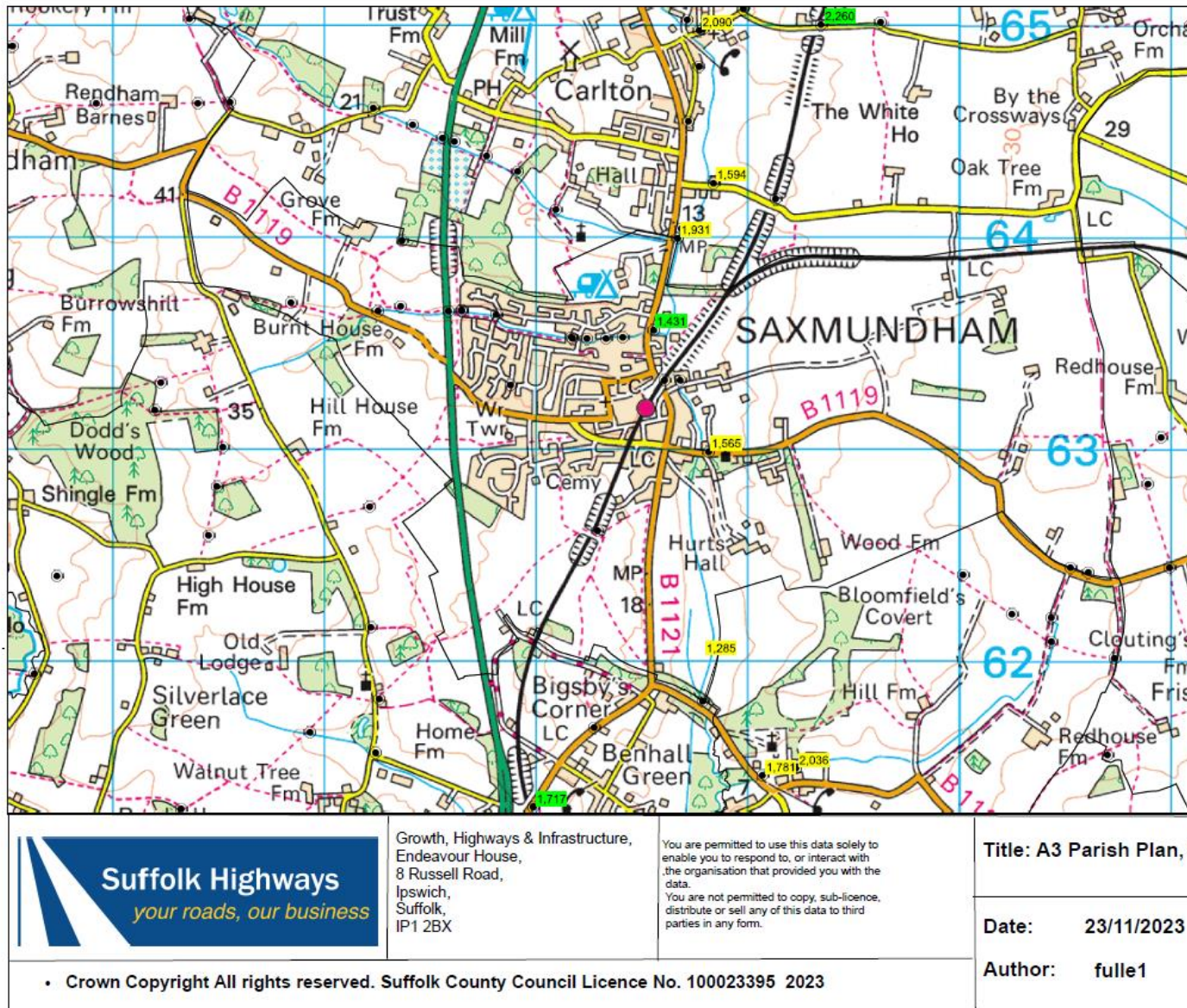
### Structural Capacity of Bridges

8.49 In its capacity as Local Highway Authority SCC regularly reviews weight restrictions on bridges it maintains. Following a review of structures in the Saxmundham area there have been a number of changes that are detailed below. SCC would encourage discussions with any developers with regard to these restrictions.

Unit No.	Location	Weight Restriction
1285	BENHALL BRIDGE	STGO1
1431	NORTHEND CULVERT	STGO3
1565	CHURCH BRIDGE	STGO2
1594	CARLTON ROOKERY	STGO1
1717	BENHALL RAILWAY	STGO2
1781	STERNFIELD CULVERT	STGO3
1931	CARLTON CULVERT	STGO1
2036	GLEBE FARM	C&U
2090	BRIDGE ST.,KELSALE	STGO1
2260	KELSALE RAIL BRIDGE	7.5T

Restriction detail confirmed by Structural Review / Assessment. Strengthening or detailed Assessment required to change restriction

Capacity detail confirmed by Structural Review, Assessment required to change interim restriction



**Appendix 1.4.B Outline Construction Traffic Management Plan (Suffolk Onshore Scheme)**

8.50 Little mention is made of the A12 which would form the main access road between the project and the SRN, noting that the A12 north of Seven Hills is maintained by the County Council and is not part of the SRN (1.4.B.2.6). Whilst the SZC highway improvements will aid congestion at those specific locations on the A12 (1.4.B.3.2) other locations remain of concern to the County Council. Funding has been secured to develop a scheme to improve the A12 between Seven Hills and the A12/A1152 junction north of Woodbridge but this itself will not resolve all areas where congestion or road safety may be of concern.

- 8.51 Table 1.4.B.1 indicates that workers will arrive between 0700-0800 and leave between 1800-1900, presumably to avoid the network peak. the County Council notes that all NSIPs are applying this approach and there is a significant risk that in combination this will result in the peak being displaced to the shift hours. In any case, the County Council notes that this shift pattern and hence workers movement is not secured in the CTMP.
- 8.52 The length given in 1.4.B.5.27 for AILS but not weight. A feasible AIL route will need to be provided in terms of dimensions (width, length, height) and weight.
- 8.53 Some of the routes proposed in 1.4.B.6.3 are not considered appropriate by the County Council for significant volumes of construction traffic. Section 1 (Thorpe Road), Section 3 (B1353 Aldringham Lane, B1122 Aldeburgh Road), Section 8 (B1121 Aldeburgh Road), Section 9 (Grove Road), Section 9 (B1121 Church Hill, The Street), Section 12 (B1121 and B1119 from A12 through Saxmundham), Section 14 (B1119 and Mill Road Saxmundham) are all of concern due to their evolved nature, narrow width, and frequent bends. Details on many have been provided in the LIR for SPR EA1(N), EA2 and SZC. It is unclear which road Section 13 refers to as the B1110 is not a road in Suffolk.
- 8.54 The County Council notes there is an intention to use the B1122 Leiston Road to access the construction site north of Aldeburgh. The geometry at the A1094 / B1122 Roundabout was matter discussed in detail at the EA1(N) and EA2 examination where it was considered that use by articulated vehicles was a significant concern. The B1353 Aldringham Lane also has constrained geometry and is narrow for a B road.
- 8.55 The SPR EA1(N) and EA2 projects judged that the B1121 through Friston was inappropriate for use by construction vehicles and proposed access to the substation and converter stations were to be accessed via a haul road from the B1069 south of Knodishall. The applicant does not appear to be following this approach (1.4.B.5.26) which is of concern to the County Council. Similarly, the County Council argued in the SPR that the B1119 between Saxmundham and Leiston is also unsuitable for construction traffic but is proposed for use by NG (1.4.B.5.32 and 33).
- 8.56 The County Council welcomes the proposal to provide permeant access roads to the substation and convertor stations as we consider this is an acknowledgement of the challenging access to the convertor and substation sites via the local road network. Prior to commenting further, the authority would need more information to consider the impact of such permanent access routes and any legacy or other positive impacts associated with a well-considered route. Where field accesses are considered as permanent (1.4.B.6.6) due attention must be made to provide suitable visibility at junctions with the local road network.



- 8.57 The County Council acknowledges the use of DMRB for determining visibility splays for access roads (1.4.B.6.23). Many of the proposed access are on derestricted roads and therefore a y distance of 215m appropriate although only 120m is shown on the drawings in Annex A. Even a visibility splay of 120m will require significant removal of vegetation and the impacts of this should be included within the ES. Of concern are comments within drawing SEAL-MMD-SEAL-ENG-DWG-0356 that it may be difficult to achieve the visibility required by DMRB. This echoes our concerns that without highway boundary and topographic data it is unclear if the necessary visibility can be delivered within the order limits.
- 8.58 We would refer NG to Appendix F of Suffolk Design for the County Council's visibility guidance <https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf>
- 8.59 Vehicle swept paths are dependent on the existing road layout not just a generic bell mouth design and need to be treated with caution if being proposed to show that access layouts are feasible.
- 8.60 Trenchless crossings are preferred to trenched crossing of the public highway (1.4.B.6.27) to reduce disruption to road users and damage to the fabric of the highway. Where road widths are less than 7.4m is not usually feasible to trench across a road under two-way traffic control due to the required safety clearances.
- 8.61 During the SPR examination all parties were advised that Network Rail had placed a 100-tonne weight limit on the rail bridge on the A104 at Farnham (Table 1.4.B.12).
- 8.62 No details have been provided with regard to the extent of the highway improvements proposed at the A1094/B1121 junction at Friston (1.4.B.7.6), presumably these will be to allow turning from the A1094 eastbound to the B1121 northbound and vice versa. It is unclear what junction is referenced as the A1096/ Snape Road, but it may reflect the authorities concerns regarding the safety and capacity of the A1094/B1069 junction adjacent to Snape Church.
- 8.63 The County Council welcomes the draft management and control measures but notes that these measures will need to quantify and secure a number of key elements such as maximum HGV movements to ensure that the impacts assessed in the TA and ES are not exceeded. Regarding workers movements, if reliance is placed on shift patterns to avoid workers or visitors travelling in the network peak (1.4.B.7.38) this should be secured within the management plans.
- 8.64 In terms of enforcement, it is unclear what actions will be taken to ensure compliance (1.4.B.8.5).

