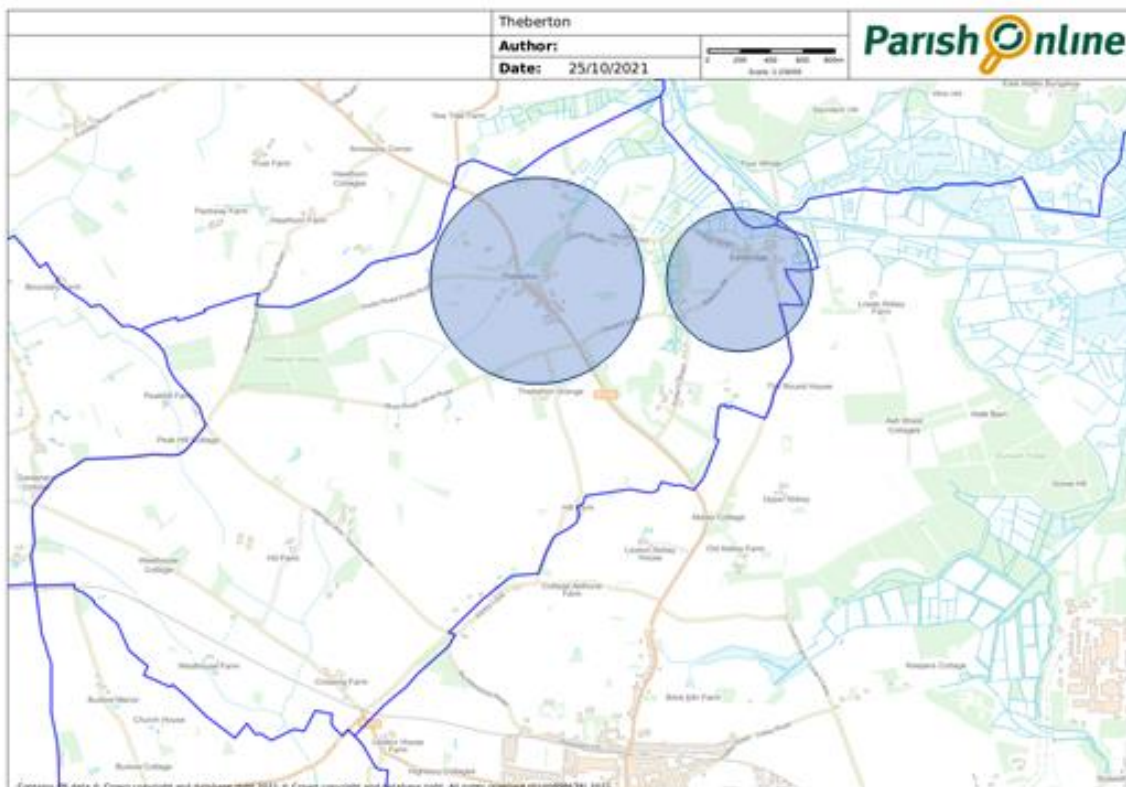


NATIONAL GRID VENTURES – SEA LINK INTERCONNECTOR NON_STATUTORY CONSULTATION

RESPONSE FROM THEBERTON AND EASTBRIDGE PARISH COUNCIL (T&EPC)

Introduction



Theberton

Theberton is a small village of approximately 170 people and 90 houses mostly straddling the B1122. It is about 4 miles north of the proposed Sizewell C (SZC) large twin reactor site. The proposed entrance to the main site will be approximately 1 mile from the village entrance sign. Within the village of Theberton there is St Peters Church, a Grade I listed thatched roof church with an unusual round tower, a Grade II listed public house, a village hall, two working farms, a cattery, a small business selling wild bird and other animal feeds, a small caravan park and other places to stay for visitors to enjoy the peace and quiet of the countryside. The successful village hall offers many activities and classes to the community and surrounding areas.

Eastbridge

Eastbridge is a tranquil hamlet of around 70 people and 40 houses nestled in a rural landscape with no street signs or speed limits. It borders the Minsmere River which cuts through an area of important wetland known as the Minsmere Levels forming part of the Minsmere - Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI), which is also the location of RSPB Minsmere Reserve. Within Eastbridge there is a public house, the Eels Foot Inn, a working farm, a certified and a basic campsite, for visitors to enjoy the peace and quiet of the countryside. Many local people and visitors enjoy the circular walk from Eastbridge to the Minsmere sluice to reach the Suffolk Heritage Coast and the sea returning through RSPB Minsmere or via National Trust's Dunwich Coastguards Cottages.

