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# **SCOPING OPINION:**

## **Proposed LionLink Multi-purpose Interconnector**

**Case Reference: EN020033**

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Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

**16 April 2024**



## TABLE OF CONTENTS

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2.</b>	<b>OVERARCHING COMMENTS .....</b>	<b>3</b>
2.1	Description of the Proposed Development .....	3
2.2	EIA Methodology and Scope of Assessment .....	12
<b>3.</b>	<b>ENVIRONMENTAL ASPECT COMMENTS .....</b>	<b>15</b>
3.1	Onshore: air quality .....	15
3.2	Onshore: agriculture and soils .....	17
3.3	Onshore: ecology and biodiversity.....	20
3.4	Onshore: geology and contamination.....	25
3.5	Onshore: health and wellbeing .....	30
3.6	Onshore: historic environment.....	33
3.7	Onshore: hydrology, hydrogeology and drainage.....	36
3.8	Onshore: landscape and visual .....	43
3.9	Onshore: noise and vibration.....	46
3.10	Onshore: traffic and transport .....	48
3.11	Onshore: socio-economics, recreation and tourism .....	51
3.12	Onshore: material assets and waste .....	54
3.13	Offshore: marine physical environment.....	56
3.14	Offshore: intertidal and subtidal benthic ecology .....	63
3.15	Offshore: fish and shellfish.....	68
3.16	Offshore: intertidal and offshore ornithology .....	73
3.17	Offshore: marine mammals and marine reptiles .....	80
3.18	Offshore: shipping and navigation .....	84
3.19	Offshore: commercial fisheries .....	85
3.20	Offshore: other marine users.....	87
3.21	Offshore: marine archaeology.....	90
3.22	Scheme wide: climate change .....	92
3.23	Scheme wide: major accidents and disasters .....	95
3.24	Scheme wide: cumulative and combined effects of the project .....	96

### **APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED**

### **APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES**

# 1. INTRODUCTION

1.0.1 On 06 March 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid LionLink Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed LionLink Multi-purpose Interconnector (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

**Scoping Report - Main Text**

<http://infrastructure.planninginspectorate.gov.uk/document/EN020033-000046>

**Scoping Report – Onshore Figures (Figures 1-1 to 17-2)**

<http://infrastructure.planninginspectorate.gov.uk/document/EN020033-000048>

**Scoping Report – Offshore Figures (Figures 18-1 to 29-1)**

<http://infrastructure.planninginspectorate.gov.uk/document/EN020033-000047>

**Scoping Report – Appendices**

<http://infrastructure.planninginspectorate.gov.uk/document/EN020033-000049>

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with

copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

- 1.0.6 The Inspectorate has published a series of advice notes, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:  
<https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>
- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

## 2. OVERARCHING COMMENTS

### 2.1 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraphs 1.1.5, 1.6.2, 2.1.2, 2.3.53, 2.4.5 to 2.4.6	Optionality	<p>The Scoping Report describes two options for landfall (Southwold or Walberswick), two options for routing of the offshore cable (Route B and Route C, as shown on Figure 1-4, Onshore Figures) and two options for the onshore cable corridor (a common search corridor, plus a Southwold corridor or Walberswick corridor, as shown on Figure 1-3, Onshore Figures). The location of the proposed converter station is also to be determined, with an area of search shown on Figure 1-3, Onshore Figures.</p> <p>The Applicant expects that only one option will be taken forward in the development consent order (DCO) application for each element of current optionality.</p> <p>The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. The need and justification to support the level of flexibility sought must be explained in the ES, including how it has been taken into account in the assessments through relevant parameters (temporal and spatial) and a defined worst-case for resulting environmental effects. It will be essential to ensure consistency throughout the ES and any other relevant assessments supporting the application from which the ES draws. It should be noted that if the Proposed Development materially changes</p>

ID	Ref	Description	Inspectorate's comments
			<p>prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.</p>
2.1.2	<p>Paragraphs 2.3.3 to 2.3.36 and 5.4.5</p>	<p>Consenting scenarios</p>	<p>The Scoping Report describes several consenting scenarios that could form part of the DCO application in respect of certain components of the Proposed Development, including the proposed Friston substation, converter station, and underground cables (onshore and landfall). It is stated that this arises as a result of potential coordination/ co-location with other planned development such as Sealink and Nautilus interconnector projects and East Anglia One North (EA1N) and East Anglia Two (EA2) offshore windfarms.</p> <p>The ES should clearly describe each consenting scenario that could be authorised through the dDCO and confirm the maximum or worst-case parameters as relevant to each environmental aspect, with justification as to why it represents the worst-case. The ES should provide an assessment of likely significant effects arising from each consenting scenario. It should identify the mitigation proposed to address likely significant effects.</p> <p>For consenting scenarios where coordination with other projects is not proposed (or one of the other projects would deliver part of the Proposed Development infrastructure), an assessment of any likely significant cumulative effects arising from construction and operation of the Proposed Development and the other projects should be provided in the ES.</p> <p>It should be clear how the maximum parameters used in the ES assessment and selection of the delivery option for each consenting scenario would be secured through the draft DCO (dDCO).</p>
2.1.3	<p>Paragraphs 1.6.1, 2.4.1 and 2.4.23</p>	<p>Cable protection</p>	<p>The Scoping Report states that external cable protection may be required for the offshore components, for example where cables cross existing third party assets or where full burial is not achieved.</p>

ID	Ref	Description	Inspectorate's comments
			The ES should explain why target depths may not be achievable. It should detail the maximum volume of material required for cable protection and explain how this has been quantified.
2.1.4	Chapter 2, various	Land required for mitigation and temporary access	The Scoping Report indicates in several places in Chapter 2 that land requirements for mitigation are not included in the description of permanent land take for components of the Proposed Development. Assessment in the ES should be based on the full land extent, including any permanent easements required for operation maintenance.
2.1.5	Paragraphs 2.4.24 and 2.4.26	Vessel movements	The Scoping Report describes the type of vessels that might be required during construction. The ES should also provide this information for the operational phase, for example arising from maintenance or repair activity as described at paragraph 2.4.26 of the Scoping Report. It should detail the expected number, type and frequency of vessel movements required to construct, operate and decommission the Proposed Development. If these are unknown, then the ES should explain the assumptions that have been made about vessel movements to inform assessment.
2.1.6	Paragraphs 2.3.48 and 9.5.4	Cable landfall	<p>The ES assessment of potential environmental effects of the cable landfall installation should consider anticipated changes at the coastal site throughout the lifetime of the Proposed Development. The assessment should address vertical change in beach profile and effects from coastal retreat, noting that both potential landfall sites are subject to coastal erosion. The ES should describe how cable burial and siting of associated infrastructure will be managed throughout the lifespan of the Proposed Development.</p> <p>The Inspectorate notes that a separate technical report on ground stability at the landfall sites would be prepared. This should be used to inform the assessment and appended to the ES.</p>

