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By email only:

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**Suffolk Coast & Heaths AONB Partnership response to:
National Grid Sea Link Public Consultation Oct to Dec 2022**

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership thank the National Grid as proposers of Sea Link project for the opportunity to comment on their proposals. These proposals will include elements that will impact on the nationally designated AONB such as:

- A new 2 gigawatt (GW) subsea high voltage direct current (HVDC) electricity connection of approximately 140 km in length, predominately offshore but with part in the nationally designated Suffolk Coast & Heaths AONB.
- HVDC converter stations.
- High voltage alternating current (HVAC) connections onto the national electricity transmission system, proposed for Friston in Suffolk.

The AONB Partnership notes that the proposals will be for infrastructure to 'share' electricity across the country and internationally.

The AONB Partnership

The Partnership was formed in 1993, it comprises public, private and voluntary organisations who are committed to conserving and enhancing the Natural Beauty of the AONB. The Partnership's role is to act as an advocate for the AONB and oversee the delivery of the AONB Management Plan. The AONB Partnership consists of:

Babergh Mid Suffolk District Council, East Suffolk Council, Essex County Council, Ipswich Borough Council, Suffolk County Council, Tendring District Council, Community Action Suffolk, Country Land and Business Association, The Crown Estate, Defra, Environment Agency, Forestry Commission, Historic England, National Farmers' Union, Natural England, National Trust, Royal Society for the Protection of Birds, Suffolk Association of Local Councils, Suffolk Coast Acting for Resilience, Suffolk Coast Ltd, Suffolk Farming & Wildlife Advisory Group, Suffolk Preservation Society, Suffolk Wildlife Trust.

It should be noted that:

Many of these partners are public bodies or statutory undertakers which have the duties to conserve and enhance the Natural Beauty of the AONB as set out in section 85 of the Countryside and Rights of Way Act (2000). It is anticipated that these partners, and other members of the Partnership, will provide separate consultation responses that reflect these and other interests and responsibilities.

Suffolk Coast & Heaths AONB Partnership response National Grid Sea Link Public Consultation Oct to Dec 2022:

The AONB Partnership will restrict itself to commenting on proposals that impact its area of interest, ie those proposals that impact the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. The AONB Partnership has formed its view on these proposals from information provided by National Grid from:

- The Project website accessed from 25 Oct 2022
- Information shared by project proposer at working group meetings
- Site visits
- Discussion with AONB partners and others with knowledge of the proposals

Summary Suffolk Coast & Heaths AONB Partnership response to National Grid Sea Link Public Consultation Oct to Dec 2022. It considers that:

- All proposals should adhere to all relevant policy including that outlined in this response.
- New electricity transmission infrastructure should avoid nationally designated landscapes such as the Suffolk Coast & Heaths AONB.
- That the justification of landfall being in AONB should be shared and explained as this decision channels all future decisions that will lead to damage to the AONB.
- The cable routes, whether by Horizontal Directional Drilling or open trench will lead to loss of parts of the AONB delivering statutory purpose during construction.
- As the schemes proposer has identified sites for a convertor station outside the AONB and outside of its setting they should be selected to avoid unnecessary damage to the nationally designated landscape.
- The loss of part of the AONB to deliver its statutory purpose during construction is likely to have a negative impact on the tourism industry in the AONB that relies on an outstanding landscape to drive its business.
- Negative impacts to the defined qualities of the AONB, including landscape quality and natural heritage features should be subject to the mitigation hierarchy.
- Impacts will be experienced by the defined Heritage Coast, and they should be assessed in a similar way to the impacts on AONBs.
- The proposed scheme needs to be considered in combination with other energy projects in the area and cumulative affects should be assessed and a collaborative approach should be taken to minimise negative impacts.

The AONB Partnership consider that infrastructure of this magnitude does not contribute to the delivery of statutory purpose of the AONB. It acknowledges that the project's proposer adheres to the draft EN-5 to underground cables through the AONB but consider the construction processes involved will lead to adverse impacts on the AONB during construction.

The AONB Partnership considers the decision on the location of the proposed convertor station site should consider the statutory purpose of the AONB.

The AONB Partnership note that the project's proposers have identified two potential sites that are likely to deliver coordination between its project and two interconnector projects promoted by National Grid Ventures, Nautilus and Eurolink.