## Highways Non-Statutory Consultation Response

### Availability of Information

8.65 NGET 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:  
<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/the-sizewell-c-project/>
- East Anglia One North Offshore Windfarm  
<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/>
- East Anglia Two Offshore Windfarm  
<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/>

8.66 A large amount of information and data is available from these projects, and this should be considered as part of the development of the NGET proposals. We would recommend that there is close collaboration between NGET, SPR, Sizewell C Co., East Suffolk Council and Suffolk County Council. 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 Sea Link.

8.67 As set out in the consultation documentation, NGET are also aware of proposals associated with the LionLink HVDC project and have considered options for a coordinated approach to the sites. NGET 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.

8.68 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 The County Council to comment is limited and so The County Council's position on impacts at locations may be subject to change.

## **General Comments**

### **Assessment Methodology**

- 8.69 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 NGET 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 we consider 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 with a constrained geographical area.
- 8.70 Consideration 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 The County Council, including categorisation of links and magnitude of impacts. Consideration should also be given to the scope of the assessed network as part of the East Anglia Projects.
- 8.71 As part of any submission, a Transport Assessment and a separate Environmental Assessment of road traffic should be submitted. We consider that early consultation with the Local Highway Authority to determine the scope of such an assessment will be of benefit to the Applicant.
- 8.72 Discussions will be needed over issues around traffic forecasting and the reliability of current traffic data due to Pandemic and Post Pandemic traffic volumes.
- 8.73 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.

### **Work Force**

- 8.74 NGET 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.



- 8.75 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.
- 8.76 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**

- 8.77 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 NGET should be mindful of this when considering the structure and implementation of plans, or for example if pre-commencement works should have separate management plans, as in EA1(N).

### **Reducing Disruption**

- 8.78 NGET 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 the highway network needs to be fully considered, including where appropriate the use of a haul route along the corridor.
- 8.79 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 these with other developers so that cumulative impacts are minimised.

## Traffic Impacts

8.80 The County Council will need to understand impacts associated with all traffic during construction, operation, maintenance, and decommissioning, including freight and workforce movements, and the profile of traffic movements. In accordance with national planning guidance consideration must be given to achieving as sustainable a transport strategy as possible.

8.81 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.

8.82 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 used 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).

- 8.83 Location of the onshore elements within an area poorly served by public transport and limited pedestrian and cycle infrastructure.
- 8.84 The list above should not be treated as being a definitive list of the authority's concerns as these may change as more details of the project are made available.
- 8.85 National Highways opinion should be sought regarding potential impacts on the Strategic Road Network.

### **Access Arrangements**

- 8.86 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.
- 8.87 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 Indivisible Loads (AIL)**

- 8.88 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.

- 8.89 As part of the East Anglia One (North) an assessment of the local AIL routes was undertaken, and this should be considered by NGET, along with the work required to understand any structural improvements that are necessary along the corridor.
- 8.90 In previous NSIPs, The County Council has highlighted the lack of coordination at all levels to provide and secure suitable permanent 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 The County Council consider it is not unreasonable for such infrastructure to be provided to support the industry.
- 8.91 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**

8.92 The Applicant must provide clear definitions of the following:

- 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).

8.93 Such terms should be used consistently in all documents and reflect relevant controls within the management plans.

### **Net Gains on Public Rights of Way**

8.94 Significant discussions will be needed with the County Council PRoW team to minimise disruption and to identify relevant enhancements to the network.

8.95 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 created in tandem with biodiversity enhancements.

### **Maintenance**

8.96 The County Council 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.

8.97 It is expected that an agreement will be reached that will allow The County Council to recover reasonable costs including but not limited to:

8.98 Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway.

- 8.99 Visual and structural condition surveys of the highway and contributions towards structural repairs.
- 8.100 Surveys and assessment of highway structures to facilitate AIL movements.
- 8.101 Damage to the Highway (in accordance with the provisions of Section 59 Highways Act 1980).
- 8.102 Creation of temporary traffic regulation orders (including The County Council consultation and issue of permits).
- 8.103 Relocating / removing street furniture and all other highway infrastructure to facilitate AIL movements.
- 8.104 Technical approval and inspection of highway accesses and cable crossings as detailed in the approved construction traffic management plan; and
- 8.105 Review of submitted materials for monitoring the final management plans.
- 8.106 Agreements with Local Highway Authorities
- 8.107 The County Council 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.
- 8.108 Discharge of requirements relating to highways, including PRow should be discharged by the LHA after consultation with the LPA.

### **Regional Access**

- 8.109 The main regional access route is the A12. The County Council 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).
- 8.110 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.

8.111 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.

### **Converter Station**

8.112 The B1119 provides the only existing access to this convertor station. For access from the west all traffic would have to pass through Saxmundham and from the east through Leiston. Both have significant geometric constraints besides the impacts of construction traffic on the community. The B1119 between the towns has several sharp bends and occasional narrow pinch points making it unsuitable for construction traffic, again a matter discussed and agreed in recent DCOs.

8.113 Whilst access via a haul road may be possible this can only realistically be from the A12 or B1122 (or Sizewell Link Road if constructed). The latter however would require significantly longer journeys to reach the site. The River Fromus Valley, East Suffolk Line (and potentially weight limits on the B1121 bridge over it) and Leiston Branch Line are constraints to the north, west and south. Access from the west would require a temporary bridge over the River Fromus. The use of the A12/B1121 junction at Benhall would be of concern to The County Council in terms of road safety with large vehicles turning across a dual carriageway, albeit one limited to 50mph speed limit.

8.114 It is noted that when selecting sites, the Applicant has committed to considering the traffic and access opportunities, nature of adjacent roads and avoiding settlements, residential properties or

### **Co-ordination with other projects**

8.115 The County Council would strongly support co-location of landfalls, cable corridors and convertor station sites provided that suitable transport access can be provided during the construction and operational phases. Where possible this should also take advantage of transport improvements proposed for consented applications in the area.

8.116 The proposed new access road from the B1122 / Eastbridge Road junction eastwards to Goose Hill could potentially form a corridor linking the S5 landfall to the converter site 3 alternative (option 2) although it is realised that there would be significant difficulties co-ordinating this proposal if delivered during construction of Sizewell C. It would however remove the cable corridor from the SSSI and environmental mitigation areas either side of Lovers Lane.

### **Landfall Specific Comments**

- 8.117 In the absence of a haul road, the landfall area can only be accessed from a narrow C road passing through parts of Aldeburgh or Thorpeness. This minor road although straight is narrow and used by significant numbers of cyclists.
- 8.118 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.
- 8.119 Thorpeness is a tourist destination and in holidays there is significant on-street parking reducing the road to a single lane width. As footways are limited pedestrians frequently use the road.
- 8.120 Access to the B1121 from the south through Aldeburgh is difficult for large vehicles, a matter explored in detail during the SPR EA1(N) examination. To access the B1121 from the north though Leiston has similar issues of narrow widths and restrictive junction layouts.
- 8.121 It is envisaged that the traffic impacts on the A1094 through Aldeburgh would be reduced compared to S1; however, there would be increased impacts along B1121 Leiston Road, including turning movements at the A1094 / B1121 roundabout; which due to the roundabout geometries and on-street parking presented challenges during the development of EA1 North traffic management.

### **HVDC Cable Corridor Specific Comments**

- 8.122 Blue and Purple Corridor (S3 or S4 landfall - Thorpeness/ Sizewell –North of Leiston)
- 8.123 To the north of Leiston there is greater opportunity for use of the B1122 and/or Sizewell Link Road and Lovers Lane / Sizewell Gap. It is noted in fig 9-2 that the order limits for the Sizewell Link Road are not shown and therefore any potential links between cable corridors and conversion stations to the new road.
- 8.124 The highway network around Eastbridge, including Eastbridge Road consists of narrow, bendy roads which form important pedestrian and cycle connections. Thus, they are not suitable for construction traffic.
- 8.125 The corridor appears to interact with land that is proposed for the Sizewell C 'Green Rail Route and the protected sites of Aldhurst Farm and the SSSI east of Lovers Lane. Depending on the delivery of the corridor this is likely to cause significant disruption to the materials strategy for Sizewell C proposals and we would recommend discussions are had with Sizewell C Co. at as early a date as possible over this. The Council would oppose impacts that affect the materials strategy for Sizewell C, particularly those that result in large increases in HGV movements on the local highway network due to the absence of the rail route. Additional concerns would also occur for where the route crosses over the B1122, Lover's Lane and Sizewell Gap and the resulting impacts on other consented NSIPs.