ID	Ref	Description	Inspectorate's comments
2.1.7	Table 2-8 and paragraphs 2.3.52, 2.3.69 to 2.3.70, and 2.3.86	Onshore and landfall underground cable installation method and crossings	<p>As landfall and onshore component locations have yet to be confirmed, it is not yet clear whether any temporary or permanent crossings of watercourses, major roads and/ or railways would be required. The Scoping Report explains that cable installation could use a range of methods including open cut trenching or trenchless crossings eg pipe jacking, horizontal directional drilling (HDD) and micro boring. It is stated that trenchless methods would be used where open cut trench is not viable; Table 2-8 confirms that HDD would be used at the landfall location although paragraph 2.3.86 of the Scoping Report suggests that the specific technique has yet to be decided.</p> <p>The ES should identify the location and type of all crossings within the onshore cable corridor and at the landfall, as well as the nature of any associated construction works (eg dewatering, trenching and HDD). Any requirement for open pits and use of heavy plant on the beach, which could affect coastal geomorphology and ecology, eg protected vegetated gravel habitat, should be identified. The ES should describe any likely significant effects arising from these activities.</p> <p>Where reliance is placed on the use of a specific method to mitigate significant effects, the Applicant should demonstrate that the method is feasible, through assessment based on robust baseline data, and that such commitments are appropriately defined and secured.</p> <p>The Applicant's attention is drawn to the comments of NE (Appendix 2 of this Opinion) regarding failure of HDD on other projects and the need for sufficient geotechnical information to demonstrate feasibility. This should be addressed in the feasibility work as proposed at paragraph 2.3.52 of the Scoping Report.</p>
2.1.8	Tables 2-1, 2-2 and 2-5	Onshore building parameters	<p>The Scoping Report identifies the maximum number of buildings and total footprint for built development and maximum building heights at the proposed Friston substation and converter substation sites. The</p>



ID	Ref	Description	Inspectorate's comments
			<p>ES should clearly set out the worst-case parameters for assessment, in particular in relation to landscape and visual impacts.</p> <p>The Applicant's attention is drawn to the comments from Historic England (Appendix 2 of this Opinion) regarding below ground impacts at the proposed substation and converter station sites. The ES should confirm maximum parameters/ worst case for activity below ground.</p>
2.1.9	Paragraph 2.3.58	Temporary construction compounds	<p>The ES should describe the proposed number, location and parameters of temporary construction compounds required during construction and decommissioning of the Proposed Development, for each of the consenting scenarios. The ES should assess any likely significant effects arising from these works.</p>
2.1.10	Paragraphs 2.3.76 to 2.3.80	Temporary access routes and vehicle movements during construction	<p>The Scoping Report describes that temporary access roads will be required and that a temporary haul route is proposed. Temporary watercourse crossings may also be needed to facilitate the route.</p> <p>The ES should describe the location and parameters of temporary access routes, including any changes proposed to existing highway, and confirm the predicted number/ type of traffic movements. Where details are not known, a worst-case should be presented.</p>
2.1.11	2.4.9	Cable burial risk assessment (CBRA)	<p>The Scoping Report states a CBRA would be used to inform the assessment. Effort should be made to agree the scope and method of the CBRA with relevant consultation bodies. The CBRA should be submitted as an appendix to the ES.</p>
2.1.12	Paragraphs 2.3.89 to 2.3.90	Duct ends and cofferdam for trenchless exit point	<p>The Scoping Report describes that duct ends may be capped and exposed offshore for up to one year; it is stated that the duct ends might be ballasted using temporary deposits eg rock bags, concrete mattresses or similar. It states that a cofferdam might be required at the exit point, if excavation needs to be carried out in dry conditions.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The ES should provide a description of these components, including the locations where they would be used. It should provide any assessment of likely significant effects arising from these activities, where these could occur, based on a worst-case scenario.</p>
2.1.13	<p>Paragraphs 2.3.105, 2.4.29 to 2.4.32 and 5.4.17 to 5.4.18</p>	Decommissioning	<p>The Scoping Report states that for onshore components <i>"decommissioning would be separately assessed at the time of that consent application"</i> due to the life expectancy of the Proposed Development and expected approach to decommissioning. For offshore components, it states that the <i>"environmental impact can... not be fully assessed until the environmental conditions at the time of decommissioning are established."</i></p> <p>The Inspectorate acknowledges that the further into the future any assessment is made, the less reliance may be placed on the outcome. However, the purpose of such a long-term assessment is to enable the decommissioning of the works to be considered in the design and use of materials such that infrastructure can be removed with the minimum of disruption. The Inspectorate considers that a high-level environmental assessment of the decommissioning of the Proposed Development should be provided in the ES. The assessment should provide information about the predicted future baseline which has been applied to the assessment of decommissioning effects, for example potential for effects on the water environment based on future scenarios which consider climate changes.</p> <p>Paragraph 5.4.17 of the Scoping Report states that it is anticipated that parts of the Proposed Development would be replaced to extend the operation beyond the minimum 40-year design life. The ES should provide a description of anticipated works to facilitate any proposed extension of the lifespan of the Proposed Development, including any comprehensive component refurbishment, and likely significant effects arising from such works should be assessed.</p>

ID	Ref	Description	Inspectorate's comments
2.1.14	Paragraph 2.4.17	Unexploded ordnance (UXO) clearance	<p>The Scoping Report states that consent for UXO detonation would be sought via a separate Marine Licence application, supported by a more detailed assessment using information from a pre-installation magnetometer survey. It is stated that UXO detonation would not be considered in the EIA.</p> <p>The Inspectorate understands that the number, type and size of UXO devices is not known at this stage. The Inspectorate advises that the ES should still include a high-level assessment in relevant aspect chapters based on a likely worst-case scenario (any assumptions used in the definition of the worst-case scenario should be explained in the ES). The ES should address any cumulative effects from the construction of the Proposed Development with the likely effects from the UXO clearance.</p>
2.1.15	Paragraph 2.4.19	Footprint of seabed disturbance	<p>The Scoping Report describes the expected seabed preparation activity that would be required, including confirmation that the volume of sand and disposal location arising from any pre-sweeping of sand waves would be identified. The ES should also identify the worst-case footprint of seabed disturbance that would arise from offshore construction activities.</p>
2.1.16	Section 3.3	Reasonable alternatives	<p>The Scoping Report describes the Applicant's options' appraisal, including strategic options for connection points to the National Grid Electricity Transmission System and TenneT infrastructure.</p> <p>The EIA Regulations require that the Applicant provide '<i>A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.</i>'</p>

ID	Ref	Description	Inspectorate's comments
			<p>The Inspectorate acknowledges the Applicant's intention to provide a detailed description of siting and routing options appraisal process in the ES as stated in paragraph 3.1.1 of the Scoping Report. The Inspectorate would expect the ES to provide details of the reasonable alternatives studied and the reasoning for selection of the chosen option(s), including a comparison of the environmental effects. Technical studies or feasibility work produced to support the appraisal process should be summarised or appended to the ES.</p>
2.1.17	Section 3.3	<p>Connection points with National Grid Electricity Transmission (NGET) and TenneT infrastructure</p>	<p>The Scoping Report identifies that the Proposed Development proposes connection with several other proposed and/ or planned infrastructure projects including a proposed substation at Friston, which may be delivered as part of the East Anglia 1 North (EA1N) and East Anglia 2 (EA2) DCOs, and Dutch offshore wind farms.</p> <p>The ES should describe the relationship between the Proposed Development and any connected projects, including through use of diagrams/ figures. This should include the extent to which the Proposed Development is dependent on their delivery and the development timelines of other projects (including the predicted lifespans once operational), with an explanation of how these will be coordinated to reduce environmental effects. Any assumptions made about connected projects should be explained, together with any uncertainty remaining and how this is addressed in the assessment.</p> <p>The Applicant's attention is drawn to the comments of East Suffolk Council (ESC) (Appendix 2 of this Opinion) about the proposed substation. ESC states that the EA1N and EA2 DCOs provide flexibility for either an air-insulated substation (AIS) or gas-insulated switchgear (GIS) substation but the Proposed Development appears to commit to a GIS substation (paragraph 2.3.6 of the Scoping Report). The ES should provide clarification on this point. Where</p>