Each of the three converter stations required for these projects will be approximately five to six hectares in area and 25 to 30 metres high. Therefore, whilst consolidation of these projects into one site would significantly reduce the spatial extent of adverse impact, this will not avoid a significant magnitude of change in the hosting location, or substantial residual visual impact in the locality.

The AONB Partnership considers that a consolidated site should, as far as possible, minimise adverse impact in the long term and to the nationally designated AONB. To achieve this, short-term issues around ease of construction should be set aside, and focus should be on achieving the best available operational outcome.

The AONB Partnership is aware of several other Nationally Significant Infrastructure Proposals impacting on the AONB. While recognising the that the proposer of this scheme is engaging with other project proposers the AONB Partnership considers the need for the cumulative impacts of these developments to be considered and that impacts on the nationally designated landscape should be assessed.

While the AONB Partnership is not responsible for the defined Heritage Coast it has many shared aspirations. Heritage Coasts were set up to protect undeveloped coastline and proposals such as those for Sea Link have the potential to negatively impact the defined Heritage Coast. The AONB Partnership considers that any assessment of impacts on the AONB should be mirrored by similar assessments on the qualities of the Suffolk Heritage Coast.

The Suffolk Coast & Heaths AONB Partnership considers that the proposals need to be determined against the relevant National Policy Statements, Legislation and other relevant policy, plans and guidelines. The AONB Partnership notes that:

- A) The Overarching National Policy Statement for Energy (EN1), paragraph 5.9.9, states:

Development proposed within nationally designated landscapes

National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC [Now Planning Inspectorate] should have regard to in its decisions. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC [Now Planning Inspectorate] in deciding on applications for development consent in these areas.

The AONB Partnership considers that to conform to EN1 that the proposed developments should not significantly negatively impact nationally designated landscape.

- B) The National Policy Statement for Renewable Energy Infrastructure (EN-3), paragraph 2.5.33 states:

In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.

The AONB Partnership considers that to conform to EN3 that the proposed developments should not have significantly negatively impact nationally designated landscape.

- C) The draft National Policy Statement EN-5 on Electricity Networks Infrastructure States in para 2.11.11:

The Horlock Rules – guidelines for the design and siting of substations were established by National Grid in 2009 in pursuance of its duties under Schedule 9 of the Electricity Act 1989. These principles should be embodied in Applicants' proposals for the infrastructure associated with new overhead lines.

It then briefly references the Horlock rules including:

seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections

The AONB Partnership considers that to conform to the draft EN-5 that the proposed development should pay regard to AONB purpose.

D) Section 85 of the Countryside and Rights of Way Act (2000) that states:

General duty of public bodies etc

(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

(2) The following are relevant authorities for the purposes of this section—

(a) any Minister of the Crown,

(b) any public body,

*(c) **any statutory undertaker** [our emphasis]*

(d) any person holding public office.

The AONB Partnership considers that National Grid is a statutory undertaker and is required to pay due regard to the purpose of the AONB when undertaking its operations and decision making.

E) The statutory Suffolk Coast & Heaths AONB Management Plan 2018-23 outlines within its 25 year vision for the area that:

Nationally Significant Infrastructure Projects such as energy production and its associated infrastructure should seek to avoid damage to the natural beauty of the AONB and where this cannot be achieved it should seek to minimise, mitigate and compensate for any residual damage.

The AONB Partnership considers that National Grid's Sea Link proposals for development are required to meet the aims of the AONB Management Plan.

The AONB Partnership recognise six elements of interest in the proposals from the consultation that it will comment on:

- i) Landfall**
- ii) HVDC cable routes**
- iii) Converter stations**
- iv) HVAC cable routes**
- v) Substation**
- vi) Socio-economic impacts**

These elements of the proposals are considered below:

i) Landfall

The AONB Partnership note that all landfall sites in the proposals are in the nationally designated landscape. Major development, such as outlined in the proposals, does not contribute to the natural beauty or the ability of AONBs to meet its statutory purpose to conserve and enhance natural beauty.

It considers that if landfall sites outside the AONB are available then this would avoid the likely significant negative impacts of any converter stations, cable routes and substations required to deliver the project on the AONB.

