

# **Aldringham-cum-Thorpe Parish Council Comments on the Sea Link Scoping Report dated October 2022 including information to be scoped within the ES**

## **1. Introduction**

Aldringham-Cum-Thorpe Parish Council welcomes this opportunity to respond to National Grid's Sealink Interconnector Project to reinforce the energy network to meet the target set by Government of 50 gigawatts of offshore wind generation by 2030.

Aldringham-cum-Thorpe consists of the villages of Aldringham, Thorpeness and part of the hamlet of Sizewell.

This document consists in the main of our comments on onshore aspects relevant to this Parish.

This response is not comprehensive and we reserve the right to comment further on all aspects including project scope as more information becomes available during the NSIP pre-application and application processes.

## **2. Local Context**

The local area that includes this Parish has already been heavily impacted by several other major Energy Infrastructure projects, including:

- Nuclear Power Stations at Sizewell A and B
- The proposed Sizewell C Nuclear Power Station
- ScottishPower Renewables (SPR)'s East Anglia ONE Offshore (EA1N) and East Anglia TWO (EA2) Offshore Wind Farms (consented 2022) - two cable corridors would pass through centre of this Parish

In addition to Sea Link, National Grid is also consulting on two additional projects:

- National Grid Ventures' Continental Interconnector project Nautilus
- National Grid Ventures' Continental Interconnector project Eurolink

The Sealink scheme in Suffolk involves underground and subsea cables connecting the network between the 'Leiston area' and Kent via high voltage converter stations, an extension to the planned Friston substation and a cable connection to a landfall point where it transfers to a marine cable. This particular project is programmed to start towards the end of 2024 with the most disruptive works, i.e. the groundworks involved in laying the cable from landfall to the converter Station, completed in the first two years. The construction of the station and the works to make the connection with the proposed Friston substation are targeted to finish around 2030.

Aldringham-Cum-Thorpe Parish Council has issues regarding these latter works. At the time of writing, the status of the Friston Substation is still questionable. There is a Judicial Review over its proposed role and suitability. When Friston was initially planned, it was conceived as the Substation to make the connection to the national grid for the two Scottish Power Projects, EA1N and EA2. It would seem it is now planned to be augmented and transformed into an Energy Hub for other energy schemes such as Sea Link to connect with the Grid.

There are other questions regarding the appropriateness of the site on six counts including flood risk and heritage, and that was before this project had its sights on their connection. We know that by the very nature of the Planning Process we must not comment here on other similar schemes. However, as was found in the Scottish Power hearings, the cumulative effects of a queue of up to ten Energy projects making their way across pristine Suffolk countryside must be taken into account. If there was ever a case of 'an elephant in the room', this is surely one of giant proportions. We will have already been living for several years of SPR's projects, before National Grid break ground in this area, with more to follow those. It must be also remembered that the £30 billion construction of Sizewell C Nuclear Power Station borders our Parish. Much of the land in Sizewell village south of Sizewell Gap lies within our parish.

National Grid Ventures will be looking for similar works within their Eurolink and Nautilus projects, using routes from landfall to grid connection at Friston. If, as it appears, there is a certain inevitability of these schemes, then it would make sense that provision should be made for duct and cable laying to be undertaken for all three schemes at one operation. We have always argued for a co-ordinated approach and this should be a perfect opportunity. It does however leave us with a complex of three converter stations, measuring 750 metres by 150 metres by 30 metres high, squatting unceremoniously to the south-west of Knodishall. It would take some most ingenious architecture to blend and disguise this into the landscape.

### 3. Project Scoping and Stakeholder Consultation

We believe that commencement of a Sea Link non statutory Consultation and submission of this Scoping Report is premature, since:

- The Sea Link Scoping Report assumes that connection connect to the National Grid would be made at Friston village. However, the creation of an energy hub and Grid connecting Substation at Friston village is subject to Judicial Review at the High Court. The final outcome of that has not yet been determined.
- National Grid is bringing forward two other projects (Nautilus and Eurolink) within the same time scale. These are also at pre Application Stage. The developers claim they are being coordinated with Sea Link. They are both highly likely to impact scoping, including Sea Link's design and onshore site selection. There are clearly interdependencies between all three projects.
- Renewables UK is working with National Grid, SSE Renewables and RWE Renewables UK with the intention of coordinating the design of North Falls and Five Estuaries Offshore wind farms with one or more or all of Sea Link, Nautilus and EuroLink projects. A decision on this is not yet available and may impact Sea Link design in a major way.
- In view of so many projects coming forward within the same timescale, all impacting the same approximately 4 square miles of the Suffolk's Heritage Coast and the communities therein, an overarching Energy programme for these separate but coordinated and interdependent NSIPs is essential before any individual project confirms its scope with PINS.