ID	Ref	Description	Inspectorate's comments
			potential optionality for the technology remains, the ES should include an assessment of the worst-case as relevant to each aspect.
2.1.18	Paragraphs 18.5.4, 19.5.4, 20.5.4 and 21.5.4 and Tables 18-4, 19-5 and 20-8	Offshore waste and disposal sites	<p>The Scoping Report states that sediment from pre-sweeping activities is proposed to be disposed immediately alongside the offshore cable corridor or at a separate disposal location. For drilling fluids, it is stated that these would be tested to determine possible reuse or transportation by licenced courier to a licensed waste disposal site. It is unclear whether a site waste management plan (SWMP) is proposed for management and disposal of offshore waste.</p> <p>The ES should clearly identify the quantities of dredged material and other waste, and likely method and location for disposal. Any likely significant effects from offshore waste collection and disposal, including dredging or dredge disposal, should be assessed.</p>

## 2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 5)

ID	Ref	Description	Inspectorate's comments
2.2.1	Paragraph 1.6.2 and Section 2.3	Effects to the intertidal area	<p>The Scoping Report states that the intertidal area will be assessed as part of the onshore and offshore chapters of the EIA. The ES should clearly describe likely significant effects to the intertidal area in the relevant aspect chapters. There should be no gap in the assessment arising from the ES structure of onshore and offshore aspects; similarly, cross-reference can be used to avoid duplication or double-counting within the assessments.</p>
2.2.2	Paragraph 5.7.1	Transboundary	<p>It is noted that the Scoping Report includes consideration of potential transboundary effects in relation to the following aspects:</p> <ul style="list-style-type: none"> <li>▪ marine physical environment;</li> <li>▪ intertidal and subtidal benthic ecology;</li> <li>▪ fish and shellfish;</li> <li>▪ intertidal and offshore ornithology;</li> <li>▪ marine mammals and marine reptiles;</li> <li>▪ shipping and navigation;</li> <li>▪ commercial fisheries; and</li> <li>▪ marine archaeology.</li> </ul> <p>The Inspectorate notes that paragraph 5.7.1 states that a screening matrix for transboundary impacts will be provided in the ES.</p> <p>The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary effects, and if so, what these are, and which EEA</p>

ID	Ref	Description	Inspectorate's comments
			States would be affected. The Inspectorate will undertake a transboundary screening on behalf of the SoS in due course.
2.2.3	Section 5.8	Additional mitigation/ control measures	<p>The Scoping Report states that additional mitigation to meet existing legislative requirements, or considered to be best practice, would be identified in ES aspect chapters. It is stated that where it can be demonstrated that mitigation is secured, it would be considered in the initial assessment of likely significant effects.</p> <p>The Inspectorate would expect such control measures to be set out in management plans, outline or draft versions of which should be submitted with the DCO application. Based on information in the Scoping Report, this should include (but is not limited to):</p> <ul style="list-style-type: none"> <li>▪ Construction traffic management plan (CTMP) (paragraph 2.3.81).</li> <li>▪ Soil resources management plan (SRMP) (paragraph 7.5.6) (proposed to be part of the CEMP).</li> <li>▪ Emergency Response/ Spill Plan (paragraph 9.5.5).</li> <li>▪ Materials management plan (MMP) (paragraph 9.5.5).</li> <li>▪ Construction environmental management plan (CEMP) (Table 9-2).</li> <li>▪ Code of construction practice (CoCP) (Table 9-2).</li> <li>▪ Onshore (SWMP) (paragraph 17.5.3).</li> <li>▪ Construction code of practice (CoCP) (paragraph 18.5.4).</li> <li>▪ Biosecurity plan for marine invasive non-native species (MINNS) (paragraph 18.5.4).</li> </ul>
2.2.4	N/A	Embedded/ design measures	For each aspect, the Scoping Report describes design measures that would be considered to minimise effects. The ES should include a full description of proposed design measures that are relied upon to avoid or minimise likely significant effects. It should explain how the

ID	Ref	Description	Inspectorate's comments
			measures would be secured and implemented, including in the context of any flexibility that is sought in the dDCO. It should describe any engagement that has been held about design measures, including for example with affected landowners, and whether agreement has been reached.
2.2.5	Paragraph 19.5.3	Offshore electro-magnetic fields (EMF) assessment	The Scoping Report states that a full offshore EMF assessment will be undertaken during the detailed design phase. It is unclear whether this would be available to inform the impact assessments for relevant aspects, including intertidal and benthic ecology and fish and shellfish. The Inspectorate advises that there should be sufficient information available to inform the assessment and any design measures proposed as a means of avoiding, minimising or reducing likely significant effects. Any such measures should be described in the ES and demonstrably secured through the dDCO.



### 3. ENVIRONMENTAL ASPECT COMMENTS

#### 3.1 Onshore: air quality

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6-3 and paragraph 6.725	Vehicle emission impacts on ecological and human receptors during operation	The Inspectorate agrees that it is unlikely that there would be a significant change in vehicle flows during operation and therefore it is also unlikely that significant effects would occur in respect of air quality. The ES should confirm that the anticipated road vehicle movements are below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) screening values and provide the outcome of the operational screening assessment. Should the screening values be exceeded then an assessment of likely significant effects should be provided.

ID	Ref	Description	Inspectorate's comments
3.1.2	Paragraphs 6.71 to 6.7.2	Selection of receptors	The criteria and professional judgement used to identify human and ecological receptors within the air quality study area should be clearly described in the ES. The ES should present a justification for any ecological sites within the study area that are excluded from the assessment based on relevant guidance. This should be done in consultation with the relevant consultation bodies.
3.1.3	Table 6-1 and paragraph 6.7.3	Baseline data sources	The Applicant states that it is not proposed to collect any primary air quality data. It is proposed that the baseline description will be informed by a desk study, which draws upon monitoring by the

ID	Ref	Description	Inspectorate's comments
			<p>relevant local authority and Department for Environment, Food and Rural Affairs (DEFRA) projected background concentrations.</p> <p>Effort should be made to agree the requirement for any additional baseline survey data with the relevant consultation bodies. The assessment in the ES should be carried out with reference to a robust baseline position reflecting the relevant study area, including an understanding of relevant pollutant concentrations. Where required, further monitoring should be conducted to supplement available data from the local authority monitoring.</p> <p>The Applicant's attention is drawn to Natural England's (NE) comments (Appendix 2 of this Opinion) regarding the Air Pollution Information Source (APIS). The Applicant should consider use of APIS as a data source to identify the sensitivity of habitats and features of designated sites.</p>
3.14	N/A	Study area/ air quality management areas (AQMA)	<p>The ES should include a figure(s) to identify the final study areas for each element of the air quality assessment, including the location of human and ecological receptors that have been considered. The location and extent of any AQMAs within or in proximity to the final study areas should be provided on a figure.</p> <p>The Applicant's attention is drawn to ESC's comments (Appendix 2 of this Scoping Opinion) regarding the Suffolk Coastal District Council AQMA No.3. The ES should confirm whether there are any relevant AQMAs likely to experience impacts from air quality change as a result of an increase in traffic on the affected road network (ARN).</p>