The AONB Partnership note there is a relationship between preferred landfall sites and converter sites in terms of technical feasibility, impacts and cost. It notes that the current proposer 'emerging preference' is for landfall site 2.

If landfall is to be at site 2 (S2), or any other site in the nationally designated landscape, then the ability of the AONB to deliver its statutory purpose during construction will be negatively impacted.

The AONB Partnership are aware of justified concerns from landowners that would be impacted by landfall at site 2. The AONB Partnership will not be providing comment on the suitability or otherwise of this landfall site until the impacts are fully assessed and understood.

The AONB Partnership considers that National Grid Electricity Transmission should:

- Provide an explanation and justification why a landfall site within the AONB is its emerging preference.
- Provide evidence that during scoping, sites outside the AONB for landfall were considered, to fulfil policy drivers relating to major development within nationally designated landscapes, and on what grounds these were dismissed.
- Assess and publish the impacts of the proposals relating to landfall site 2 and explain how concerns will be avoided, minimised, mitigated and compensated.
- Avoid, minimise, compensate and mitigate any negative impacts on the AONB during construction relating to landfall.

ii) HVDC cable routes

The AONB Partnership notes that impacts on the nationally designated landscape from the required cables are proposed to be minimised by undergrounding through the AONB as presumed in the draft National Policy Statement EN-5.

It notes that the undersea cable will be brought ashore via Horizontal Direct Drilling at the proposed landfall sites including the project's proposers emerging preference site 2. It notes that the proposals state that this method of undergrounding cables will change to open trench methodology after a few hundred metres into the AONB. Open trench methodology is widely recognised to have more impacts on during construction than Horizontal Directional Drilling.

The AONB Partnership recognise the legitimate concerns of those potentially impacted by the chosen cable routes and undergrounding methods and consider those concerns should be addressed to avoid unnecessary damage.

The AONB Partnership note that the proposed route corridor is identified as a graduated swathe in proposals seen and contained within the Corridor and Preliminary Routeing and Siting Study dated October 2022. It notes that the defined characteristics of the AONB include natural heritage (including wildlife), cultural heritage (including archaeology) and AONBs have two non-statutory secondary purposes including to take account of needs of agriculture, forestry, fishing and local rural industries.

The AONB Partnership considers:

- That undergrounding cables in the AONB is a policy requirement
- That the impacts during the construction of underground cables will have a negative impact on the AONB.
- That the length of underground cabling achieved via the open trench technology will have a significant negative impact on this part of the AONB to deliver its statutory purpose during the construction period.
- That micro siting of the preferred cable route should have as a priority the avoidance of negative impacts on the AONBs defined natural beauty, including natural heritage (wildlife interests) and cultural heritage (archaeological interests).
- That where damage to the AONB's defined natural beauty during the construction of underground cabling should be compensated and mitigated for. For the avoidance of any doubt, it does not consider undergrounding cables in the AONB to be compensation and mitigation as that is a policy requirement.

iii) Converter stations

The AONB Partnership would draw the proposer's attention made earlier in this response that alternative landfall options, outside the AONB, should be considered to avoid the potential of infrastructure required to deliver the Sea Link project (cable routes, converter stations and potentially sub stations) preventing the delivery of statutory AONB purpose.

The AONB Partnership note that the proposers of the scheme have applied the Horlock Rules and other policy drivers to considerations in identifying a site for the converter station. Processes outlined in the Corridor and preliminary Routeing and Sting Study (October 2022) have identified sites 1 and 3 as emerging preferences.

The AONB Partnership considers is that site one at Aldeburgh is not acceptable due to its location in the setting of the AONB.

This site is highly constrained as it is situated in gently rolling countryside within the setting of, and on two sides adjacent to, the Suffolk Coast & Heaths AONB on the outskirts of Aldeburgh, to the north of Hazelwood Hall.

It is wholly within the Estate Sandlands landscape of the Suffolk LCA. It is typical of that landscape, consisting of a pattern of regular late enclosure fields, plantation woodlands and coverts, characteristic of that landscape type. Whilst the general pattern of the landscape appears to have remained reasonably intact since the 1st edition Ordnance Survey, there have been some modifications to the field pattern and alignment of footpaths.