## Summary

- 8.126 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.
- 8.127 Transport access to landfalls with the exception of S3 and S4 is poor.
- 8.128 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.
- 8.129 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. It is noted that even if mitigation is proposed there are limitations on delivering this within existing highway limits.
- 8.130 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.
- 8.131 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.
- 8.132 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.
- 8.133 As the emerging preferences for site 1 and 3 include corridor routes south of Leiston, The County Council would express significant concern regarding access from the local highway network based due to the issues discussed above.
- 8.134 Of the alternate routes site 1 alternative and site 3 alternative (option 2) could gain access at their eastern extremities near Sizewell but again rely on the poor highway network to the south of Leiston. Site 3 alternative (option 1) is the proposal best served by the existing highway network and likely to benefit most from the Sizewell C improvements if these are delivered.

## 9 Landscape

- 9.1 The County Council recognises the Climate Change Emergency and generally supports the provision of renewable energy infrastructure including, in principle, the use of Multi-Purpose Interconnectors, converter stations and other shared/combined infrastructure where suitable.



- 9.2 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 other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment.
- 9.3 Based on the information provided by the applicant and two site visits to the general area during the Non-Statutory Consultation process (on 17/06/2022 and 10/11/2022), I offer the following comments without prejudice to any further comments I or any other Suffolk County Council Officer may wish to make, as further detailed information with regards to the project becomes available.

### **Suffolk Onshore Scheme**

- 9.4 From the 5 landfall search areas and 7 converter station site search areas identified for Suffolk within the Non-statutory Consultation Documents, the Applicant has developed the proposals presented in the Statutory Consultation as the Suffolk Onshore Scheme. These comprise:
- Proposed Friston 400kV substation and associated overhead line modifications or a connection into and works within the proposed Friston substation.
  - A connection from the existing transmission network via the proposed Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If the proposed Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed by the Proposed Project.
  - A high voltage alternating current (HVAC) underground cable of approximately 1.7 km in length between the proposed Friston Substation and a proposed converter station (below).
  - A 2 GW high voltage direct current (HVDC) converter station up to 26 m high plus external equipment (such as lightning protection & railings for walkways) near Saxmundham.
  - A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900m inshore from a landfall point where the cable transitions from onshore to offshore technology; and
  - A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

### **Context**

- 9.5 The County Council welcomes the choices of the location for the landfall site, converter station site and for the cable corridor, as this combination does provide the opportunity to coordinate, co-locate and consolidate infrastructure, both the Applicant's own and other promoters' projects.
- 9.6 Notwithstanding this, the proposals are located in highly constrained landscapes and the application of Good Design principles (see Appendix 1 of this letter) as well as the full Mitigation Hierarchy (including compensation for adverse effects that cannot be mitigated) will be essential.

*Landfall option between Thorpeness & Aldeburgh*

- 9.7 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, the site 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.

*Converter Station Site at Saxmundham*

- 9.8 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 require diversion (see Figure 1.4.5).
- 9.9 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. The current landscape is generally open, and a converter station would be prominent from the B1119. Whilst the provisional Agricultural land classification is slightly better than on alternative sites, the loss of landscape features would be minimal, and the potential for Green Infrastructure benefits and Biodiversity Net Gain would be greater.

*Cable corridor*

- 9.10 The emerging preference for a cable route begins within the Heritage Coast, Essex and 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.

**Landscape Strategy**

- 9.11 The County Council considers that a clear vision for landscape for the whole project, and in particular for the converter station site will need to be developed for the ES.
- 9.12 The Saxmundham Converter Station Indicative Landscaping Strategy with Co-location (Figure 1.4.6) and the design principles for the landscape strategy (PEIR Volume: 1 Part 2 Suffolk Onshore Scheme, Chapter 2 Landscape and Visual, pages 74 and 75) are welcome, but will need to be augmented to reflect the requirements for ecology (habitat connectivity, Biodiversity Net gain) and recreation and public amenity (PRoW), as well as reflecting potential archaeological constraints.

- 9.13 |The County Council considers it essential for any landscape strategy for the converter station site at Saxmundham to not only allow for, but proactively plan for successful co-location with other infrastructure projects on this site. It would be important that the functionality and appearance of the site (in terms of landscape, visual amenity, Biodiversity Net Gain, and recreation) works equally well, whether or not the other two converter stations materialise.
- 9.14 The County Council considers that a landscape masterplan should be developed for the whole site with a focus to minimise the harm to landscape and visual amenity resulting from this project and potential further converter stations, by seeking integration into the landscape through embedded mitigation such as using landform and landscape-led cut and fill, as well through mitigation in form of screen planting at a landscape scale.
- 9.15 The surface water drainage strategy and permanent access option should be an integral part within the landscape masterplan and enable a creative and landscape-led approach to the required water attenuation, management, and access.
- 9.16 The opportunities for recreation should be further developed. The loss of footpath connections will need to be addressed and assessed in visual terms; additional opportunities for recreation should be developed through pro-active community engagement. It is noted that the existing footpath connecting from the centre of the Converter station site southwards, appears to be missing from the Landscape Strategy.

## **Landscape and Visual Assessment**

### *Methodology*

- 9.17 The assessment methodology could be more detailed, in particular regarding the derivation of visual sensitivity. It is, for example, not clear why some PRoW are considered to be of medium rather than high sensitivity.
- 9.18 While it is appreciated that the threshold for considering an effect as significant includes moderate effects, The County Council considers that the bar for falling into this bracket is set too high. Slight minor adverse effects should result in no more than a small part of characteristic features to be lost. Where characteristic features are partially lost moderate adverse landscape effects may already occur.
- 9.19 Referring to paragraph 2.2.5.33, the County Council considers that the effects above the cable routes should also be assessed for year 15 and not be scoped out in the ES. Likewise, operational effects for the land fall should also be scoped in.
- 9.20 The Photomontage Methodology (Appendix 2.2.A) is broadly acceptable.

### *Landscape and Visual Baseline*

#### District LCA Summary of description in published study relevant to the study area

- D4 Thorpeness to Aldeburgh (and other landscape character areas, such as J4 and K3); Although not strictly a landscape issue, but clearly linked, it may be worth mentioning that this area as a hotspot for tourism and recreation, rather than simply pointing out that there are opportunities for recreation.

## Visual Baseline

### *Viewpoints*

9.21 The proposals cover a considerable geographical area, and the County Council is concerned that 18 viewpoints may not be sufficient to convey the potential impacts and adverse effects on landscape and amenity. the County Council considers that an additional viewpoint should be provided from the PRow passing Wardspring Farm to the north-east of the Converter Station site.

9.22 Further, it is considered that the permanent access options must be fully assessed, as they will have their own landscape and visual impacts and effects. In due course visualisations will need to be provided for the diverted PRow.

- The OHL mentioned in the baseline description for value do not seem visible in the viewpoint photographs for VP3 nor in VP4. Neither are there annotations in this respect.
- The descriptions for the multi-directional VP6 are not clear enough with regards to the direction of view that is being described.
- the County Council queries the attachment of value to views 14, 15 and 16. In view 14 there few detracting features (except for the Water tower) and the only justification for not giving a very high values to this view, may be that it is outside the AONB. It is however from within a Park and Garden of Historic or Landscape interest. Similarly, Views 15 and 16 are largely intact views, the railway line being well integrated into the landscape and the OHL at a distance that reduces their adverse effects. These views should be awarded a high value.
- In View 17 the wood pole line referred to in the description is not visible in the photograph and the view of the OHL is filtered by a wooded landscape and at a distance that reduce its visual effects. View 17 should be awarded high value.

### *Visualisations*

9.23 The Viewpoint photograph sheets contain useful technical details and are provide some annotations, which are, however, mostly generic. It would be helpful, if annotations would aid orientation, for example by naming landmarks and other built structures and indicating locations and names of roads, PRowS, and woodlands/plantations.

- 9.24 The County Council would welcome it if the viewpoint title could be much more prominent on the page. There should also be a location map that references the viewpoint and the direction it is looking in at the bottom of the page.
- 9.25 There are currently no visualisations for year 15, which are expected to be provided in the ES.
- 9.26 The visualisations provided are useful as a first indication as to where visual mitigation will be required.
- 9.27 The LVIA is both a technical and a public facing document and one of its purposes is to communicate the visual impacts and effects during construction and operation to the public. In absence of a viewpoint at the landfall site and in addition to viewpoint analysis and assessment around the converter station site, the County Council considers that supporting material, such as photographs of existing projects and explanatory text, should be provided for joint bays, transition bays and the construction of converter stations to illustrate anticipated and potential effects.

### *Mitigation*

- 9.28 While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Mitigation Hierarchy will need to be applied in full, including compensation for impacts that result in adverse landscape and visual effects that cannot be avoided or mitigated through embedded measures.
- 9.29 Strategic landscape proposals which include on- and off-site mitigation planting are expected to be required. These should be brought together in an Environmental Masterplan around the Saxmundham site, integrating the requirements for of landscape and visual amenity with those of ecology, heritage (archaeology and settings of Listed Buildings) and recreation (PRoW).
- 9.30 To aid mitigation of the proposals an Environmental Colour Assessment (ECA) should be considered, to inform the choice of colours used for the built structures of the scheme.
- 9.31 For any mitigation planting proposals, it will be essential to apply realistic expectations to annual growth rates.
- 9.32 The aftercare and maintenance periods will need to be adaptive and will vary with the type of planting.