Both villages are chiefly agricultural, and people live there historically or by choice for the tranquility, dark skies, and the proximity to the Suffolk Heritage Coast. The two villages are linked by single track lanes with walks in the countryside characterised by open skies, arable and livestock farms, pheasants, partridge, owls, marsh harriers, buzzards, bittern, deer, bats and other wildlife. Residents and visitors enjoy the proximity to RSPB's flagship nature reserve at Minsmere with the Leiston Long Shop Museum, National Trust Dunwich Heath, Aldeburgh, Walberswick and Southwold within easy reach.

1. Response

- 1.1 We are dismayed that you have requested a scoping opinion from the Planning Inspectorate (PINS) before concluding your non-statutory consultation. The fact that this has happened shows that you have little regard for the input from local stakeholder councils or affected public. We understand that PINS questioned your intent in this regard, but you went ahead anyway, ignoring their concerns and advice.
- 1.2 Our major concern is that all the National Strategic Infrastructure energy projects should collectively minimize their onshore impacts on both the Area of Outstanding Natural Beauty, Heritage Coast and the National and International designated sites that overlap along the coastal strip and the inland rural/agricultural land to the west of the AONB and around Leiston, Saxmundham, Aldeburgh and the various outlying villages such as Theberton and Eastbridge.
- 1.3 We are very concerned at the opaque nature of the determination and assignment of connection points by National Grid Electricity Systems Operator (ESO), especially when this and the other two projects are being proposed by other National Grid companies, National Grid Electricity Transmission (NGET) and National Grid Ventures (NGV).
- 1.4 We are very concerned that the process for determining the point of connection for these projects, or other independent offshore windfarm projects, are not consulted upon or challengeable. In this case, it means that all three projects, Nautilus, Eurolink (both NGV) and Sea Link (NGET) are determined inside a single commercial entity offering no reasonable means of challenge by individuals, groups or local/national government.
- 1.5 We are very concerned that the whole process of determining connection points, rationalisation/coordination of converter station location, onshore or offshore on an "energy island", is not being determined strategically and subject to holistic review, especially when so large a proportion of our power requirements through offshore generation and power importation, through interconnectors, is expected to make landfall on the South East coast and in East Suffolk in particular.
- 1.6 We are very concerned that as each project is assigned a connection point individually as projects are brought forward, no holistic assessment of impacts of potential landfalls can be undertaken, which is clear even between this Sea Link project and the other two projects, Nautilus and Eurolink.
- 1.7 As a result, any serious attempt at long term coordination between projects or strategic planning for offshore to onshore connection simply cannot be achieved. Such an abdication of responsibility and the fact that, in this case, this is all contained within a single commercial enterprise, we find unacceptable.
- 1.8 We support the efforts by Therese Coffey MP to have a review of all potential landfall sites but are concerned that even if this review goes ahead, it will be too late to have any impact on the projects that are already being planned to make landfall in East Suffolk. This review needs to be undertaken swiftly but with a moratorium on existing and any future approvals for grid connections and consequential landfall planning, including for the three projects referred to above in 1.3.
- 1.9 We are also concerned that some of the optioneering in Suffolk for the landfall and converter stations is fanciful and would appear only to be there to justify the eventual preference.
- 1.10 The following response is therefore partially based on the [Scoping Report Opinion request](#) and cross referencing this now somewhat obsolete [consultation document](#).

- 1.11 Should Scottish Power's (SPR) EA1N and EA2 and the associated National Grid substation (NGS) not be approved, then T&EPC would have to withdraw these comments and reconsider any amended proposals in the light of such a decision.
- 1.12 Our concern with many of the suggested potential sites is the industrialization of the countryside around Leiston, Friston, Knodishall, Theberton and Saxmundham alongside the knowledge that with Nautilus and Eurolink also being considered and defined at this time, we have no guarantees that these projects will be progressed in a way that will be minimally damaging during development and with as sympathetic as possible impact on the landscape and local amenity once complete and operational.
- 1.13 Should the Nautilus Interconnector accept a landfall and connection on the Isle of Grain, the coordination between this project and Eurolink should be reviewed once more to ensure an appropriate coordination solution is achieved.
- 1.14 Under no circumstances should these three projects be allowed to progress individually to inflict sequential and geographically separate solutions for their connections into the Sizewell to Bramford power lines, whether or not the Friston SPR/NGS project is finally approved following a Judicial Review decision.

