

National Landscape Office  
Saxon House  
Hadleigh Road Industrial Estate  
Whittle Road  
Ipswich  
IP2 1UH

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By email only:  
[contact@sealink.nationalgrid.com](mailto:contact@sealink.nationalgrid.com)

**Suffolk Coast & Heaths AONB Partnership response to:  
National Grid Sea Link Statutory Consultation Oct to Dec 2023**

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. In Nov 2023 AONBs rebranded to National Landscapes, but references to the designation in law and policy remain as AONB, hence this response uses the AONB nomenclature.

The AONB Partnership considers that the proposals need to be considered in combination with other energy projects in the area. This includes consideration of dual consenting processes with other projects such as Lion Link, coordinating construction works such as cable routes and required infrastructure, construction timings and assessment of cumulative effects in a coordinated fashion of the multiple energy projects impacting east Suffolk and the AONB.

It considers that there is a risk of public perception of the AONB to be associated with major energy projects and not its statutory purpose, to conserve and enhance natural beauty.

The AONB Partnership understands that the proposals have been designed to increase the capability of the network to carry electricity from where it is generated to homes and businesses across the country. And that the proposals are made up of three elements:

- The Suffolk onshore scheme.
- The offshore scheme.
- The Kent onshore scheme.

It understands the Suffolk onshore element will include the following that is likely to have an impact on the nationally designated landscape:

- A landfall between Aldeburgh and Thorpeness.
- An HVDC underground cable between landfall and a proposed converter station near Saxmundham, including a transition joint bay approximately 900m inshore from a landfall point where the cable transitions from onshore to offshore technology.

It understands the offshore element will include a 130km subsea HVDC cable that land between Aldeburgh and Thorpeness that will pass through the Suffolk Heritage Coast, which extends 3km seaward from Mean High Water.

The AONB Partnership recognised that the proposed substation at Friston and converter station near Saxmundham are both located outside the nationally designated AONB.

However, it considers that the landfall and underground cable has the potential to have a negative impact on the AONB and that the subsea cable has the potential to have a negative impact on the defined Suffolk Heritage Coast.

#### **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), as amended in the Levelling Up and Regeneration Bill (2023).

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 Statutory Consultation Oct to Dec 2023:**

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 and associated Suffolk Heritage Coast. The AONB Partnership has formed its view on these proposals from information provided by National Grid from:

- The project's website.
- Information shared by project proposer at working group meetings.
- Site visits.
- Discussion with AONB partners and others with knowledge of the proposals.

### **Summary of the Suffolk Coast & Heaths AONB Partnership response to National Grid Sea Link Statutory Consultation Oct to Dec 2023. It considers that:**

All proposals should adhere to all relevant policy.

Major new electricity transmission infrastructure should avoid nationally designated landscapes such as the Suffolk Coast & Heaths AONB.

Major new electricity transmission infrastructure should avoid the defined Suffolk Heritage Coast.

The Suffolk Coast & Heaths AONB has a very high sensitivity to development.

The proposed cable routes across the AONB may not be fully reinstated due to restrictions on vegetation and impacts on soil structures and drainage patterns.

The installation of underground cables through the AONB should be undertaken by Horizontal Directional Drilling (or similar) rather than trenching technology to avoid negative impacts on the nationally designated landscape.

The construction phase will have a negative impact on the ability of the AONB to deliver its statutory purpose such as from the construction of a transition joint bay within the AONB.

The proposed scheme needs to be considered in combination with other energy projects in the area. This includes consideration of dual consenting processes with other projects such as Lion Link, coordinating construction works such as cable routes and required infrastructure, construction timings and assessment of cumulative effects in a coordinated fashion of the multiple energy projects impacting east Suffolk and the AONB.

A collaborative approach should be taken to minimise negative impacts and to consider the public perception of the AONB, which may be related to energy projects rather than its statutory purpose of conserving and enhancing natural beauty.

The AONB Partnership consider that infrastructure of this magnitude does not contribute to the delivery of statutory purpose of the AONB.

Furthermore, it does not concur with the assessment in table 2.2.41 of the Preliminary Environmental Information Report Volume 1 Part 2 Chapter 2 starting on page 129. This section refers to 'small areas', 'removal of small sections of boundary features', 'expected to be localised', 'temporary period of time', 'localised tranquillity'.

The AONB Partnership consider that these phrases underplay the impacts on the nationally designated landscape from major construction activity. It considers that impact on part of the AONB is an impact on the AONB which it considers to be a single entity and that that impacts that are planned to happen for a 'short time' do not preclude the impacts impacting the AONB and by those experiencing the AONB.

The AONB Partnership consider that table 2.2.65 of Preliminary Environmental Information Report Volume 1 Part 2 Chapter 2 starting on page 182 section on Natural Heritage Features and Scenic Quality underplays the impacts from the installation of underground cables due to the likely impacts on vegetation from disruption to soil structure, drainage patterns and surface vegetation.

The AONB Partnership acknowledges that the project's proposer adheres to the draft EN-5 to underground cables through the AONB but considers there will still be a negative impact on the AONB during construction and operation.

The 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), as amended to reflect the Levelling Up and Regeneration Bill (2023), 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 **must seek to further the purpose of conserving and enhancing the natural beauty** [our emphasis] 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 must seek to further the purpose of conserving and enhancing the natural beauty AONB when undertaking its operations and decision making.

- E) The statutory Suffolk Coast & Heaths AONB Management Plan 2023-28 outlines within its 25 year vision for the area, it includes:

*Development contributes to the statutory AONB purpose and is designed to be an environmental exemplar. Nationally Significant Infrastructure Projects such as energy production and its associated infrastructure should seek to avoid damage to the natural beauty of the AONB. Where residual damage cannot be avoided this should be minimised, mitigated, and compensated for in so far as Development Consent Orders require.*

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 note that it published its 2023-28 management plan on 8 Dec 2023. This plan should be a material consideration in decision making on proposals that impact the nationally designated landscape.

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) **Convertor stations**
- iv) **HVAC cable routes**
- v) **Substation**
- vi) **Socio-economic impacts**

i) **Landfall**

The AONB Partnership note the landfall site in the proposals is 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. Landfall within the AONB will have a negative impact on its statutory purpose and natural beauty during construction.

ii) **HVDC cable routes**

The AONB Partnership notes that the proposed cable routes, where they cross the nationally designated landscape will be put underground as presumed in the draft National Policy Statement EN-5. It considers that there will be negative

impacts on the AONB during construction. It therefore considers that undergrounding cables through the AONB should be undertaken using Horizontal Directional Drilling (or similar) and not trenching technology to minimise negative impacts on the nationally designated landscape.

The AONB Partnership further considers that the impacts on surface vegetation and sub surface soil structures and drainage patterns during operation will potentially have a negative impact on the character of the AONB.

**iii) Convertor stations**

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 convertor station outside the AONB. It recognises the concerns of others that that will be significantly impacted by the location chosen and would urge the scheme proposer to address those concerns.

**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 is not located within the nationally designated landscape.

**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 a site within the nationally designated landscape.

**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.

Yours sincerely,



Simon Amstutz  
National Landscape (prev AONB) Manager

For and on behalf of the Suffolk & Essex Coast & Heaths National Landscape (prev  
AONB) Partnership  
simon.amstutz@suffolkandessex-nl.org.uk  
07971 909 649