### **Arboricultural and Hedgerow surveys**

- 9.33 The PEIR states that Arboricultural Impact Assessments and Hedgerow Surveys will be provided in the ES.
- 9.34 Please find some guidance on hedgerow surveys and trees in Appendix 3.

### **Control Documents**

#### *Outline Code of Construction Practice*

### Working Hours

9.35 the County Council considers that further detail is required to clearly define and justify the exceptions to the standard working hours proposed. It should also be clarified whether the proposed working hours include the hour either side of the working day for setting out and winding down.

### Community Engagement and Public Information

9.36 A Government Policy Paper [[Getting Great Britain building again: Speeding up infrastructure delivery - GOV.UK \(www.gov.uk\)](#)] states that ‘*Developers are required to consult local communities before finalising their application, and we see instances of good practice in this area. But the desire to lower the likelihood of legal challenge may drive a tick box approach, rather than the effective engagement needed to get projects right.*’ And further, that ‘*Effective engagement and consultation allow developers and communities to work together to create development proposals that deliver benefits locally and for the country.*’

9.37 The proposals for community engagement and public information are passive and reactive and do not provide any active engagement with the communities, such as regular updates via post and meetings or engagement with regards to community-led mitigation and landscape master planning, compensation, and wider community benefits.

9.38 The provisions of GG28 (notifications) should be reflected in the main text.

### Lighting and visual intrusion

9.39 The information provided by the Applicant does require further clarification, for example whether the inside lighting of cable jointing bays will at all be visible on the outside. A detailed Lighting Design Strategy will need to be agreed with the relevant planning authorities in due course.

### Clearance of Site on Completion

9.40 1.4.A.2.68 Removal of trees, tree groups and hedges should be minimised and avoided for temporary structures such as compounds. A five-year aftercare plan will not be sufficient for all types of planting. While this may be sufficient for hedgerow reinstatement, it will not be sufficient for trees, tree groups and woodland planting.

### Landscape and Ecological Management Plan (LEMP)

9.41 It is highly likely that the level of detail known at submission and examination stage will not be sufficient to produce a final Landscape and Ecological Management Plan (LEMP). the County Council considers that it would be more useful to produce an Outline LEMP, with detailed LEMPs being produced and discharged as requirements post consent.

### Landfall Installation

9.42 It should be clarified, for what period of time the 24-hour working will be required, and whether, together with associated noise, contingencies may be required to provide alternative accommodation for residents of the most affected receptors. It should be confirmed as early as possible that trenchless technology will be used, as this is considered to be essential to make the project acceptable.

### Control and Management Measures

9.43 Many of control and management measures contain vague language, which means that the measures are not secure. the County Council considers that ambiguities need to be clarified for the ES.

#### GG03

An Outline Construction and Environmental Management Plan (CEMP), an Outline Landscape and Ecological Management Plan (OLEMP) and an Outline Construction Traffic Management Plan (OCTMP) should be produced for the ES.

#### GG05

The abbreviation for the Environmental Clerk of Works should be EnvCoW to avoid confusion with an Ecological Clerk of Works (ECoW).

#### GG07

It should be clarified where aerial photographs would be considered sufficient. To support hedgerow survey and tree record, photographs need to be taken in the field.

#### GG08

Reinstatement will need to be agreed with relevant planning authorities.

#### GG09

Sensitive features: it should be stated, how the appropriate protective area will be established, i.e. which standards and recommendations will be used.

#### GG15-GG17

Root protection zones should be protected within these measures.

#### GG22

Lighting should be designed, positioned, and directed to minimise intrusion.

#### GG26

Decompaction of subsoil may still need to be required.

#### LV01

All reinstatement planting and mitigation planting must be agreed with the relevant Planning Authority.

#### LV02

The language is unacceptably vague. In particular, the wording '*where such [tree protection] measures do not hinder or prevent the use of the relevant working width for construction,*' is unacceptable.

In addition to works to 'high grade' trees, all works within Root Protection areas will require details of special methods of construction to be submitted and agreed with the relevant planning authority and supervision by a suitably qualified Arboriculturist.

### LV03

A five-year aftercare period will not be sufficient for all types of planting.

Other Control Documents are due to be provided in the ES, such as OCEMP and OLEMP and a Draft DCO.

### **Intra- and Inter-cumulative effects**

9.44 Any assessment of intra- and inter-cumulative effects with regards to landscape and visual sensitivity must consider that the receptors can move through the landscape (PRoW), that therefore sequential effects need to be assessed and that a series of non-significant effects can become significant in accumulation. The effects on the receptors are also not restricted to visual effects. Even, when the infrastructure is not seen, is the knowledge that the infrastructure is there (for example, behind screen planting) likely to affect how the landscape is perceived and valued.

#### *Intra- cumulative effects*

9.45 The preliminary assessment of intra-cumulative effects is broadly acceptable. the County Council will provide more detailed comments at a later stage when more detailed assessments are available.

#### *Inter-cumulative effects*

9.46 The preliminary assessment of inter-cumulative effects shows that there is some considerable potential for these types of effects. These will have to be examined in greater detail when further information of this and other proposals will be available. the County Council will provide more detailed comments then.



## Landscape Response Appendices

### Appendix 1 The importance of Good Design

The County Council notes that 4.6.5 of the emerging Draft Overarching National Policy Statement for Energy, EN-1 (March 2023), suggests that both the developer and the Secretary of State should consider taking independent professional advice on the design aspects of schemes.

Furthermore, the Council notes that in the National Infrastructure Strategy (November 2020) the government states its commitment to embedding good design in all infrastructure projects through: *“Requiring 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”*

the County Council considers there is the opportunity to achieve a coherent architectural and landscape design approach between all projects at a consolidated converter station site, and that this can be achieved at the proposed site near Saxmundham. Furthermore, this approach could be used to support the necessary modifications to the design and layout of the Friston site.

The Council 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.

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.

The Councils 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.

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.

**Appendix 2 Comments of specific viewpoints**

Comments on specific viewpoints

<b>Viewpoint</b>	<b>the County Council (Landscape) comment</b>
1	--
2	The effects of the potential access route are currently not reflected.
3	Please clarify the location of the isolated residential property shown in the view.
4	--
5	--
6	--
7	--
8	Please check that the viewing angle is correct on the viewpoint map (looking at the photo it would appear that the view is towards north-west rather than west)
9	Viewing angle and location of viewpoint does not seem to fully align with photomontage. Please check.
10	--
11	--
12	--
13	Here at least a wire frame of the landfall site should be considered.
14	--
15	--
16	--
17	--
18	It appears that the viewing angle does need adjustment to align with the photopage.

## Appendix 3 Guidance on Hedgerows and Trees

### *Hedgerows and Important Hedgerows*

It should be anchored in the ES and in the definitions of the DCO that “hedgerow” and “important hedgerow” have the meaning given in the Hedgerow Regulations 1997. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan.

No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP would be assessed and to agree replacements as part of the landscaping scheme.

The County Council considers that important hedgerows for the purposes of this scheme should include:

- Those meeting the Hedgerow Regulations, including the criteria for Archaeology, History, Wildlife and Landscape as listed in Schedule 1 of the Regulations.
- If bat surveys identify 20 or more passes by bats the hedgerow should be considered important as a bat corridor.
- All the hedgerows where one or more passes of a barbastelle have been recorded - due to the rarity of the species and margin for error in recording.
- Those that perform an important visual function.

Any required hedgerow removal will need to be compliant with the Wildlife and Countryside Act 1981 which restricts the timings of this in relation to nesting birds. Also, as hedges are an invaluable habitat resource the removal of hedges, if required, must have a degree of control, suitable assessment, and adequate mitigation, including that hedges can only be removed in accordance with any approved plans.

To enable full understanding and assessment of locations of important hedges, and areas, where either Horizontal Directional Drilling (HDD) needs to be undertaken, or offsetting of residual impacts needs to be agreed the County Council would ask the applicant to:

- Append a column which identifies, by reference to the hedgerow regulations, why hedgerows are considered important.
- Display the above hedges on a colour – coded map of an appropriate scale, distinguishing between the different criteria and include the additional hedgerows covered by points 2 (bat passes) and 3 (visual importance) above.
- Confirm that the hedgerows in the cable corridor have been assessed against all the criteria in the hedgerow regulations, regarding, for example the presence of other protected species (Part II 6 (3)) and proximity to rights of way (Part II 8).
- Provide photos of each of the hedgerows which fall within the definition of 1, 2 and 3 above as and in accordance with point C. This will provide a reference for the baseline.

- Confirm which hedgerows the applicant is proposing to HDD.
- Confirm how adverse impacts on hedgerows are minimised, for example by defining a minimum width for the cable corridor, when crossing hedges. This should be individual for each hedgerow (as circumstances may differ).

### *Trees*

The Arboricultural Impact Assessment, which should be included in the ES, should provide full Tree Surveys in accordance with BS 5837:2012 Trees in relation to design, demolition, and construction. These Tree Surveys should then be used to inform the detailed design stage and micro-siting of all works and required tree protection measures, such as protective fencing.

Ancient and veteran trees and ancient woodlands are considered irreplaceable habitats and landscape features and any impacts on these should be avoided.

