

Aldringham-cum-Thorpe Parish Council Comments on the Sea Link Non-Statutory Consultation Dated October 2022

Re: Sea Link Proposals in Suffolk

1. Introduction

Aldringham-cum-Thorpe Parish Council welcomes this opportunity to respond to National Grid's Non-Statutory Consultation for the Sea Link Grid Reinforcement Project.

The ScottishPower Renewables (SPR) EAN1 and EA2 projects as consented are already set to severely impact our parish during a two year long period of construction at landfall adjacent to Thorpeness, along two cable routes across an AONB, through the centre of Aldringham village and across the fields of Knodishall towards Friston substation. During four years of local protests and submissions of evidence to the Developers and to the Planning Inspectorate Examination, local opposition to those projects, focusing on damage to the the communities and natural environment, was made abundantly clear. Nevertheless, the Secretary of State eventually approved both projects, virtually as originally specified by the Developer. We are left with little faith in the NSIP process, feeling government consent became inevitable owing to the increased urgency of the national need to achieve security in energy supply. Nevertheless, we are responding to this latest Energy Project Consultation in the hope that National Grid is seeking our views in good faith.

2. The 'Leiston 400kV' connection at Friston

National Grid ESO allocated Grid connections for the Nautilus and Eurolink Interconnectors and for Sea Link Grid Reinforcement at Leiston 400kV.

The Sea Link Project Background document illustrates five options for landfall, converter station sites and cable routes, with an inland connection to the National Grid pylons at a substation at Friston village. This raises the first of fundamental issues. The project as described depends on the availability of that National Grid Substation at Friston village. However, it was proposed and consented within the ScottishPower Renewables (SPR) EA1N and EA2 NSIP planning applications. Those two projects are currently subject to Judicial Review at the High Court. At time of writing, the final outcome of that Judicial Review is not yet known.

By connecting more projects at Friston, National Grid would, whether by prior intent or otherwise, be creating a major 'energy hub' and industrialising a pleasantly quiet and rural part of the East Suffolk coastal hinterland. National Grid has so far failed to declare an overarching intent or plan for such an energy hub in the area and has not revealed any such a plan in Sea Link's Scoping Request to PINS.

National Grid Ventures (NGV) Nautilus and Eurolink and National Grid Electricity Transmission (NGET) Sea Link in combination have clearly illustrated to us through their consultation documents and maps that there is insufficient space in the relatively tiny area of land between Sizewell, Aldeburgh and Thorpeness for so many undersea

cables, landfalls through cliffs, 60m wide cable swathes and massive converter stations across a small rural area of East Suffolk and on land recognised nationally for the unique qualities of its landscapes, ecology and heritage.

We support numerous previous representations to Government and National Grid from many quarters including Dr Therese Coffey MP, Suffolk County Council, East Suffolk Council, and Town and Parish Councils that there must be an alternative and properly coordinated and integrated approach to onshore connections to and from the North Sea.

The CION assessment process used to allocate Grid connections to new projects must be altered to include a quantitative assessment of environmental impact.

For this latest wave of projects, as an alternative to the ruination of the East Suffolk Heritage Coast, more serious consideration must be given to brown field sites such as at Isle of Grain or Bradwell and other such locations along the coast, including those where landfall would be at greater distance from the nearest pylons. Other technologies involving offshore connections such as are already being adopted in other countries with North Sea coasts and the feasibility of a North Sea Offshore Grid should also be investigated.

In view of the above, Aldringham-cum-Thorpe Parish Council does not support National Grid's proposals that Sea Link, Eurolink or Nautilus or further projects should connect in the Leiston 400kV area.

Parish Council asks that our comments that follow below are taken into account in the event that National Grid continues to promote a connection in this part of East Suffolk for one or more of its major energy infrastructure projects

3. Project Coordination with other projects

The coast between Sizewell and Aldeburgh has been targeted by several offshore energy generating and transmission companies in addition to EDF's recently consented nuclear power stations (Sizewell C). There is little if any evidence that co-ordination between these works has taken place. Every effort must be made henceforth to avoid or minimise the cumulative impact of at least those projects intending to connect to the Grid connection at Friston.

As stated above, National Grid is independently bringing forward two other projects (Nautilus and Eurolink) within the same time scale. There are likely to be project inter-dependencies between all three projects.

Despite those projects being promoted separately, the Sea Link Consultation is seeking our views on the feasibility and acceptability of:

- a single landfall location for up to three projects;
- up to three converter stations being co-located;
- a single wide cable corridor shared by up to three projects.

In principle we believe it may be in the interests of some local communities that Converter Stations for these projects are located in the same area and as close together as is technically feasible, so as to mitigate the extent of impact on the East Suffolk Heritage Coast, its communities and Suffolk's tourist industry.

However, it has not been possible to compare the merits and demerits of each of the shortlisted landfall and converter substation options since there is no clear indication from the developer as to the intended route (by road and/or haul road) that would be used by construction vehicles and workers to access each site.

We note that National Grid and SPR have illustrated their respective cable corridor widths for HVAC and HVDC sections as follows.

- Sea Link - HVAC 60-100m between fences, HVDC up to 40m between fences
- Eurolink - HVAC 50m between fences, HVDC:30m between fences
- Nautilus - HVAC: 50m between fences, HVDC:30m between fences
- SPR EA1N: HVAC - 32m working width
- SPR EA2: HVAC - 32m working width

National Grid has unfortunately not supplied us with even an approximation for the total width of land that would be required as HVDC and HVAC working areas should two or three of the projects construct their cables and haul roads in the same corridor. Consequently the Parish Council is unable to form a view on whether or not up to three projects could or should be accommodated within one combined cable corridor and whether that would be acceptable to the local communities.