The site appears to be elevated by at least 10m relative to the A1094, which runs along the northern side of the boundary of the Suffolk Coast and Heaths AONB. The site is within 2km of the Alde-Ore Estuary SSSI and RAMSAR sites, the Sandlings SPA, North Warren RSPB Reserve, Snape Warren SSSI, the Alde-Ore & Butley Estuaries SAC to the south, and further smaller SSSI sites. It is adjacent to Great Wood, an ancient woodland.

The AONB Partnership considers that structures such as converter stations should not be located in nationally designated landscapes as they should be considered major development. A development of the proposed scale would not conform with national policy or contribute to the statutory purpose of the AONB.

While the AONB Partnership does not consider this type of development appropriate for a nationally designated landscape it considers that any locations outside the AONB should consider the needs of wildlife, landscape, historic features, public and residential amenity, access, flood risk and should listen to professionals and residents' views when identifying sites to be considered.

The AONB Partnership notes that potential effects on the AONB have been scoped in for the operation of site 1 because of the risk of significant adverse effects, p69 EIA Scoping Report. Given the location and scale of the project alone, and in combination with other proposed projects, it appears unlikely that project proposers will be able to eliminate significant adverse impacts on the AONB, given the proximity and elevation of the site relative to the AONB.

Furthermore, it appears likely that development in this location would also give rise to in combination effects between these projects and the consented, but as yet unbuilt, Sizewell C project.

The AONB Partnership considers that:

- The proposed site 1 for a convertor station should be dismissed as it is adjacent and in the setting of the AONB and other sites that do not have a significant impact on the AONB have been identified.
- Convertor stations are large structures to locate without causing significant negative landscape impacts. The proposers of the scheme should seek to minimise the scale of the buildings as much as possible and limit those impacts as far as possible by landscaping, use of colour in design, minimise external lighting and listening and acting on concerns of local residents and interests.

iv) **HVAC cable routes**

The AONB Partnership considers that the use of a HVAC cable link between the convertor station and substation should not be an issue for the AONB Partnership as this infrastructure should not be located within the nationally designated landscape.

The AONB Partnership considers that:

- The connection between the convertor station and substation should not be not an AONB issue that the project proposer should consider the needs of residents and businesses impacted as well as avoiding, minimising and mitigating any impacts on the natural and historic environment.

v) **Substation**

While recognising the legitimate concerns of those impacted by the proposed Friston Substation the AONB Partnership's remit relates to the designated AONB and its setting. As such it welcomes the proposals to use the site of the proposed Friston sub station rather than extend the Sizewell B or planned Sizewell C substations.

The AONB Partnership considers that:

- The impacts on the AONB from the proposers preferred option of using the site at Friston accrue from other elements of the project such as landfall, cable routes and potential convertor stations that are linked to the need for a substation.

vi) Socio-economic impacts

In addition to landscape and wildlife impacts the proposers should consider the impact on the AONB's cultural heritage. The AONB has significant cultural significance including those relating to the works of composers, such as Benjamin Britten, artists such as Maggi Hambling, M W Turner and Walter Crane, poets such as George Crabbe and numerous photographers including the contemporary Gill Moon.

The AONB Partnership considers that the proposer of the project considers the economic impacts of its project and on the tourism industry and residents' quality of life.

Whilst it is not the role of the AONB Partnership to promote the visitor economy, that economy is a vital part of the functioning of a thriving protected landscape. The AONB, as a designation, has an important role to play in the tourism industry, that supports over 4,000 jobs and is worth over £250M pa. The natural beauty and special qualities of the AONB are a key driver for the tourism industry, in particular its landscape quality, tranquillity and natural cultural heritage features.

Furthermore, residents in the AONB enjoy benefits associated with AONB natural beauty and special quality indicators. Resident's quality of life is enhanced by the statutory purpose of the AONB.

The AONB Partnership considers that:

- The if significant industrial development were to be introduced into the AONB it will have an impact on the ability of the AONB to deliver statutory purpose and have an associated negative impact on providing the 'canvas' for the tourism industry. This impact will have a knock on effect on the viability of this sector and residents' quality of life during operation and construction and should be avoided, minimised, mitigated and compensated for.

Yours sincerely,



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