Should the Development change substantially once a decision on whether and how to coordinate a common onshore design with North Falls, Five Estuaries, and Eurolink has been made, the Applicant must be required to request a new Scoping Opinion.

National Grid is at present conducting concurrent consultations on:

- Sea Link Scoping Report (25 Oct 2022 – 22 Nov 2022),
- Sea Link non statutory consultation (25 Oct 2022 – 18 Dec 2022),
- Eurolink non statutory consultation (25 Oct 2022 – 18 Dec 2022).

In combination, these consultations are already imposing an unacceptable burden on the several onshore communities and councils, impacted by both projects. This is leading to confusion and consultation stress and fatigue. This situation is incomprehensible since PINS did advise the Sea Link project team on 20 June 2022 at a S51 meeting(a) to “at least wait for the Consultation period to close before submitting its scoping request”.

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(a) PINS Sea Link Project - s51 Advice <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/sea-link/?ipcsection=advice4>. Suffolk Onshore Scheme

The scope of works are all similar in terms of the Construction works to what we have seen in SPR's previous projects with most items scoped in. There are some items that differ, notably working hours, which would look to include provision for 24/7 without requesting special notification. We understand a horizontal drilling element beneath the RSPB site at North Warren, such times would be permissible with the lower db level of sound. However without time limitations, a culture of permanent site occupancy prevails, where contractors suit themselves rather than the concerns of neighbouring parishioners and even with reduced noise levels there is light pollution at the work-face and the site compounds. Aldringham-cum-Thorpe Parish Council makes every effort to be a 'dark-skies' council when assessing planning applications in this rural and wildlife rich area. It is also of great concern regarding the Converter station and the Substation at Friston, once they are operable, that lighting for maintenance and security will exude an aurora glowing behind the wooded shielding.

There are other elements in the Scoping Report that have been scoped out but raise concerns. No plan is envisaged to deal with spillages of fuel and chemical works from those vessels and equipment involved in the maritime aspect of the project. Emphasis is purely that those vessels are licensed to carry out these works and bound by codes of conduct, but as we all know accidents happen. We feel that there should be some provision and policing of this element of construction.

We also note that there are no specific plans within the project for engaging local labour from the East Suffolk locality. When asked about this at a local community consultation event, the Applicant's representative stated that temporary employment may be available during construction, but long term employment and training was unlikely. Perhaps there might be full time placements on the maintenance of the various substations, but in terms of training and well paid full time jobs, this is an opportunity missed.

We observe that there is no indication of any sort of Construction Traffic Strategy or Plan in the document, or indeed that the Applicant has even established that access to construction sites would be feasible. That may be a consequence of the premature submission of the Consultation Report and Consultation material. We have not been able to see how construction and worker vehicles would access the alternative cable corridor routes and therefore it has not been possible for us to make a complete assessment of their relative merits and demerits.

There is no information on day-to-day movement of materials for the ducting and cable installation, the machinery for the drilling machinery and also the major pieces of plant within the converter stations. There is no 'meat on the bone' here. Is this to be in place at the next consultation stage?

#### **4. Comments on Sea Link EIA Scoping Report (Main Text Parts 1 and 2)**

Comments in the following sections of this response focus primarily on scoping aspects directly or indirectly relating to the Parish of Aldringham-cum-Thorpe.

##### **4.1 Suffolk Onshore Scheme Scoping Boundary**

A fundamental concern is that the Applicant has omitted Aldringham-cum-Thorpe from its list of settlements adjacent to the Project Scoping Boundary (ref. Para 1.1.4.3 of *EIA Scoping Report - Volume 1 - Part 1 Introduction*) although it is clearly illustrated as being so in Figure 1.1.2.

A further concern is that 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 cross at the North-South midpoint of Aldringham, cutting the village into two separate halves during construction phases.

## 4.2 The proposed Development

### 4.2.1 Onshore Site Selection

The Applicant's Site and Cable Route Selection work already carried out has been useful in narrowing onshore scope to S1 and S3. We therefore are assuming all other sites are now out of scope.