2. Siting and Cable Routes

- 2.1 On the assumption that EA1N, EA2 windfarm and NGS north of Friston are approved and constructed, we feel that any Sea Link converter station and links from the shore and to the NGS from the converter station should minimize the spread of infrastructure and length of cable routes as far as possible.
- 2.2 On the assumption that EA1N/EA2 and the NGS are approved, whilst only one of the converter substation sites, option C, lies within the T&E Parish boundary, option A (very close to T&E Parish boundary) is now impractical considering this is on land destined to be part of the construction site and marsh harrier mitigation for Sizewell C, having now had approval by the Secretary of State (subject to challenge and financial agreements). Option B is partially within the AONB, has conflicts with the proposed Sizewell C (SZC) Caravan site/early years rail head and park & ride facility and is in contravention of National Grid's [Horlock](#) rules for substation siting, although both Greater Gabbard and Galloper wind farms already have substations in this area.
- 2.3 Options G, H and I require unnecessarily long cable corridors as both pass the westward extent of the Friston substation site, are also west of the East Suffolk train line and, in the case of G, west of the A12 which would add complications to any cable trench development.
- 2.4 Landfall S5 is simply unacceptable as it crosses into the Minsmere and Walberswick Coast and Heaths SSSI and potentially the Minsmere Ramsar designation. It is highly unlikely that suitable land would be available at this location for a buried marine to terrestrial cable junction without significant impacts to the Heritage Coast, Minsmere Ramsar, SAC and SSSI designations. Further inland, there are conflicts with the SZC development and some of the associated cable corridor proposals are across marsh where it is known that peat depths reach up to 10 metres in places and much of this marsh land is designated, as referred to above.
- 2.5 Landfall S4 seems to include a significant proportion of the existing Sizewell A site and much of the remaining area is either Sizewell Marsh SSSI or land that is being developed as part of the Sizewell B facilities relocation project and its associated planting and ecological mitigation schemes. So, such an aspiration seems to be completely inappropriate.
- 2.6 Landfall S1 at Aldeburgh Marshes through a coastal frontage just south of Aldeburgh, that is under considerable stress from erosion, and so close to Aldeburgh itself, was always going to be inappropriate, even before you consider the cable route to any converter station crossing the Alde twice and going through a number of designated landscapes including both SSSI and Ramsar sites.

- 2.7 If the site for the Sea Link Interconnector converter station is settled before the other two projects come forward, it should have sufficient potential capacity to accommodate both the Nautilus and Eurolink converter stations also.
- 2.8 Cable routes for these two or three projects should be developed simultaneously to avoid multiple disruptions through sequential cable corridor excavation and construction.
- 2.9 Site A is totally contained within the AONB, thus breaching the Horlock rules and is very close to SZC construction site with access likely to be extremely difficult, if not impossible during any SZC construction period. It would also have enormous, permanent landscape visual impact and protected species disturbance as a site next to and overlooking Minsmere, with all of its designations.
- 2.10 Site B is in the AONB, thus breaching Horlock rules.
- 2.11 Site D is much closer to Friston substation than Sizewell but the cable corridor would have significant issues negotiating SZC developments such as the green rail route into the construction site and crossing the Aldhurst Farm mitigation site.
- 2.12 Site C is roughly equidistant from Sizewell and Friston but once again conflicts with any SZC development are likely to make this siting and return connection to Sizewell problematic.
- 2.13 Whilst many of the converter station sites have some level of existing natural screening, most are in relatively flat countryside with little hope of developing screening in a reasonable timeframe given the 24-30m high converter buildings.
- 2.14 The preferred and alternative choices of Site 1 and 3 for the coordinated converter stations are outside of the AONB, but also in a relatively flat landscape and adjacent woodland screening is unlikely to provide much mitigation for these tall buildings, especially considering the 10-15 hectare footprint of such a development.
- 2.15 Site 1 sits on the top of a rise north of the A1094 and will be easily visible from Knodishall, as the nearest significant residential area.
- 2.16 Site 3 is above the Fromus valley. Existing screening to the west is unlikely provide complete screening and, from North, East and South the flat terrain has no screening whatsoever and it will take decades to provide any significant mitigation.

The following sections refer to the [Scoping Opinion documents](#) but considering the fact that none of these subjects are covered in the non-statutory consultation document, they have been left in for information and are nonetheless relevant to any future statutory consultation.