Post Consent, no works should be allowed to commence until a full Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPAs in writing.

No article in the DCO should automatically authorise any works to any tree subject to a tree preservation order. Such works, if demonstrated to be unavoidable, should be agreed with the relevant LPA on a case-to-case basis so that appropriate compensation can be agreed and secured.

## 10 Lead Local Flood Authority

### Landfall & cable corridor

- 10.1 Given works at these locations are of a temporary nature, the County Council's focus is to ensure that surface water is adequately managed during the construction phase.
- 10.2 Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible.
- 10.3 Consideration should be given to the return period to which construction drainage is designed, ensuring that there is sufficient space available within the Order Limits to accommodate such drainage provision.
- 10.4 Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring there is adequate space available for any necessary mitigation within the Order Limits.
- 10.5 Design Drawings, Version A, S42\_S/TDD/SS/0010, 0013, 0014 & 0018 and others – Indicative sections do not show any methods for surface water drainage and would present a barrier to overland surface water flows, which could increase offsite flood risk.

### Converter station

- 10.6 Consideration should be given to the return period to which construction drainage is designed, ensuring that there is sufficient space available within the Order Limits to accommodate such drainage provision.
- 10.7 National mapping suggests that soils in this general area are Lowestoft Formation – Diamicton, this soil generally has poor properties for infiltration. We would encourage the applicant to explore opportunities for infiltration through compliant testing at their earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network.
- 10.8 The County Council LLFA encourage the principle of water re-use and would welcome further discussions with the project promoter on this topic. However, it is noted that General Arrangement Plan Version A, Section 2, Drawing number S42\_S/IGA/PS/0002 shows the proposed converter station discharging to a 'permanent attenuation pond', which in turn is shown to discharge within the Order Limits. The discharge location would appear to be a farm irrigation pond. This would not be a suitable location to discharge surface water as it cannot be guaranteed that it has capacity to receive flow when required. Whilst the option for some surface water to discharge to the farm irrigation pond could be retained, this should not be a primary outfall location.
- 10.9 General Arrangement Plan Version A, Section 2, Drawing number S42\_S/IGA/PS/0005 – Drawing denotes '*drainage connections works*', but it is not clear what this is referring to.

10.10 General Arrangement Plan Version A, Section 3, Drawing number S42\_S/IGA/SS/0008 – What confidence can be assigned to each of the proposed outfall locations? How have these been determined as suitable?

#### **Friston sub-station**

10.11 Consideration should be given to the return period to which construction drainage is designed, ensuring that there is sufficient space available within the Order Limits to accommodate such drainage provision.

10.12 General Arrangement Plan Version A, Section 2, Drawing number S42\_S/IGA/PS/0003

10.13 Proposed substation located over existing ordinary watercourse. Land Drainage Consent will be required for such works, and we would not accept the piping of this watercourse for such a long distance. Therefore, whilst not part of the DCO (unless the DCO seeks to disapply the Land Drainage Act 1991), the project promoter will need to give due thought to how this ordinary watercourse will be diverted as an open channel.

10.14 Proposed 'permanent infiltration pond' shown. Justification must be provided that such a feature can function as a standalone infiltration feature.

10.15 Proposed 'permanent infiltration pond' is also shown with a positive outfall to a nearby watercourse. However, this watercourse does not have onward connectivity and instead conveys water overland, down a farm track, until it enters the Main River in Friston. The Order Limits do not extend far enough south to provide a direct connection to the Main River in Friston.

10.16 It is unclear what arrangement the proposed infrastructure would take if it were installed in addition to proposals as part of the Scottish Power Renewables (SPR) DCO. For example, would the National Grid sub-station consented through SPR need to increase in size? If so, in what direction? Would this impact SPR proposed attenuation basins? Where would Sea Link SuDS be located?

#### **PEIR Volume 1, Part 2, Chapter 5**

10.17 Existing flood risk and Land Drainage – fails to acknowledge historic surface water flooding downstream in Friston. This should include reference to multiple Section 19 investigations by Suffolk County Council as Lead Local Flood Authority under the Flood & Water Management Act 2010. The County Council LLFA have also produced a Surface Water Management Plan (SWMP) for the Friston catchment, which is available to the project promoter (should they not already have it), to enable them to assess existing surface water flood risk in the Friston catchment.

10.18 2.5.8.2 – States that work is located in areas to avoid risk of flooding, but the proposed sub-station is located directly over an ordinary watercourse. A surface water flow path adjacent this watercourse has been identified as part of the SWMP developed by The County Council LLFA, which would directly impact the chosen site location.

**PEIR Volume 3, Part 2, Chapter 5 Figures – Figure 2.5.2**

10.19 Only high-risk surface water areas are shown in the legend. I assume this relates to the national mapping definition of high risk i.e. locations with >3.33% AEP. Why has only this risk level been used? The County Council LLFA recommend the use of the national mapping 'low risk' scenario as this is the most appropriate national scenario for the 1% + CC event. It is also worth noting that the 1% + CC event is included in the Friston SWMP.

**Construction compounds**

10.20 Adequate surface water drainage must be provided for construction compounds. At present no surface water drainage infrastructure, such as attenuation ponds, are shown for construction compounds, in the same way that they are shown for permanent infrastructure. The return period for construction compound drainage should also be stated.

**11 Minerals and Waste**

11.1 The County Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.

11.2 Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities. In general, there would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.

11.3 In terms of the underlying sand and gravel resources the majority of the proposed development is not irreversible and although during the operational lifetime of the proposal, which would likely extend beyond the lifetime of anybody alive today, extraction within parts the area occupied by the underground cables would not be possible. Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development where possible. Removal of the development following cessation of use should be required to restore access to mineral resources.

11.4 Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of: -

- a) Prevention
- b) Preparing for re-use
- c) Recycling
- d) Other recovery
- e) Disposal

## 12 Public Health

### Convertor Station Design

12.1 2.4.2, 2.4.3 and 2.4.4, page 6: The County Council welcomes the prospect of a green roof that has potential to boost local ecology. Though noting the technical challenges presented in construction, it will be important for the developer to evidence the overall benefits to ecology and carbon reduction outweigh the impacts brought about by complex construction methods including sourcing of materials.

### Part 2 Suffolk Onshore Scheme Chapter 12 Health and Wellbeing

12.2 2.12.7.45-47, Future baseline, page 45 – The applicant may wish to consider referencing the Suffolk in 20 years resource <https://www.suffolk.gov.uk/asset-library/suffolk-in-20-years-2023.pdf>

12.3 2.12.4.2, Guidance specific to the health and wellbeing assessment, Page 12 – The County Council note use of NHS Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment HIA Assessment Tool (2019) and question whether HUDU is the most appropriate HIA tool given Suffolk is a predominantly rural County (<https://www.healthysuffolk.org.uk/asset-library/APHRs/core20plus5-aphr-2022.pdf>, <https://www.healthysuffolk.org.uk/asset-library/APHRs/core20-evidence-base.pdf>)

12.4 2.12.9.6, Preliminary magnitude, Page 52 quotes '*On the basis of the above, and with the mitigation measures listed above in place, the magnitude of impact is assessed to be low.*' Mitigation measures are not listed in 2.12.9.6.

12.5 2.12.9.12, Employment and income, Page 66. The section does not account for impacts to the existing local economy, but only additional jobs relating to the scheme.

### Appendix 1.4.A Outline Code of Construction Practice

12.6 1.4.A.2.14A, Page 6, Community Engagement and Public Information:

12.7 With respect to communications and signage, The County Council recommend neurodiverse friendly methods are used wherever possible.

12.8 1.4.A.2.49, Page 11, Welfare: '*Welfare facilities will be kept clean and tidy.*' How will this be monitored? i.e. will the Contractor undertake daily inspections and complete monitoring forms to ensure welfare facilities are kept clean and tidy? Perhaps this could be included in 1.4.A.2.69



## Part 2 Suffolk Onshore Scheme Chapter 9 Air Quality

12.9 Page 3 states '*It should be noted that the PM2.5 objective is a target value and is not in the 2010 regulations as a legal requirement to be achieved by local authorities.* Please note the Environment Act 2021 established a legally binding duty on government to bring forward at least two new air quality targets in secondary legislation. This duty sits within the environmental target's framework outlined in the Environment Act (Part 1).

12.10 The air quality targets set under the Act are:

- Annual Mean Concentration Target ('concentration target') - a maximum concentration of 10µg/m<sup>3</sup> to be met across England by 2040
- Population Exposure Reduction Target ('exposure target') - a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

See [Development of the Environment Act Targets - Defra, UK](#) for more information.

12.11 The County Council also recommend taking account of the World Health Organisations guidelines on Air Quality available at <https://www.who.int/publications/i/item/9789240034228>

12.12 The County Council recommend more could be done to monitor and mitigate against PM2.5 implications deriving from the project. The data referred to in Part 2 Suffolk Onshore Scheme Chapter 9 Air Quality is from diffusion tubes which do not measure PM2.5 and both the construction traffic and dust from site will significantly increase levels. This is of particular concern as one of the 'receptors' mentioned in the document is a Primary School in 'close proximity' to one of the sites – children are more vulnerable to the effects of pollution and exposure in childhood can lead to life-long health conditions. The County Council recommend installation of live pollution sensors to accurately monitor levels of all pollutants not just NO<sub>2</sub>, particularly by the schools and residential developments identified.