Regardless of the above, Aldringham-cum-Thorpe feels that if National Grid in its two guises (NGET and NGV) put forward applications for projects in this area, they should ensure that the main excavation works should be completed at one 'visit' rather than causing successive and continual disruption over several years.

National Grid is clearly now anxious to move forward quickly in gaining consent and implementing these projects. We are conscious that National Grid is no longer the same organisation that prior to privatisation managed our electricity network and was servant only to the people of Britain. It is now a profitable multinational energy corporation, accountable primarily to its shareholders and with major business interests in North America. We anticipate that a more coordinated approach would be in the commercial interests of Developers such as National Grid, potentially bringing cost reduction and resource sharing benefits.

4. AcT Parish Council comments on the Sea Link's proposed options in Suffolk

Our comments below refer to:

- Suffolk site 1 emerging preference
- Suffolk site 3 emerging preference
- Suffolk site 1 alternative
- Suffolk site 3 alternative (option 1)
- Suffolk site 3 alternative (option 2)

National Grid has confirmed that all other alternatives routes considered during earlier routeing and siting studies have been ruled out.

Whatever landfall and converter station site and onshore route is eventually chosen, ideally it would be capable of accommodating Sea Link, Nautilus and Eurolink projects (also EA1N and EA2 if sharing any sections of the SPR EA1N/EA2 route).

When selecting an onshore cable route, National Grid must specify a minimum distance from residential titles for its cable corridor construction working area, so as to protect residents during construction phases from noise, dust and visual disturbance. We suggest that criterion should be at least 200 metres.

We estimate that three Converter Stations, if all co-located, would be a enormous land footprint of 750metres by 150metres and each building could be up to 30metres high. No matter where they end up a comprehensive screening solution must be achieved and this should be something that enhances the area from the start, rather than waiting for saplings to achieve this over a fifty year period. The utmost effort must be put into this aspect of the project. These buildings may well be present for many years so the design, presentation and landscaping of the Converter Stations and their environs must match this, be it architectural or natural. Victorian engineers left us with sewage pumping stations and other infrastructure works of great stature that have stood the test of time and even outlasted their usage. Such attention to design, landscape and appearance must be matched and accompanied by adequate screening from the outset.

The whole of the really disruptive ground works must be achieved at 'one visit'. If one project is not ready to lay cables until later, then the appropriate ducting must be laid for future cable laying. Cable routes must be large enough to take such a provision. Aldringham-cum-Thorpe reserve its position on this aspect until the Developer can provide sufficient detail on cable corridor design progress updates on alternative offshore connectivity options.

4.1 Re: Suffolk site 1 alternative and Suffolk site 3 alternative (option 2)

These routes are of particular concern since both Cable Corridors would pass through Aldringham-cum-Thorpe Parish. The HVAC corridors would both pass through Aldringham village at its North-South midpoint.

National Grid has recognised some of the difficulties and disadvantages of Suffolk Site 1 alternative' and 'Suffolk Site 3 alternative (option 2) in Sea Link *EIA Scoping Report - Volume 1 – Main Text Part 1 Introduction 1.3.4.47* and *EIA Scoping Report - Volume 1 - Part 2 Main Text Suffolk Onshore Scheme 2.1.6.9* and *2.1.7.9*.

Although 1.1.4.5 states that 'The Hundred River is crossed by the Scoping Boundary to the south of Aldringham, according to all maps of the parish it would actually cut the village into two separate halves during construction phases.

There is a 'pinch point' where the route crosses the Hundred River, the B1122 Aldeburgh Road, an area of 'Priority Deciduous Woodland' to the south of Aldringham Court including the area protected by Local Authority Area Tree Preservation Order SDCDC/87/00030.

Options in Aldringham at that pinch point would be further constrained owing to the cumulative impact of any additional cable installations in combination with those likely to be imposed by the construction of two cable corridors for SPR East Anglia ONE North and East Anglia TWO wind farm projects at the same location.

This is a sensitive area of Priority Woodland in a river valley and is also classified by East Suffolk Council as Flood Risk 3b.

The Local Authority considered the feasibility and potential impact of a further cable crossing here in its response to the non statutory Nautilus Consultation 2021, stating that it *"could not be satisfactorily mitigated and that there are other less constrained routes; that present here are particular ecological, landscape, heritage and residential amenity challenges at the pinch point and crossing of the Hundred River. Trenchless Cable Installation technologies such as HDD would be required in this locality, but this has not been demonstrated to be possible by other developers owing to the constrained width of the area available"*.

A further constraint on siting a cable crossing in Aldringham may well be the area of Common Land (CL174) to the south of and adjacent to B1353 Thorpe Road.

4.2 Ecology Surveys in the Aldringham River Hundred Area

A Sea Link *Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES)* should not rely upon the *ScottishPower Renewables EA1N and EA2 2018 Extended Phase 1 Habitat Surveys - Part 1* of 2(b).

It contains important and demonstrable omissions and errors in its documentation of habitats in Aldringham Hundred River Hundred (former) Special Landscape Area.

In particular, we recommend an independent survey of the area of riparian meadow (allegedly 'Wet Woodland') between Aldeburgh Road and The Hundred River and the water meadow east of the Hundred River.