3. Traffic and Transport

- 3.1 The discussion of site 3 at 2.1.8.9 and the possibility of a temporary connection to the B1121 across the Fromus, reignites a discussion once again of the missed opportunity of a SZC Route D2 relief road, originally proposed during the Sizewell B construction and raised during the Sizewell C consultations and Development Consent Order consideration by the Planning Inspectorate. This would have connected to the B1122 at the proposed SZC site entrance, between Leiston and Theberton, from the A12, slightly north of the B1121 junction to Saxmundham.
- 3.2 It is unfortunate that more significant coordination between Scottish Power, and the three National Grid projects and the Sizewell C project were not properly entertained at an earlier date. The lack of forward planning for all this land-based infrastructure and power generation will result in unnecessary disturbance for the local population, damage to the tourist economy, the countryside and general amenity of this area over many years as a result.

- 3.3 Had D2 been properly assessed by considering all of these projects collectively, a Sizewell Link Road (SLR) that sends all HGV and AIL along the direct D2 route rather than around two sides of a 5–6-mile sided triangle halving the resultant carbon emissions.
- 3.4 The D2 route would also have significantly improved access to the two wind farm substation sites and these three National Grid interconnector sites rather than being significantly constrained by the inadequacies of the A1094, B1121 and B1119. All of these issues were raised at both the Scottish Power and Sizewell Development Consent Order applications, but once again the folly of this piece-meal approach shows its shortsightedness.
- 3.5 Whilst the Site 4 (C) converter station site may benefit from the proposed SLR, assuming the construction is completed in time, even that will be constrained by the B1122 and country lanes should the SLR not be ready in time. If the SLR is ready in time only one crossing roads in the Theberton area will be available for access at Pretty Road as Moat Road access from the B1122 will be closed.
- 3.6 It has been accepted into the SLR plan that a bridge across the SLR will be constructed on Pretty Road. However, it is not clear if this bridge will be of sufficient standard to accommodate large AILs and with no right turn off the SLR on to Moat Road access to Site 4 may not be possible.
- 3.7 Access to Pretty Road and the bridge will have to be by exiting the SLR at the B1125 junction, turning right on to the B1122 and then right again into Pretty Road at a challenging blind bend on the B1122.
- 3.8 Section 2.8 Traffic and Transport (2.8.1.4) refers to Figure 2.8.1 Proposed Study Area in Suffolk (Traffic & Transport). The boundary to the north near Theberton stops at the crossroads on the B1122 junction with Moat Road and Onners Lane. Restricting the boundary to this point is not appropriate as Moat Road will be closed due to the construction of the SLR and the only access to the SLR at Moat Road will be from the west, close to the junction with George Road, that goes south past Theberton Grange. This will be one way to Yoxford only.
- 3.9 As previously stated in 3.5, access to site 4 would only be possible via Pretty Road and across a new bridge, which almost certainly will not be robust enough for any large transformer transports required during the build or during operational maintenance.
- 3.10 The study area boundary and key local junctions list (2.8.3.5) needs to be extended north to include the proposed junction of the B1125 with the proposed SLR, B1125 junction with the B1122 (both before and after the SLR is operational) and ensure that the SLR impacts are fully understood for both the construction period and operational period.
- 3.11 Whilst converter station site 4 seems unlikely to become a preferred or alternative site for the project, the impact of the SLR needs to be fully appreciated both during construction and once operational.
- 3.12 Paragraphs 2.8.3.1 and 2.8.3.4 describe Leiston as a village! This is disappointing as Leiston has a Town Council and a population of around 4,600 which is still expanding as new housing estates are completed and should not be considered as a village anywhere in this Scoping Report. Such inappropriate descriptions will tend to lessen the perceived impact of any construction or operational impacts on Leiston.
- 3.13 It is surprising that the whole of the B1122 between Leiston and Yoxford as well as the SLR proposals are not being included in the boundary as the B1122 is the only approved HGV route for AILs in the area. This was recognised by the recent Scottish Power wind farm and Sizewell C proposals. In the case of the Scottish Power wind farm, it was also recognised that the A1094 is unsuitable for AIL deliveries because of the rail bridge just east of the junction with the A12. For this reason, the boundary should be extended to the full length of the A1094 and its junction with the A12.
- 3.14 Similarly, the western extent of the boundary doesn't include the junction of B1122 and B1119 in the centre of Saxmundham, which may be critical for Site 3 access should no temporary access be developed across the Fromus south of Saxmundham. This traffic light-controlled

junction is significantly constrained and there is also a bridge across the Fromus on the B1119 close to the church which should be assessed.