## **13 Public Rights of Way (PRoW)**

### **Summary**

#### **Assessment of Effects**

13.1 The County Council disagrees with the current approach of dividing the consideration of the effects on PRoW and their users across several chapters, none of which consider the actual experience of the PRoW users. It also makes it unnecessarily difficult for consultees to engage with the process. The County Council requires PRoW to be considered as a separate theme considering the effect on the physical resource, the amenity value, and the quality of the user experience.

#### **Labelling of PRoW**

13.2 Is inconsistent, confusing, contradictory, and unacceptable. the County Council is very disappointed that the labelling has not followed the standard expected by the County Council as owner of this digital data.

#### **Robustness of information**

13.3 the County Council is concerned that the desk-based approach and the many assumptions being made in the various chapters that consider PRoW and their receptors, are not sufficiently robust or accurate and are therefore leading to inaccurate assessments of sensitivity, magnitude and ultimately underestimating the significance of the effect of the development.

#### **Assessment of effects**

13.4 the County Council is disappointed that Public Rights of Way & Recreation have not been considered as a separate topic in the PEIR. Dividing the effect of the development on PRoW and their users across several chapters, each with its own set of criteria for sensitivity and magnitude, results in individual assessments which do not reflect the importance of the local access network and the quality of the user experience and amenity value. The combined effects of all the aspects of the development, such as the severance and loss of the physical resource, construction traffic, noise, visual intrusion, and loss of tranquillity, all contribute to the quality of the user experience inherent in a recreational walk or ride.

13.5 This fragmented approach gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. A walker, cyclist or horse rider using a public right of way or on open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.

- 13.6 Therefore, the County Council's position remains that the impact on both the physical resource and the amenity value of the public rights of way and access network should be addressed as a separate theme within an Environmental Assessment. This should include both the effect on the physical resource from temporary or permanent closures and diversions, as well as the quality of user experience and amenity value.
- 13.7 the County Council welcomes that PRow have been taken forward to the stage 3 -Intra-project effects assessment but this should focus on more than just visual intrusion.

### **Labelling of PRow**

- 13.8 This is completely unsatisfactory and contradictory throughout all the PEIR documents and infuriating for consultees to attempt to know which PRow is being referred to. For example, Chapter 8, Traffic and Transport has listed each PRow in 2.8.66 with the correct label E-460/001/0 together with a shorter 4 number label (8622) and a third reference label (S-P25), but then proceeds to use the latter two in most other sections, before resorting solely to the third reference label in the preliminary assessment section. The PRow Figure 2.8.4 (plan of all PRow) only uses the 4 number reference. This point was raised in the County Council response to the Non-Statutory Consultation, and it is frustrating that it has been ignored.
- 13.9 Labelling of PRow should be consistent and standard across all documents and follow the same convention as depicted on the Definitive Map, the legal record for PRow. The applicant was advised of this correct convention when acquiring the digital data from the County Council. PRow are identified by the parish (which has a code) and the path number, for example E – 354/007/A is East/parish code (Knodishall=354)/path number =7A, i.e. Knodishall 7A. Currently a variety of labels are used in different chapters of the PEIR, some correct, some not, and it is confusing and impenetrable making consultation much more difficult for statutory bodies and the public. It is unacceptable to use any other label in the consultation documents without at least being accompanied by the correct Definitive Map label.

### **Local Planning Policy**

- 13.10 Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out the council's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "Seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils, and partnership working."

The council will expect enhancements to the network in addition to mitigation, compensation, and management strategies that will ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.

**Volume 2 Part 1 Appendix 1.4.A Outline Code of Construction Practice**

13.11 the County Council welcomes the commitment to produce a PRow Strategy as part of the CoCP and looks forward to working with the applicant on the development of the outline PRow Strategy prior to the DCO application.

**Control and management measures****GG07**

13.12 The general project commitment regarding pre-condition surveys (Table 1.4.A.2 Ref GG07) should explicitly include all PRow within the working areas, crossing points, haul routes and used as access roads and include any pre-construction/pre-commencement activities. Note that the County Council is the landowner as regards the surface of the public highway.

**TT03**

13.13 The County Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures such as controlled crossing points, traffic marshals and signage. If temporary closures are required, then the County Council expects the number and duration to be kept to a minimum with alternative routes provided and has included the principles it would expect to be followed in the Addendum: PRow Guidance.

**Terrestrial enabling works, access, and site preparation.**

13.14 An onshore preparation works /pre commencement management plan and accompanying figure should be produced that outlines any PRow affected by site preparation and early works, together with the management measures necessary to protect the PRow and public users. Note that Figure 1.4.19 describes traffic routes during construction and operation but no information provided for pre-construction activities.

13.15 the County Council notes that the proposed access tracks and working areas would be fenced with 1.2m high stock fencing with gates to maintain access to PRow. However, the County Council oppose the gating of PRow as an unnecessary barrier to some users of the network, particularly those with limited mobility and equestrians on bridleway. There should be a presumption against installing gates unless this could be justified to the County Council for a specific site. Any gate would need to comply with current BS 5709-2018.

**Volume 2 Part 1 Appendix 1.4.B Outline Construction Traffic Management Plan**

13.16 The PRoW which are impacted by this scheme have been identified and described through a high-level desktop review considering surfacing, signage, width, potential obstructions when referring to route quality. (Appendix 1.4B Outline CTMP 1.4.B.2.16). the County Council are very concerned that this is introducing false assumptions and significant errors at this early stage. For example, describing a public footpath as an alternative route for a public bridleway shows a lack of understanding of the different classes of user, namely equestrians and cyclists, which are legally entitled to use the bridleway compared to a footpath. Route E-460/001/0 (8622) is described as expected to be lightly used with limited alternative routes available, whereas in fact, this is the only public footpath from the northeast side of Saxmundham linking to the quiet lanes and public footpath network in Kelsale, is locally well used and there are no alternative routes available.

13.17 the County Council welcome the commitment to retaining access to all existing PRoW with a limited number of temporary diversions to be used. (Appendix 1.4B Outline CTMP 1.4.B.7.10)

**Mitigation Measures**

13.18 the County Council welcomes the opportunity to discuss the additional mitigation required for any of the permanent diversions of PRoW at the substation and converter sites. (E-354/006/0 (7975), E-491/005/0 (8903) and E-491/006/0 (8904). (Appendix 1.4B Outline CTMP 1.4.B.7.13)

13.19 the County Council welcomes working with the applicant regarding the outline PRoW Management Plan to identify the management and mitigation measures to be implemented to avoid any significant effect on PRoW during all phases of the project. the County Council asks that this should also include any onshore preparation/early works. (Appendix 1.4B Outline CTMP 1.4.B.7.14) and those PRoW used as construction accesses where additional highway related works are required such the construction of bell mouths. (S-BM 08, S-BM 013)

13.20 the County Council would welcome the opportunity to discuss the appropriate mitigation at the converter site to ensure the continuity of access from Saxmundham to Sternfield and Friston, on PRoW designed and integrated into the proposed landscaping strategy.

**Volume 1 Part 2 Chapter 2 Landscape and Visual**

13.21 the County Council welcomes the recognition that the effect on the visual amenity for users on the public footpath at viewpoint 1 is significant. PRoW at the converter station site are proposed to be permanently diverted (E-491/005 and E-491/006/0), and so this new route should be included as a representative viewpoint location.

13.22 The principle of connecting people to the environment via footpaths constructed in tandem with environmental enhancement is described in the draft NPS for Electricity Networks Infrastructure (EN-5). This principle should be applied to the design of the landscaping and the PRow network at the converter station and substation sites.

13.23 Therefore the County Council expects the Indicative Landscaping Strategy (Doc Ref Fig 1.4.3) to integrate PRow into the design with futureproofing for the possibility of co-location and not as currently indicated on the indicative landscape plan for the converter site. This shows the indicative recreational access route including the diverted PRow, located to the north of the new native woodland planting which would leave it exposed to the possible permanent access road to the north and also within the footprint of the co located converter station (Doc Ref Fig 1.4.6).

13.24 The public footpath E-491/005/0 is omitted from both these plans but is within the footprint of the proposed converter station and co-located station and the County Council will expect the mitigation, including the alternative route for the footpath, to be integrated into the landscaping.

### **Vol 1 Part 2 Chapter 8 Traffic & Transport**

13.25 the County Council is concerned that the desk-based approach and the many assumptions being made regarding the quality, level of use, availability of alternative routes for PRow users and non-motorised amenity are not robust or sufficiently accurate and are leading to the inaccurate assessment of the sensitivity of receptors and ultimately, the significance of the effect of the development.

For example, E-491/005/0 (S-P21/8903) lies directly under the footprint of the Saxmundham converter station and is the only direct off-road link from the village of Sternfield to Saxmundham yet is deemed to have low sensitivity as it is expected to be lightly used and alternative routes available. This leads to an overall conclusion of 'not significant.' However, it does not seem appropriate to assess the permanent closure of the footpaths at the Saxmundham site as 'not significant,' on the basis of having identified the need for further consultation to identify mitigation and the production of a management plan. Until those measures are identified and agreed, then the significance of effect of the development should remain as significant.