## 3.2 Onshore: agriculture and soils

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paragraph 7.4.4	Effects to agricultural land from EMF generated by electrical equipment during operation	<p>The Scoping Report states that EMF effects are not expected and that an EMF assessment would be undertaken as part of the scheme design for the Proposed Development.</p> <p>The Inspectorate agrees that it is unlikely that significant effects would occur, assuming the Proposed Development complies with relevant EMF guidelines in its operation. The EMF assessment should be submitted with the DCO application to demonstrate how this would be achieved. On that basis, the Inspectorate agrees that this matter can be scoped out of the assessment.</p>
3.2.2	Table 7-2	Effects to agricultural land during operation	<p>The Inspectorate agrees this matter can be scoped out on the basis that:</p> <ul style="list-style-type: none"> <li>▪ the agricultural land to be permanently lost will be assessed as part of the construction phase assessment; and</li> <li>▪ the small scale and temporary nature of operational maintenance activities, as described in paragraphs 2.3.93 to 2.3.102 of the Scoping Report.</li> </ul> <p>The ES should confirm the amount of agricultural land to be permanently lost, including any lost as a result of any proposed maintenance easements. Reinstatement of land, and proposed soil management and handling measures, should be clearly described in the ES and secured through the dDCO.</p>
3.2.3	Table 7-2	Effects to soil resources during operation	<p>The Inspectorate agrees this matter can be scoped out on the basis that:</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<ul style="list-style-type: none"> <li>▪ temporary disturbance to soil leading to long-term change in soil function will be assessed as part of the construction phase assessment; and</li> <li>▪ the small scale and temporary nature of operational maintenance activities, as described in paragraphs 2.3.93 to 2.3.102 of the Scoping Report.</li> </ul> <p>Reinstatement of land following completion of construction and proposed soil management and handling measures including for any operational maintenance activities, should be clearly described in the ES and secured through the dDCO.</p>

ID	Ref	Description	Inspectorate's comments
3.2.4	Paragraphs 7.3.12 and 7.7.2 to 7.7.4	Agricultural land classification (ALC) surveys	<p>The Scoping Report states that detailed ALC surveys are proposed at the location of permanent works. It is stated that it might be appropriate to reduce the density of observations in the underground cable corridor. The Inspectorate advises that the survey effort should be sufficient to establish the baseline condition to enable a robust impact assessment. The ES should describe the final survey method and extent, with evidence of agreement (or otherwise) with relevant consultation bodies.</p> <p>The Inspectorate agrees that further ALC survey of land within the Henham Estate is not required on the basis that this location has already been subject to detailed survey.</p> <p>The results of the ALC survey work should be described in the ES, including supporting figures that show land within different ALC grades. It is noted that Figure 7-1 in the Scoping Report does not differentiate land in Grade 3a and 3b.</p>

ID	Ref	Description	Inspectorate's comments
3.2.5	N/A	Effects to agricultural productivity arising from soil heating due to operational cables	The Scoping Report does not refer to potential impacts from operation cables heating soil and affecting agricultural productivity. The Inspectorate considers that significant effects would be unlikely from this pathway but the ES should confirm what design measures are proposed for the electrical system to minimise heat loss.
3.2.6	N/A	Effects to Environmental Stewardship Agreement and Woodland Grant Schemes	The ES should identify the location of agri-environmental schemes within the study area and provide an assessment of likely significant effects on these receptors, where these could occur. Any mitigation required to avoid likely significant effects should be identified in the ES and demonstrably secured through the dDCO.

### 3.3 Onshore: ecology and biodiversity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8-8	Permanent or temporary loss of terrestrial, aquatic or intertidal habitats at Royal Society for the Protection of Birds (RSPB) sites during construction	<p>This matter is proposed to be scoped out on the basis that the Onshore Scoping Boundary would not overlap with any RSPB sites.</p> <p>The figures supporting the Scoping Report do not show the RSPB Reserves/ sites and thus their extent and proximity to the Proposed Development is not presented. They are however described in terms of distance to the Proposed Development at Table 8-5; the closest RSPB site is noted to be Minsmere at a distance of 25m.</p> <p>On the basis that habitat loss would not occur to RSPB sites and that potential likely significant effects to such sites including degradation of habitats due to changes in water quality and/ or quantity and disturbance of species, as applicable, are scoped in (as per Table 8-8), the Inspectorate agrees this matter can be scoped out of the impact assessment.</p>
3.3.2	Table 8-8	Permanent or temporary loss of terrestrial, aquatic or intertidal habitats at ancient woodland inventory (AWI) sites during construction	<p>This matter is proposed to be scoped out on the basis that trenchless techniques and/ or routing of cables (with associated construction corridors) would be used to avoid loss of ancient woodland.</p> <p>Paragraph 8.3.22 of the Scoping Report identifies that ancient woodland may be present within the Onshore Scoping Boundary beyond those identified on the AWI (Table 8-6). It is unclear if this matter to be scoped out includes all ancient woodland or only those listed on the AWI as per Table 8-6. The Inspectorate has commented on the assumption that it relates to all ancient woodland. The Applicant's attention is also directed to the comments of the Forestry Commission and Suffolk County Council (SCC) (Appendix 2 to this Opinion), which identify further potential ancient woodland not</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>included on the AWI, such as Theberton Wood, together with potential updates to the ancient woodland information held by the Suffolk Biodiversity Information Service.</p> <p>At this stage, and in the absence of information regarding the location of ancient woodland and certainty regarding routing and installation techniques, the Inspectorate cannot agree to scope out permanent or temporary loss of habitats at ancient woodland sites. The ES should include an assessment of this matter on ancient woodland sites, where likely significant effects could occur. The ES should clearly describe and adequately secure measures to avoid loss of ancient woodland such that likely significant effects would not occur.</p>
3.3.3	Table 8-8	Direct mortality of protected or notable species during operation	<p>This matter is proposed to be scoped out on the basis that any maintenance works would be focussed on infrastructure installed during construction and unlikely to require clearance of habitat likely to support protected or notable species. The Scoping Report notes that although vegetation management may be required in the form of cutting new hedgerows and trees, sensitive timing of such works would avoid damage or destruction of bird nests.</p> <p>The Inspectorate agrees that the maintenance activities are unlikely to lead to likely significant effects and can be scoped out on the above basis. The measures described to ensure avoidance of damage or destruction of bird nests must be adequately secured.</p>

ID	Ref	Description	Inspectorate's comments
3.3.4	Paragraphs 8.3.1 to 8.3.4	Baseline	The ES should clearly define and justify the study area, based on the Zone of Influence (ZoI) from the Proposed Development and the potential effect pathways. This should include the ZoI for designated sites, particularly the use of the 10km zone for European sites and

