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**Suffolk Coast & Heaths National Landscape Partnership response to:
Sea Link Consultation on Changes to Proposals: July to August 2024**

A note on nomenclature

Areas of Outstanding Natural Beauty, AONB, were rebranded as National Landscapes in November 2023, although the legal designation (and relevant policy), remains Area of Outstanding Natural Beauty. To reflect this change and the extension to the AONB in 2020, the Suffolk Coast & Heaths AONB Partnership has rebranded to the Suffolk & Essex Coast & Heaths National Landscape Partnership. The term National Landscape is used in this response refers to the legally designated Area of Outstanding Natural Beauty.

A note on this additional consultation response

This Suffolk & Essex Coast & Heaths National Landscape response is submitted by the staff team as it has not been possible to engage with the full Partnership in the timescales made available for the consultation.

It draws on discussions with key members of the Partnership and information made available from the Project's website: <https://www.nationalgrid.com/the-great-grid-upgrade/sea-link> including the Project update document (July 2024) and the interactive map.

The staff team were disappointed that the interactive map did not appear to have layers containing the National Landscape boundary or other environmental constraints to enable easier assessment of impacts.

This response should be read in conjunction with the Partnership's response to the statutory consultation (Oct to Dec 2023) dated 13 December 2023, that outlines the Partnership's position on the proposals.

It is worth noting that in the December 2023 response The Partnership considered that the proposals need to be considered in combination with other energy projects in the area. This includes assessment of the in combination impacts on the National Landscape as well as seeking opportunities to co-ordinate with other projects to minimise negative impacts.

It considered that there is a risk of public perception of the National Landscape being associated with major energy projects and not the AONB statutory purpose, to conserve and enhance natural beauty.

The staff team understands that the changed proposals, where they impact the National Landscape, can be described as:

- Onshore, an alteration to the cable route north of Aldeburgh, various changes to construction and maintenance access routes, compounds, and additional land for environmental mitigation and enhancement.
- Offshore, changes to the cable route, additional marine areas for construction vessel manoeuvring, and changes to the approach for backfilling marine trenches.

A note on policy

As outlined in the Partnership response of 2023, the staff team consider that the proposals should conform to all relevant local and national policies. Of note is the strengthening duty placed on statutory authorities, that National Grid as a statutory undertaker is, in section 245 of the Levelling Up and Regeneration Act (2023).

This strengthened duty requires statutory authorities to 'seek to further the purpose' of AONBs (that purpose being to conserve and enhance natural beauty)' in their decision making. Although guidance has yet to be published, interim opinion suggests that this duty is an active one and that it is the staff team's understanding that National Grid is required to demonstrate how it is meeting this strengthened duty.

The revised proposals

1. Revised route through the National Landscape.

While there may be some benefits to a reduced area within the 'red line' the staff team consider it necessary for the proposals to:

- Consider or further consider opportunities for co-ordination with other projects that are connecting in this area to minimise the area of the National Landscape impacted.

- Avoid areas of mitigation for other energy projects within the National Landscape.
- Consider that where the draft order limits for the underground cable route have been reduced this could have a restriction on the ability of the scheme to micro site the cables avoiding areas of unknown value (for example unrecorded important wildlife or heritage interests that become apparent when more detailed alignment work is undertaken).
- Consider any changes to construction compounds in or within the setting of the National Landscape impacts on defined AONB characteristic, for example tranquillity and light.
- Consider the impacts on the National Landscape from additional marine areas for construction vessel manoeuvring. The National Landscape staff team consider an assessment of what this means for impacts on the AONB should be undertaken for example if further impacts are likely and to what magnitude, have impact on factors including (but not necessarily limited to): landscape quality, scenic quality, relative wildness, and relative tranquillity.
- Consider facilitating infrastructure at the landfall in co-ordination with other projects using a similar landfall site to demonstrate the strengthened duty in Levelling Up and Regeneration Act (2023) and demonstrating a commitment to the mitigation hierarchy to reduce impacts on designated sites.
- That the 10% Biodiversity Net Gain that is proposed must be achieved through additional measures and not count any habitat creation or enhancement primarily to mitigate landscape and visual impacts .

Yours sincerely,



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