13.26 We do however welcome the recognition in 2.8.9.50 that there are potentially significant effects which will be reviewed as part of the ES, and we look forward to working with the applicant on identifying the appropriate mitigation as described in S-TTAM01 and S-TTAM02.

**Vol 1 Part 2 Chapter 11 Socioeconomics, Recreation and Tourism**

- 13.27 the County Council is disappointed that the effects considered under the heading of recreation focus solely on changed in journey length, local travel patterns and severance. It was expected that the assessment would consider the qualitative sensitivity of receptors and there was hope that this would ensure that the impact on the amenity value of the PRoW network would be adequately recognised. However, this does not seem to be the case, which is both disappointing and concerning that quality of user experience is not recognised as being inherent in a recreational context.
- 13.28 The assessment methodology has not in the County Council's opinion recognised the local importance of PRoW, some of which are the only off-road access for a community or are the main recreational space. the County Council are concerned about the robustness and accuracy of the assumptions being made, for example about the availability of alternative PRoW when allocating the level of sensitivity; it is wrong to suggest that there are alternative routes available when these alternative routes are also subject to the construction impacts or closure and diversion.
- 13.29 This particularly applies to the PRoW affected by the Saxmundham substation area E-491/005/0, E-491/006/0 and the Friston substation site, E-260/017/0 and E354/006/0. The converter station is proposed to be built over E-491/005/0 and if co -location occurs, also on E-491/006/0. There are no alternative off road routes linking Sternfield to Saxmundham and Saxmundham to Friston and until reasonable alternatives are confirmed, then the County Council consider that it is premature to suggest that the effect of the project is not significant.

**Vol1 Part 2 Chapter 13 Intra- Project Cumulative effects**

- 13.30 the County Council welcomes that PRoW have been taken forward to stage 3 -Intra-project effects assessment. However, the County Council considers that because of the assumptions made and the inaccuracies in describing the effects on PRoW as detailed above, the impact on the amenity and quality of the user experience should also be considered significant at this stage and not just the visual intrusion.

**Vol 1 part 2 Chapter 14 Inter-Project Cumulative effects**

- 13.31 The cumulative impact of this proposal with the other existing energy projects consented and proposed in this area is concerning. the County Council believe that there are inter-project effects that will impact on the PRoW network and its users from more than just visual intrusion, but the lack of the single assessment approach for public rights of way, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the East Anglia 1N and East Anglia 2 windfarms will impact on the PRoW network to the north of Friston where there will be repeated temporary closures of PRoW that could overlap with temporary closures on the same PRoW required for the Sealink project.



13.32 It is 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. 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.

13.33 the County Council expects the inter project cumulative effect assessment to specifically consider the impact on PRow and the amenity value of the PRow network in the vicinity of the proposed Friston substation and to provide mitigation, compensation, and management strategies to ensure that the quantity and quality of access provision is retained.

13.34 In addition, it should be noted that as part of the consented EA1N and EA2 windfarm, PRow E -354/006/0 will be permanently closed with a new PRow created to the east and north of the proposed substation site as shown on the approved DCO ROW Plans. This new PRow will cross the cable corridor and haul road to the east of crossing point S/PR/0044 and will need to be included for consideration by Sealink.

### **Addendum: PRow Guidance**

#### **Guidance for matters to be included a PRow Strategy or Management Plan**

- Early engagement with the County Council PRow & Access Team to discuss the impact on and management of the PRow & access network. Suffolk County Council 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 Suffolk County Council. 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 County Council digital data and labelled as per the Definitive Map and Suffolk County Council convention (Area -parish number - path number)
- Identifies where and how (i.e. physical disruption and impact on amenity) the project affects PRow in the pre commencement stages, construction, and operational phase.
- Identifies the wider access network and ensures continuity of the access network including links to U roads, quiet lanes and promoted routes by avoiding severance or sterilisation of an area through closures.
- Sets out the management measures for minimising disruption to the public and ensuring public safety during all stages of the project.

- The hierarchy for managing affected PRow should lead with the principle of keeping PRow open through use of signage and traffic management measures, followed by temporary closures with alternative routes provided for as short a duration as possible.
- Identifies the PRow proposed to be temporarily closed and/or management measures.
- Includes management measures for any shared construction access.
- Identifies any PRow to be permanently closed and the alternative route/s including the specification for new routes.
- Includes plans for restoration of all affected PRow – e.g. on access routes and crossing points.
- Includes a pre and post condition survey to be undertaken including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with Suffolk County Council (the County Council) as Highway Authority. This should include pre-construction work where PRow might be used to gain access to the corridor and reinforcement required prior to use by vehicles.
- Where impacted by the works, commitment to restoring any PRow to original condition or to a condition agreed with the County Council - where there are existing defects, the applicant should agree restoration measures with the County Council.
- Identifies any decommissioning work that will affect the access network and provides proposals for mitigation and restoration.
- Includes details and specifications for any improvement works or other mitigation measures that may be required as a result of the EIA.

### **Principles for the practical management of affected Public Rights of Way**

The Council expects the following principles to be followed: -

- Early engagement with the County Council PRow & Access Team to discuss the impact on and management of the PRow & access network. Suffolk County Council is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.
- 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 the County Council.

- Pre-construction works must not obstruct or disturb any public rights of way (e.g., new fencing, archaeology surveys etc) unless otherwise agreed with the County Council. Management measures or temporary closures not covered in the DCO must be by application to the County Council.
- 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 the County Council.
- Any temporary closure of a PRow must be agreed with the County Council 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 the County Council.
- The location of alternative routes to be agreed with the Council.
- 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 the County Council.
- 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.

#### **14 Socioeconomic**

- 14.1 It is expected that a large portion of additional jobs expected to be taken by those outside of the study area and a predicted leakage rate of 70%. Only 32 net additional jobs expected to be taken up residents, with reasoning given that jobs will be specialised construction. This leakage rate is unacceptable, particularly with the number of infrastructure projects in the local area, including those by the Applicant. The Council would expect that the Applicant works as a meta-project in order to reduce the leakage rate and maximise the number of jobs taken up by residents through investment in skills locally. A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the County Council would support a strategic approach to this.
- 14.2 We are pleased to see that the economic impacts on the Suffolk Onshore Scheme is considered relative to a 60-minute travel time from the Proposed Project boundary, utilising CIPD employee data. We would welcome clarification whether this is specific to the construction industry.

- 14.3 The 60-minute travel time area includes the main roads running through Bury St Edmunds, to the furthest point west. However, this excludes the majority of the settlement, including large sections of the eastern area, situated closer to the project. The Council would welcome revision of the study area to encompass the whole of Bury St Edmunds.
- 14.4 The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods.
- 14.5 Operational employment has been scoped out due to limited numbers. However, we believe that this should have been considered cumulatively alongside other projects in the region, as this will amplify any effects caused.

## **15 Other Issues**

- 15.1 Although a District responsibility, it is important to note there are several Listed Buildings located in the vicinity of the site including the Grade II Listed Wood Farmhouse and Hill Farmhouse. The development would potentially cause a detrimental impact to their setting.
- 15.2 Wood Farmhouse, which is adjacent to the proposed converter station site, was severely damaged by fire in April 2023, with its future uncertain. The County Council still considers it appropriate to consider the impact of the project on its setting, while its restoration is still a possibility.

## **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 and 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**

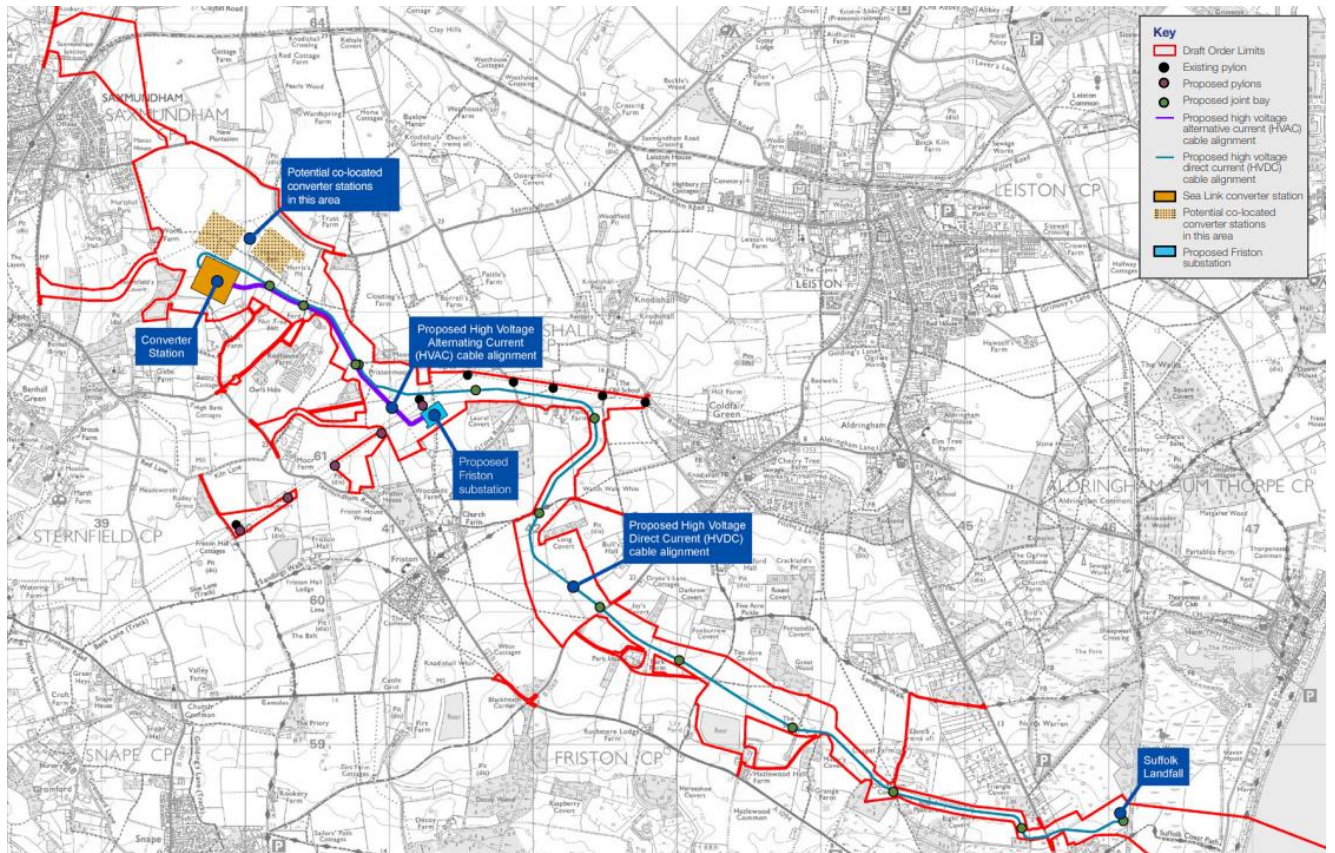
12. Cable corridors, associated haul routes and construction access, should avoid, or minimise temporary loss of trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife.