ID	Ref	Description	Inspectorate's comments
			5km for sites of special scientific interest (SSSI). The Applicant should consider the comments of NE in this regard (see Appendix 2 of this Opinion).
3.3.5	Paragraph 8.3.28	Hedgerows	<p>The Inspectorate notes reference to proposed hedgerow surveys at paragraphs 8.7.7 and 8.3.28, although limited detail on the likely extent and type of survey has been provided. The Scoping Report also states that <i>"Additional assessments to identify Important hedgerows will only be undertaken if permanent hedgerow loss cannot be avoided within the proposed Landfall Sites, proposed Converter Station or proposed Friston Substation."</i></p> <p>The Scoping Report does not expand on whether hedgerows along the cable corridor would also be permanently lost to the Proposed Development, although paragraph 13.8.4 of the Scoping Report refers to the assumption of no planting of hedgerows within 3m of the cable trench. Hedgerows are also not listed as features to be avoided through use of trenchless crossings at paragraph 8.5.3 of the Scoping Report.</p> <p>Sufficient baseline data should be collected to determine the likely significance of effects on hedgerow receptors, including those present along and affected by the cable route and within areas such as construction compounds, accesses, and haul routes. The ES should clearly state the value of hedgerows, the magnitude of impact, and significance of the effect. The ES should clearly describe and appropriately secure any mitigation measures relating to hedgerows, including eg replacement and restoration, as appropriate.</p>
3.3.6	Paragraphs 8.3.43, 8.3.62, and 8.3.93	Assessment of receptors between ES chapters – eg birds, otter and fish	The Inspectorate notes the intention to assess ornithological receptors in both onshore ecology and offshore ornithology ES chapters, and thus the potential for effects to be assessed on the same ornithological receptor but presented within the two different aspect chapters. The Scoping Report also proposes to consider the



ID	Ref	Description	Inspectorate's comments
			<p>combined offshore and onshore impacts in the Cumulative and Combined Effects ES Chapter. A similar approach is stated in respect of otters and fish receptors, with assessments in both onshore and offshore chapters and in ES Chapter 29.</p> <p>The ES should clearly identify likely significant effects to important ecological features, including ornithology receptors, and provide appropriate cross-reference to the findings of other relevant ES assessments to avoid duplication, whilst maintaining clarity of assessment.</p>
3.3.7	Paragraph 8.3.84	Great crested newts (GCN) and District Level Licensing (DLL)	<p>The Scoping Report describes the Applicant's intention to offset the effects of the Proposed Development on GCN by obtaining a licence through the NE DLL scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether the Proposed Development is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required.</p>
3.3.8	Paragraphs 8.3.88 to 8.3.93	Terrestrial invertebrates – baseline data	<p>The Applicant's attention is directed to the comments of Middleton cum Fordley Parish Council and Walberswick Parish Council (Appendix 2 to this Opinion), which identifies further areas of potential importance to invertebrates.</p>

ID	Ref	Description	Inspectorate's comments
3.3.9	n/a	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

### 3.4 Onshore: geology and contamination

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Paragraph 9.4.2 and Table 9-2	Damage or impairment of geodiversity sites during construction and operation	<p>The Scoping Report states that a significant effect is unlikely as there are no geodiversity sites within the scoping boundary.</p> <p>The Inspectorate notes that the Pakefield to East Bavents SSSI, designated for its geological interest, is located adjacent to the scoping boundary in the vicinity of the proposed Southwold landfall site and cable corridor. Paragraph 9.4.2 identifies potential impact pathways to the SSSI, including restricted access through footpath closures and changes in ground stability. In addition, it is considered that there could be coastal process impacts arising from the Proposed Development that could result in damage or impairment of the SSSI. The Inspectorate does not have sufficient justification on which to conclude, that significant effects are not likely and this matter should be scoped into the ES.</p> <p>Cross reference to the assessment of effects in the Marine Physical Processes ES Chapter can be used to avoid duplication of information.</p>
3.4.2	Table 9-2	Effects to human health from disturbance/ release of contamination during operation	<p>The Scoping Report states that ground investigation and assessment of known contamination sources should ensure that remediation is completed during the construction phase.</p> <p>The Inspectorate notes that effects on human health arising from disturbance/ release of contamination during construction would be assessed as part of the ES. The Inspectorate considers that further significant effects from the disturbance/ release of existing contamination during the operational phase are unlikely and agrees that this matter can be scoped out.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.3	Table 9-2	Effects to surface water and groundwater from accidental release of fuel or other chemicals	<p>The Scoping Report states that significant effects are not likely as storage of chemicals will be undertaken in accordance with best practice, eg bunded tanks.</p> <p>The Inspectorate agrees that, with the implementation of measures to limit any accidental release of pollution, any potential impacts are unlikely to result in significant effects and therefore further assessment is not required. The proposed best practice measures should be described in the ES and demonstrably secured in the dDCO.</p>
3.4.4	Table 9-2	Effects to groundwater from the creation of new contamination pathways along pipeline trenches during operation	<p>The Scoping Report states that significant effects are not likely as contamination would be identified and remediated during construction of open-cut trenches.</p> <p>The Inspectorate notes that effects arising from disturbance/ release of contamination during construction would be assessed as part of the ES. Please refer to the Inspectorate's comments at ID 3.4.10 of this Opinion regarding measures to remediate contamination. On that basis, the Inspectorate considers that further significant effects from the creation of new contamination pathways during the operational phase are unlikely and agrees that this matter can be scoped out.</p>
3.4.5	Table 9-2	Effects to the quality of deep groundwater aquifers from the creation of new contamination pathways along piled foundations during operation	<p>The Scoping Report states that significant effects are not likely as contamination at the surface would be identified and remediated during construction of the proposed Converter Station or other structures.</p> <p>The Inspectorate notes that effects arising from disturbance/ release of contamination during construction would be assessed as part of the ES. Please refer to the Inspectorate's comments at ID 3.4.10 of this Opinion regarding measures to remediate contamination. On that basis, the Inspectorate considers that further significant effects from</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
			the creation of new contamination pathways during the operational phase are unlikely and agrees that this matter can be scoped out.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.4.6	Paragraphs 9.3.1 to 9.3.5	Study area	<p>The Scoping Report describes the proposed study areas, comprising 250m and 500m buffers around the scoping boundary for geology and contamination and sensitive groundwater receptors respectively. It is stated that the proposed study areas are based on professional judgment, consistency with other major linear infrastructure schemes and published industry guidance, used to determine a ZoI.</p> <p>The final study area(s) should be based on an understanding of the likely contamination/ impact pathways that exist, informed by the baseline data collection. The ES should confirm the guidance that has been used to support identification of the ZoI.</p>
3.4.7	Paragraphs 9.5.4 to 9.5.5	Intrusive ground investigation	<p>The Scoping Report indicates that the assessment would primarily be based on desk-based sources, which would be validated using the results of intrusive ground investigation. It is stated that investigation is currently being designed for the proposed landfall and converter station sites, with a further phase planned for the underground cable corridor but that further detailed investigation would <i>"...be undertaken at later stages to inform detailed design."</i> No reference is made to the proposed Friston substation site, although paragraph 9.3.11 of the Scoping Report indicates that the use is currently and historically as farmland. Paragraph 9.5.5 suggests that investigation would not be undertaken on sites proposed for construction compounds until after grant of any DCO.</p> <p>The Applicant should seek to agree the approach to establishing baseline conditions with relevant consultation bodies, undertaking</p>