- 3.15 Paragraph 2.8.7.19 should include a reference to the SZC development of the SLR and potential Sea Link impacts during its construction, as well as the impacts of an SLR once complete and operational both on the Sea Link project construction/development and its operation.

4. Air Quality, Cumulative Impacts and Biodiversity

- 4.1 Given the above comments regarding the Traffic and Transport section boundaries and the comments above, it is surprising that the Air Quality only refers to Figure 1.1.2 Suffolk Onshore Scheme Scoping Boundary as this only covers the areas for the landfall, cable swathes and converter station sites. Air quality impacts should be assessed for the entire Transport and Traffic boundaries once finalized and given the A12 is the only major access route to this area of East Suffolk should probably have some level of assessment for traffic coming from both the North, to the Yoxford junction with the B1122, and from the South, to the junction with the A1094.
- 4.2 Cumulative impacts with the three approved projects (two Scottish Power wind farms and Sizewell C) as well as potential cumulative impacts with Eurolink and Nautilus also need to be included in both the Traffic and Transport and Air Quality sections.
- 4.3 It is pleasing, and appropriate, to see a commitment to 10% Biodiversity Net Gain (BNG) (2.3.2.6) regardless of the provisions in the Environment Act 2021 and the expected legislation for mandatory 10% BNG in 2023 and for the project being supportive of the DEFRA Biodiversity 2020 strategy (2.3.2.9)
- 4.4 Birds section (2.3.2.26) is missing a reference to Stone Curlew that nests within Minsmere Reserve.

5. Conclusion

This response, to the Non-Statutory Consultation and sections of the Scoping Report not covered by the consultation request for the Sea Link Interconnector, has identified that neither document properly identifies insufficient coordination between the three National Grid projects. Also, the full scope of potential impacts are not being realised, because of inappropriate restriction of some assessment boundaries and by incomplete appreciation of the extent and cumulative impacts of the two Scottish Power wind farm projects, the Sizewell C project and the other two National Grid projects.

Whilst there are welcome words about cooperative development for the three interconnector projects, cumulative impact statements and assessment boundaries are inconsistent and often too restrictive which will result in an incomplete appreciation of the cumulative and development organisational impacts of the three, already approved, National Strategic Infrastructure projects.

Whilst we understand the National need for expanding both offshore wind and improving the interconnectedness both within the UK and between the UK and neighbouring countries across the North Sea, such developments need to be undertaken in a sympathetic and coordinated manner, especially when their timeframes are so closely defined, and all three projects, Sea Link, Nautilus and Eurolink, are within the overarching responsibility of National Grid.

If this is not addressed adequately by National Grid during the development of the Sea Link assessment plan and similarly by the associated Eurolink and Nautilus assessment plans, the result will be significant repeated disruption and damage to the coastal environment of East Suffolk which is host to Suffolk Coast and Heaths AONB, Heritage Coast and significant International and National designations.

It is unacceptable for these three projects to be progressed individually, they must be fully coordinated, along with other wind farm landfalls and proposals to minimize disruption and damage to the area.

We are surprised and dismayed that no options are considered for these three projects to go to more appropriate locations, given that the main requirement for power seems to be in the London area or for connection to the interconnectors to France that are in Kent.

Indeed, if alternative connections to the grid closer to London and Kent had been considered and assessed, then the need for a Sea Link connection between Suffolk and Kent may significantly reduce. We remain concerned that a second connector between Suffolk and Kent is still in National Grid's considerations for the future and that the current inadequate assessments and options simply do not consider these possibilities.

There has been increasing discussions about brownfield sites close to London, common connections to the proposed landfalls and substations in Essex for Five Estuaries and North Falls, other brownfield sites such as Bradwell and the possibility of an "energy island" to situate converter stations, but none of this appears in these consultation documents, and some appear not to have even been researched by National Grid and its subsidiaries.

We are concerned that these proposals simply do not consider the wider potential opportunities to create a more coordinated and less impactful result for East Suffolk.

National Grid should review all these projects holistically, as well as other wind farm connections and work towards an acceptable solution for the East of England and the UK as a whole.

Until such a holistic review is undertaken transparently, consulted upon and an acceptable coordinated outcome agreed, this, and the other projects being proposed by National Grid companies, should be suspended.