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

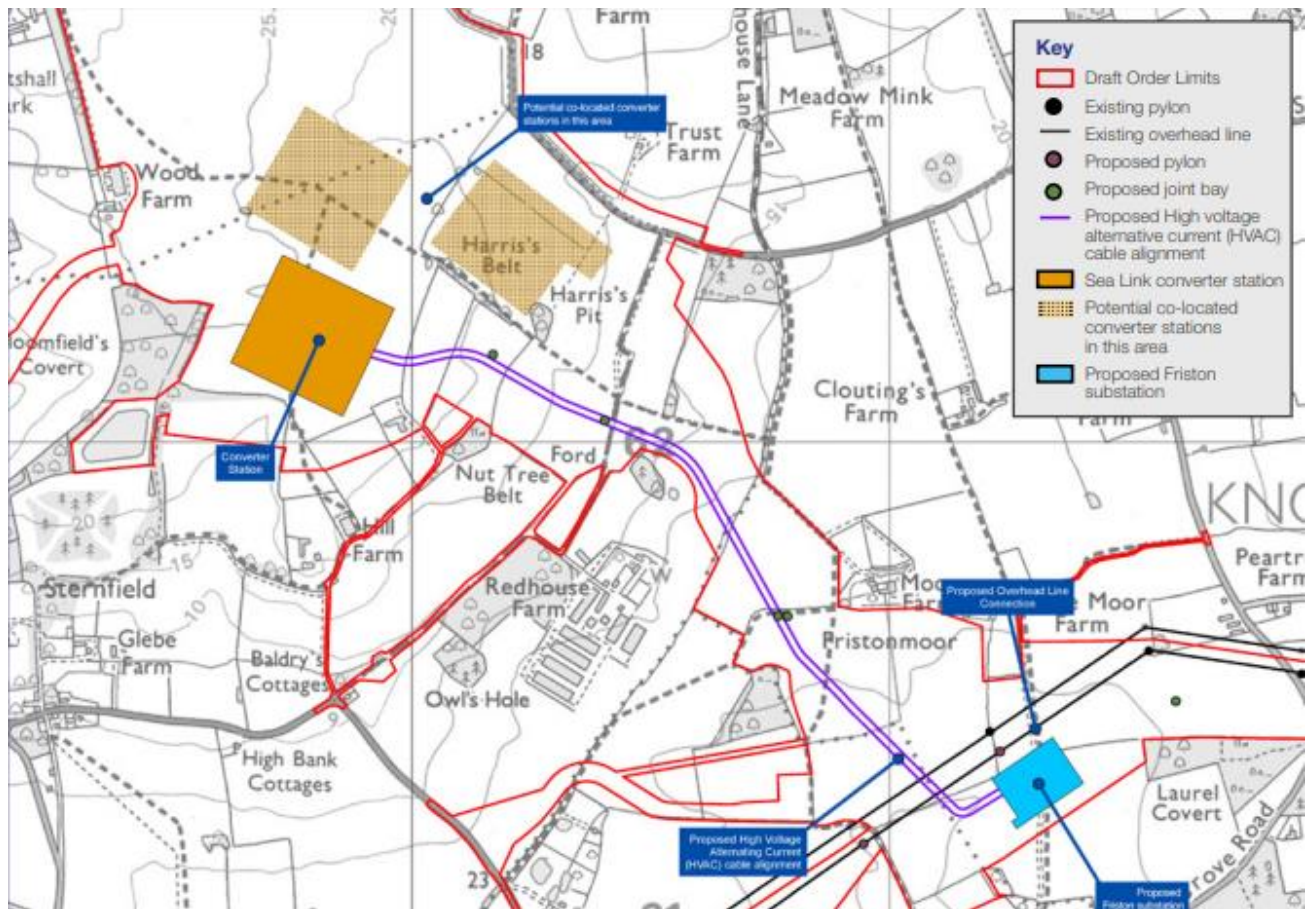
### Appendix C – Maps

#### Draft Order Limits

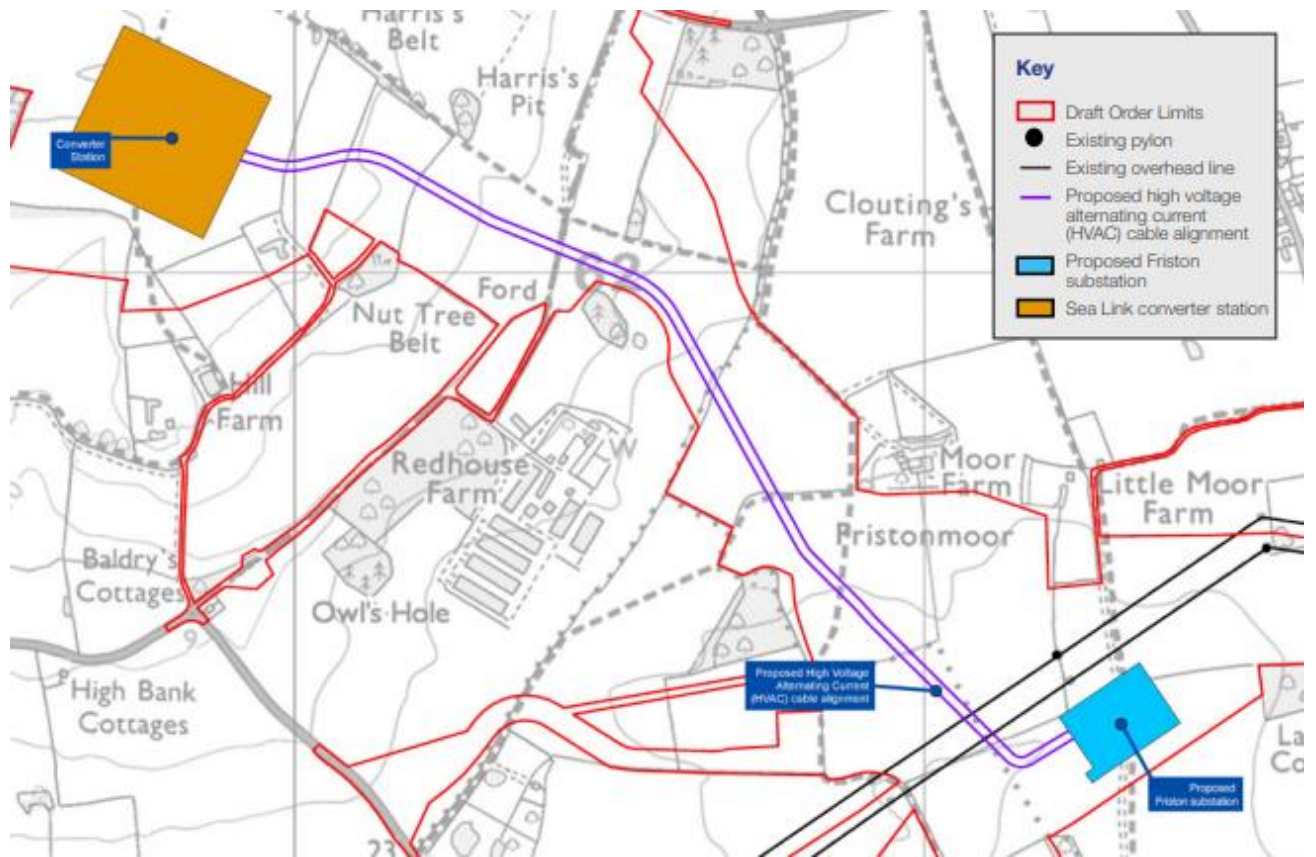




**Converter Station Site**



### High Voltage Alternating Current Cables



### Proposed Friston Substation