ID	Ref	Description	Inspectorate's comments
			intrusive ground investigation where it is deemed necessary to inform a robust assessment of likely significant effects and identification of mitigation required to address such effects in the ES. The scope, method and location of ground investigation should be clearly described in the ES.
3.4.8	Paragraph 9.6.2	Coastal stability and/ or erosion	<p>The Scoping Report states that this will not be assessed as part of the Geology and Contamination ES chapter but would be addressed in the Marine Physical Processes ES chapter and in a separate technical report on coastal stability.</p> <p>The Inspectorate advises that this matter should also form part of the geology assessment, noting that the proposed landfall sites are both in locations subject to coastal erosion. The Inspectorate's comments at ID 2.1.6 of this Opinion are also of relevance to this matter. Cross-reference can be made to the Marine Physical Processes ES chapter to avoid duplication.</p>
3.4.9	Table 9-2	Pollution of groundwater bodies because of uncontrolled release of contamination during construction and decommissioning	In addition to the receptors identified in Table 9-2, the Inspectorate advises that secondary aquifers should also be considered as a receptor in the assessment.
3.4.10	N/A	Creation of new contamination pathways to groundwater receptors during construction	The assessment of construction phase effects should include consideration of potential for existing contamination to be mobilised and released to new contamination pathways to groundwater receptors, including along pipeline trenches and piled foundations. Any measures required to remediate existing contamination and mitigate likely significant effects arising should be identified in the ES and demonstrably secured in the dDCO. In addition to the proposed Converter Station site, an assessment of other locations where piled foundations are proposed should be provided, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.4.11	N/A	Potential effects from UXO risk	The Scoping Report identifies areas of high UXO risk within the onshore scoping boundary but does not reference this as an impact pathway to be assessed in Table 9-2. Any likely significant effects to geology and contamination arising from the presence of UXO should be assessed and described in the ES.

### 3.5 Onshore: health and wellbeing

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 10-1	Disturbance or release of contamination in soil or groundwater to the residential population in the study area during construction	The Inspectorate notes that this matter is proposed to be scoped into the Geology and Contamination ES chapter for human health due to insufficient data being available to exclude likely significant effects at this stage. On that basis, the Inspectorate considers that sufficient justification has not been presented to scope this matter out and assessment should be provided where significant effects are likely to occur. However, the Inspectorate is content for the assessment to cross refer to information contained in the Geology and Contamination to avoid duplication of effort.
3.5.2	Table 10-1	Noise, air emissions and visual intrusion from maintenance activities to the residential population during operation	Based on the information presented in the Scoping Report about maintenance activities during operation (paragraphs 2.3.93 to 2.3.10), the Inspectorate considers that noise, air emissions and visual intrusion effects are unlikely result in significant effects on human health. The Inspectorate is content to scope this matter out.  The Scoping Report does not refer to effects on sensitive community receptors from these impact pathways, but noting the nature of the operational maintenance activities, the Inspectorate considers that it is unlikely that there would be significant effects these to receptors. The Inspectorate notes that visual effects to users of public rights of way (PRoW), open space and tourism facilities from the presence of the Proposed Development during operation is separately scoped into the Landscape and Visual Amenity ES Chapter.
3.5.3	Table 10-1	Traffic generated by maintenance activities to amenity and	The Scoping Report proposes to scope out an assessment of the onshore effects of traffic generated by maintenance activities for the operational stage, on the basis that the expected vehicle movements



<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
		community facilities during operation	associated with the Proposed Development would have a minimal impact on road transport.  Given the nature of the Proposed Development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.
3.5.4	Table 10-1	EMF generated by electrical equipment such as underground cables and sub-stations to the residential population during operation	The Inspectorate agrees this matter can be scoped out on the basis that the ES demonstrates the design is compliant with the International Commission on Non-Ionizing Radiation Protection guidance in ensuring that the threshold for impacts to humans is not met/ exceeded. Please note the Inspectorate's comments at ID 3.2.1 of this Opinion regarding submission of the onshore EMF assessment.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.5.5	Paragraph 10.3.3	Study area	The Scoping Report states that the principal study area for health and wellbeing assessment would be based on a 250m distance from the scoping boundary. It is stated that effects could arise at a greater distance than 250m from construction traffic, and that potential receptors in this case would be identified on a case-by case basis.  The assessment of effects arising from an increase in vehicle movements during construction should be undertaken for a study area that reflects the ARN, once established.
3.5.6	N/A	Effects to mental health arising from cumulation of projects	The Scoping Report provides a baseline description for mental health matters in Suffolk, including reference to survey data collected by Suffolk Minds and the Suffolk Joint Strategic Needs Assessment. However, it is unclear whether this matter is proposed to be considered in the assessment. The Inspectorate also notes that comments from several consultation bodies (Appendix 2 of this

ID	Ref	Description	Inspectorate's comments
			Opinion) regarding cumulative effects of multiple NSIPs being located in Suffolk on the mental health and wellbeing of local residents. The Inspectorate advises that effects on mental health arising from the cumulation of major projects in the study area should be assessed and reported in the ES where significant effects are likely.

### 3.6 Onshore: historic environment

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.6.2	Paragraph 11.3.2	Study area	The ES should clearly define and justify the study area for designated and non-designated heritage assets, with reference to the potential ZoI for the Proposed Development. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies, eg Historic England and the host local authorities.
3.6.3	Section 11.3	Interrelationship with geological baseline	The Applicant's attention is drawn to the comments of Historic England (Appendix 2 of this Opinion) regarding the Pakefield-Easton Barents SSSI and locations with archaeological potential identified in Chapter 9 Geology and Contamination of the Scoping Report. These include peat alluvial deposits, Dunwich River and the proposed Southwold landfall site. The baseline description in the ES should include these matters, which could be by cross-reference to the Geology and Contamination ES Chapter to avoid duplication. The assessment of effects should include consideration of these matters where significant effects are likely to occur.
3.6.4	Paragraph 11.7.10	Archaeological surveys	The Applicant should ensure that the baseline information used to inform the assessment is robust and allows for suitable identification of assets likely to be impacted by the Proposed Development. Effort should be made to agree the need for, and scope/ location of,

ID	Ref	Description	Inspectorate's comments
			intrusive investigations (paragraph 11.7.10 of the Scoping Report indicates that geophysical or trial trenching may be carried out) with relevant consultation bodies, including Historic England and the host local authorities. Consideration should be given to the use of boreholes and deposit modelling where more deeply buried remains are expected. Where necessary, intrusive investigations should be completed prior to submission of the DCO application and reported in the ES. The Applicant should note the comments of Historic England and SCC (Appendix 2 of this Opinion) in this regard.
3.6.5	Table 11-7	Significance of effects terminology	The descriptors listed in Table 11-7 are proposed to be used where there is more than one possible effect significance outcome using the descriptors in Table 5-3. The ES should clearly explain how professional judgment has been used to determine the final effect significance when using descriptors in Table 11-7, including how asset value and magnitude of change have been assigned.
3.6.6	N/A	Effects of changes to drainage on designated and non-designated heritage assets	The onshore elements of the Proposed Development have potential to alter the pattern of drainage within and adjacent to the boundary of works. Impacts on heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where significant effects are likely to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to the Hydrology, Hydrogeology and Drainage ES Chapter should be included.
3.6.7	N/A	Zone of Theoretical Visibility (ZTV)	The ZTV developed for the assessment of landscape and visual effects should be used to confirm the heritage assets that may experience visual impacts from the Proposed Development. The assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the Proposed Development. Effort should be made to agree appropriate viewpoint

