

Date: 16 December 2022  
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Freepost SEALINK

Dear NGET,

### **Sea Link Non-Statutory Consultation**

Suffolk County Council welcomes the opportunity to comment on the proposal for a 2GW DC subsea connection between Suffolk and Kent, that is offered by this consultation. The principal concerns of the Council are set out in detail in its full response and are also summarised as follows.

#### **The relationship of Sea Link with the Nautilus and Eurolink Projects**

The Council is responding to this consultation on the basis that both Eurolink and Nautilus Multi-Purpose Interconnectors (MPIs), promoted by National Grid Ventures (NGV), will be connecting in Suffolk, notwithstanding the promoter's current efforts to secure a connection for Nautilus at the Isle of Grain in Kent, and notwithstanding the Council's comments raised in its response to Eurolink.

#### **The failure to adequately explain the need case for Sea Link**

The Council considers that the need case for the Sea Link project, in its proposed location, is not explicitly and clearly set out by National Grid Electricity Transmission (NGET) in the consultation material, but rather, has more clearly emerged during the consultation. Following participation in virtual and in person events, the Council understands that the need for this project is driven by firstly, a combination of local and regional and national increases in generation capacity across the network; secondly, by the need to ensure the required network redundancy and resilience, to support this new generation, under the terms of the Security and Quality of Supply Standard (SQSS).

During the consultation, and particularly at public consultation events, there was discussion and exploration of the role of energy islands in providing and supporting a coordinated offshore network, which is assumed could reduce the terrestrial harm of the project. The Council recognises that there is considerable public interest in this issue, which has also been bolstered by the recent publication of the North Sea Wind Power Hub feasibility report in November 2022. Therefore the Council requests that NGET provides information to such options, as to the role, utility, and timeliness, of energy islands to support, or not, greater offshore coordination whilst delivering the necessary targets and required deadlines.

Whilst it is recognised that the need case for this project is complex and multi-layered, the Council considers that it is essential for NGET to clearly explain this case to the communities, and the statutory and non-statutory consultees, in particular in any forthcoming consultations. The comments provided in the Council's response are on the basis that such a needs case can, and will, be provided.

## **The need for coordination between Sea Link, Euro Link and Nautilus**

It is noted that, unlike MPIs which could be connected elsewhere on the east coast of the United Kingdom, the Sea Link project must, in order to deliver the necessary network reinforcement, be connected in Suffolk.

If it is not possible for Nautilus and/or Eurolink to connect in other locations which are less constrained and harmful, along the wider east coast, the Council considers that co-location of Sea Link and these projects and coordination of cabling, construction and schemes of mitigation is essential. Therefore, cable landing points and potential converter station sites, that do not support such coordination are unacceptable to the Council.

## **Need for an exemplary approach to minimising long-term impact**

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

Where there are residual impacts that cannot be avoided, mitigated by design, or by further mitigation, the Council expects to see compensatory, or offsetting measures, put in place for the benefit of the local receiving environment and/or local communities. It would not be acceptable for the harm arising from residual impacts to be imposed on the local environment, or the community, and left to be weighed against the benefits delivered by the scheme, without first following all the steps of the mitigation hierarchy.

## **Summary of the SCC's site-specific responses**

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

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

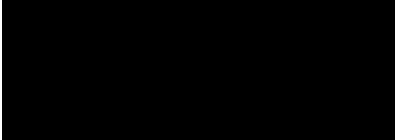
**Site at Theberton/Leiston Airfield:** NGET has discarded this option, but the Council considers that the site at Leiston Airfield should be further considered, particularly given that the Eurolink consultation has included this site in their options appraisal.

**Landfall site at Sizewell:** The proposed Landfall site at Sizewell is unacceptable, as it is too constrained and would not allow for more than one cable to make landfall, hence

coordination would be impossible. As a result, the cable routes referred to as “Site 1 and 3 Alternative Routes”, are not feasible or acceptable.

**Landfall site between Aldeburgh and Thorpeness:** This proposed landfall site has substantial ecological and other challenges and constraints, which need to be fully assessed.

Yours sincerely,



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