### 4.2.2 Coordination with NGET EuroLink and NGV Nautilus and EuroLink projects

We believe it is in the interest of the local communities that all three Converter Stations for these projects are located at the same place and as close together as is technically feasible.

Similarly, the cable corridors for all three projects should share a common route.

That is in order to mitigate the extent of impact on the East Suffolk Heritage Coast, its communities and Suffolk's tourist industry through inter alia:

- destruction of landscape
- construction activity
- noise during construction and operation phases
- disruption of local roads,
- light pollution
- ecological harm
- damage to Suffolk's tourist economy.

### 4.2.3 EIA Approach and Method

The 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 omissions and errors in its documentation of habitats in Aldringham Hundred River Hundred Special Landscape Area. We recommend an independent survey of the area of riparian meadow (alleged to be 'Wet Woodland') between Aldeburgh Road and The Hundred River and the water meadow east of the Hundred River.

### 4.2.4 The Cumulative effects of emerging preferred options onshore – Aldringham-cum-Thorpe

The HVAC corridor and graduated swathe for 'Suffolk Site 1 alternative' and 'Suffolk Site 3 alternative (option 2)' would both pass through the centre of Aldringham.

We ask PINS to scope out those land areas within the parish that lie within the Sea Link proposed HVAC corridor 'Graduated Swathes' for Suffolk Site 1 alternative and Suffolk Site 3 alternative (option 2) that overlap the Cable Corridor Order Limits for the SPR EA1N or EA2 projects(c).

Following planning consent in March 2022, we understand SPR has formal permission from the Secretary of State for its exclusive use of the **whole width** between the DCO Order Limits as certified within Part 2 of Schedule 17 of the EA1N and EA2 DCOs(d).

Although SPR may later microsite and reduce footprint in some places, at this stage there is no certainty that any areas of overlap will be available for Sea Link to use as a cable route. They may not even be available at the time when a Sea Link DCO planning application is submitted to PINS, especially in view of SPR project delivery delays. It would be misleading to all concerned to leave them within the scope of this EIA.

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(b) PINS East Anglia ONE North project – See Figure 22.4c of East Anglia ONE North Limited 6.2.22.4 Environmental Statement - Figure 22.4a-f - Extended Phase 1 Habitat Survey Results [EA1N APP-277](#)

PINS East Anglia ONE North Limited 6.3.22.3 Environmental Statement - Appendix 22.3 - Extended Phase 1 Habitat Survey (Part 1 of 2) [EA1N APP-503](#)

(c) PINS East Anglia ONE North project – Sheet 5 of East Anglia ONE North Limited Deadline 11 Submission - 2.3.2 EA1N Works Plan – Version 07 [EA1N REP11-004](#)

(d) PINS EA1N REP12-013 East Anglia ONE North Limited Deadline 12 Submission - 3.1 EA1N Draft Development Consent Order (Clean) (Version 8) [EA1N REP12-013](#)

The Applicant has recognised some of the difficulties and disadvantages of Suffolk Site 1 alternative' and 'Suffolk Site 3 alternative (option 2) in *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*.

There is an ecological 'pinch point' where the route crosses the Hundred River, the B1122 and the area of 'Priority Deciduous Woodland' to the south of Aldringham Court. Options in Aldringham at that pinch point will be further significantly further constrained owing to the cumulative impact of any additional cable installations in combination with those that will be imposed by the construction of two cable corridors for SPR October 2021 East Anglia ONE North and East Anglia TWO wind farm projects in the same location and that have already received Secretary of State consent. This is a sensitive area of Priority Woodland river valley and is also classified by ESC as Flood Risk 3b. The local authority considered potential impact here and feasibility 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*".

Please note that the Applicant has omitted to include East Anglia TWO project (already consented) in its 'zone of influence (ZOI) - *Appendix 1.5.A Inter-Project Cumulative Effects Long List of other developments within the ZOI*.

#### **4.2.5 Noise and Vibration**

Re: *Environmental Impact Assessment Scoping Report Volume 1 Main Text Part 2 Suffolk Onshore Scheme - Table 2.10.6 - Construction Noise effect levels at residential receptors*

*Time Period:* Local working hours should be those negotiated between ScottishPower Renewables (SPR) and the Local Authorities as specified in the DCO for EA1N and EA2 (i.e. not as specified in Table 2.10.6 which seems to imply the possibility of 24/7 working during Construction.

**END**