ID	Ref	Description	Inspectorate's comments
			locations and such visualisations with relevant consultation bodies, including Historic England and host local authorities. Cross reference can be made to the Landscape and Visual Impact ES Chapter to avoid duplication.
3.6.8	Figure 11-1	Southwold and Walberswick Conservation Areas	The Applicant's attention is drawn to the comments of Historic England (Appendix 2 of this Opinion), noting that the Southwold and Walberswick Conservation Area boundaries changed in January 2024. This should be reflected in the ES figures and assessment.

### 3.7 Onshore: hydrology, hydrogeology and drainage

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 12-7	Impacts on the listed main rivers at the proposed Friston substation, underground HVAC cable corridor and converter station sites during construction	<p>The Scoping Report states that there are no receptors within the study area for these components that would be susceptible to impact. Paragraph 12.3.16 of the Scoping Report states that the closest water body catchment to the substation site is 400m from the Proposed Development. Paragraph 12.3.28 states that the converter station site is entirely within the Fromus river water body catchment. Paragraph 12.3.22 states that there is no main river between the substation and converter station sites but that the HVAC cable corridor is likely to cross a tributary of the River Fromus. Minor surface water features could be present in each location, but it is unclear whether these could be hydrologically linked to main rivers. It is understood that the HVAC cable corridor crosses through areas of Flood Zones 2 and 3.</p> <p>The Inspectorate does not consider that sufficient justification to demonstrate an absence of impact pathways has been presented for these matters to be scoped out. They should be scoped into the assessment or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>
3.7.2	Table 12-7	Impacts on larger ordinary watercourses at the proposed Friston substation and converter station sites during construction	<p>The Inspectorate's comments at ID 3.7.1 apply equally to this matter. This matter should be scoped into the assessment or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.3	Table 12-7	Impacts on minor watercourses and land drainage during construction	<p>The Scoping Report proposes to scope out an assessment of impacts on minor ordinary watercourses and land drainage during construction of the Proposed Development on the basis that control measures will be implemented to manage direct and indirect impacts and prevent significant effects.</p> <p>In the absence of detail about the proposed mitigation and noting the comments of the Environment Agency (EA) (Appendix 2 of this Opinion) that minor watercourses could be more sensitive to pollution, the Inspectorate does not have sufficient justification to agree to scope out this matter from assessment. The ES should provide an assessment of the likely significant effects on minor watercourses and land drainage during construction of the Proposed Development or demonstrate the absence of likely significant effects, with evidence of agreement with relevant consultation bodies.</p>
3.7.4	Table 12-7	Impact of changes to surface water flows and flood risk of main rivers and larger ordinary watercourses during operation	<p>The Scoping Report proposes to scope out this matter on the basis that land within the cable corridor will be reinstated following completion of construction works, that there will be no permanent physical disturbance of water features and implementation of an appropriate sustainable urban drainage system (SuDS).</p> <p>In the absence of detail about the proposed reinstatement and mitigation and noting the comments of the EA (Appendix 2 of this Opinion), the Inspectorate is not able to agree to scope out this matter from assessment at this stage. The ES should provide an assessment or demonstrate the absence of likely significant effects, with evidence of agreement with relevant consultation bodies.</p>
3.7.5	Table 12-7	Impact of the release of pollutants to surface water on main rivers	<p>The Scoping Report provides limited justification for why this matter should be scoped out beyond stating that the maintenance activities would be as described for construction but on a more localised scale</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and larger ordinary watercourses during operation	<p>and that SuDS would be implemented. Noting that construction phase effects for this matter are scoped in, the Inspectorate does not have sufficient justification to agree this matter can be scoped out of the assessment at this stage. This matter should be scoped into the assessment or ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p> <p>The ES should provide details of any controls that are proposed to limit the potential release of pollutants to surface water during operation of the Proposed Development, for example in an environmental management plan. Any measures should be demonstrably secured in the dDCO.</p>
3.7.6	Table 12-7	<p>Impact of changes to groundwater flows and flood risk during operation on:</p> <ul style="list-style-type: none"> <li>• superficial deposits;</li> <li>• Crag Group bedrock (principal aquifer);</li> <li>• source protection zones (SPZ) 1 to 3; and</li> <li>• groundwater dependent terrestrial ecosystems.</li> </ul>	<p>The Scoping Report proposes to scope out this matter on the basis that the potential for impacts to groundwater flow paths (and related flood risk) from permanent below ground structures (such as piles and retaining walls) is proposed to be assessed for construction impacts and no further impacts are anticipated during operation.</p> <p>The Inspectorate agrees that this matter can be scoped out provided that the construction phase assessment considers the permanent changes introduced by the Proposed Development and that any mitigation required to avoid likely significant effects is described in the ES and demonstrably secured in the dDCO.</p>
3.7.7	Table 12-7	<p>Impact of the release of pollutants to groundwater during operation on:</p> <ul style="list-style-type: none"> <li>• superficial deposits;</li> </ul>	<p>The Scoping Report states that "<i>maintenance activities are considered to be as described for construction, albeit on a more localised scale</i>". However, impacts from release of pollutants to groundwater during construction have been scoped into the ES and the extent of potential pollution to groundwater during operation is unclear. The</p>



ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> <li>• Crag Group bedrock (principal aquifer);</li> <li>• SPZ 1 to 3; and</li> <li>• groundwater dependent terrestrial ecosystems.</li> </ul>	<p>Inspectorate does not have sufficient justification to scope this matter out at this stage. An assessment should be provided, or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p> <p>The ES should provide details of any controls that are proposed to limit the potential release of pollutants to groundwater during operation of the Proposed Development, for example in an environmental management plan. Any measures should be demonstrably secured in the dDCO.</p>
3.7.8	Table 12-7	<p>Impact of changes to surface water or groundwater flows and flood risk during operation on:</p> <ul style="list-style-type: none"> <li>• licensed and private abstractions (surface water and groundwater);</li> <li>• consented discharges (to surface water or land); and</li> <li>• groundwater-surface water interactions (eg springs/ sinks).</li> </ul>	<p>The Applicant proposes to scope out this matter on the basis that the potential for impacts to surface water and groundwater flow paths (and related flood risk) is proposed to be assessed for construction impacts and no further impacts are anticipated during operation.</p> <p>The Inspectorate agrees that this matter can be scoped out provided that the construction phase assessment considers the permanent changes introduced by the Proposed Development and that any mitigation required to avoid likely significant effects is described in the ES and demonstrably secured in the dDCO.</p>
3.7.9	Table 12-7	<p>Impact of the release of pollutants to surface water or groundwater during operation on:</p> <ul style="list-style-type: none"> <li>• licensed and private abstractions (surface water and groundwater);</li> </ul>	<p>The Scoping Report states that "<i>maintenance activities are considered to be as described for construction, albeit on a more localised scale</i>". However, impacts from the release of pollutants to surface water or groundwater during construction have been scoped into the ES and the extent of potential pollution to these receptors during operation is unclear. The Inspectorate does not have sufficient justification to agree to scope these matters out at this stage. An assessment should be provided, or the ES should otherwise explain, with evidence of</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
		<ul style="list-style-type: none"> <li>consented discharges (to surface water or land); and</li> <li>groundwater-surface water interactions (eg springs/ sinks).</li> </ul>	<p>agreement from relevant consultation bodies, why significant effects are not likely to occur.</p> <p>The ES should provide details of any controls that are proposed to limit the potential release of pollutants to surface and/ or groundwater during operation of the Proposed Development, for example in an environmental management plan. Any measures should be demonstrably secured in the dDCO.</p>
3.7.10	Table 12-7	Flood risk to proposed onshore elements from floodplains and from the onshore elements to sensitive receptors and critical infrastructure during operation	<p>The Scoping Report seeks to scope these matters out based on them being assessed during the construction phase. However, it is also stated that there is potential for permanent infrastructure to be located within fluvial and/ or pluvial flood zones.</p> <p>The Inspectorate does not have sufficient justification to agree to scope these matters out of the assessment. The ES should provide an assessment of the flood risk for these matters, which should also consider changes to the future baseline arising from climate change.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.7.11	Paragraphs 12.3.1 to 12.3.5	Study area	<p>The Scoping Report states that a 500m buffer has been applied to identify key surface water and groundwater features that may be affected by the Proposed Development. However, the final study area will be reviewed following refinement of the Proposed Development's order limits.</p> <p>The ES should clearly define and justify the final extent of the study area with reference to the potential ZoI taking into account any receptors where there is potential for hydraulic connectivity with the proposed site. Any use of professional judgement should be fully</p>

ID	Ref	Description	Inspectorate's comments
			justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies.
3.7.12	Section 12.4	Potential impacts on flood defences and tidal flood risk	The ES should identify the location and condition of any main river and coastal flood defences within the study area. This information should be used to inform an assessment of potential flood risk impact from damage to these defences as well as the depth of cable crossing required beneath the main river and defence assets.
3.7.13	Paragraph 12.4.2	Potential impacts to drainage and utilities infrastructure during construction	The ES should identify any drainage and utilities' infrastructure that may be present within the study area and provide an assessment of the potential impacts from damage to this infrastructure, where significant effects are likely to occur.
3.7.14	Paragraph 12.4.2	Potential impacts from welfare facilities' sewage during construction	The ES should describe how sewage from construction welfare facilities would be discharged/ managed and provide an assessment of the potential impacts to water resources, where significant effects are likely to occur.
3.7.15	Tables 12-8 and 12-9	Receptor sensitivity and magnitude of impact	The Applicant's attention is drawn to the EA's comments (Appendix 2 of this Scoping Opinion) regarding how assessment criteria have been defined. The ES should present a clear justification for the criterion applied and effort should be made to agree the approach with relevant consultation bodies.
3.7.16	Appendix 12-A	Flood Zone 3	Where relevant, the ES and FRA should differentiate between Flood Zones 3a and 3b in order to determine which parts of the site are located in areas considered as 'high probability of flooding' and 'functional floodplain'. The ES should include a figure to illustrate the extent of Flood Zones 3a and 3b.
3.7.17	N/A	Surface water receptors	The Scoping Report indicates that minor surface water features such as ponds, ditches and drainage may be present within the proposed

ID	Ref	Description	Inspectorate's comments
			onshore scoping boundary area. The Applicant should ensure that all surface water features within the study area that have the potential to be significantly affected by the Proposed Development have been identified and assessed in the ES.
3.7.18	N/A	Watercourse crossings	The ES should consider the potential of proposed watercourse crossings to impact the ecological status of watercourses under the Water Framework Directive (WFD) and the results of the WFD Assessment should be reported in the ES and/ or associated Technical Appendix.
3.7.19	N/A	Water sampling	The Scoping Report does not refer to water sampling or analysis of existing surface water or groundwater receptors within the study area that would be undertaken to inform the assessment of effects from contaminated runoff. The Inspectorate advises that effort should be made to seek to agree the requirement and scope of water sampling and analysis with relevant consultation bodies, including the EA.
3.7.20	N/A	Private water supplies	The ES should identify the location of private water supplies within the study area. This information should be used to inform the assessment of construction phase effects and identification of mitigation required to address any likely significant effects.
3.7.21	N/A	Existing flood modelling data	The Applicant's attention is directed to the comments of the EA (Appendix 2 to this Opinion) with regards to additional sources of flood modelling data.

### 3.8 Onshore: landscape and visual

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paragraph 13.6.3	Seascape character during construction	<p>The Scoping Report states that the ES will assess potential visual impacts to coastal receptors from offshore construction activities. However, an assessment of the potential impacts of the Proposed Development on seascape character is proposed to be scoped out based on the construction activity being viewed in the context of large ships.</p> <p>The Inspectorate notes that section 13 of the Scoping Report does not present a description of baseline seascape character so it is unclear what the receiving environment is and whether there could be impact pathways to significant effects. The Inspectorate does not deem that the Scoping Report has provided sufficient justification to scope this matter out and the ES should provide an assessment, including consideration of the presence and movements of construction vessels, where significant effects are likely to occur. The ES should describe the seascape character, including any relevant designations.</p>

ID	Ref	Description	Inspectorate's comments
3.8.2	Paragraph 13.3.3	Study area	<p>The Scoping Report states that a 3km study area would be used for the assessment. Paragraph 13.3.3 states that landscape and visual effects beyond this distance are not likely to be significant based on the characteristics of the receiving landscape, including landform, buildings and vegetation. The final study area would be reviewed following refinement of the Proposed Development's order limits.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The ES should justify the study area used based on the worst-case scenario(s). In determining the final study area, the Applicant should consider the results of the proposed ZTVs and make effort to agree it with relevant consultation bodies.</p>
3.8.3	Paragraph 13.7.37	Representative viewpoints	<p>Effort should be made to agree the number and location of viewpoints with relevant consultation bodies, including the host local authorities. The ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided.</p> <p>The ES should include a plan to illustrate the location of viewpoints in relation to the Proposed Development. Consideration should be given to the production of night-time visualisations to support the assessment of effects from lighting requirements.</p>
3.8.4	Paragraph 13.7.38	Assessment scenarios	<p>The Scoping Report states that photomontages will be prepared for selected viewpoints at year 1 operation (winter) and year 15 operation (summer). The Applicant should provide photomontages during winter as well as in summer for the current baseline and future year scenarios to allow an assessment of the maximum visibility scenario and illustrate the seasonal variation in screening provided by vegetation planting in line with the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Assessment, 3rd Edition, 2013).</p>
3.8.5	N/A	Offshore visual impacts	<p>The Inspectorate considers that the ES should provide an assessment of the potential impacts of construction activities, including the presence and movements of associated vessels, on offshore visual receptors, such as recreational vessels, where significant effects are likely to occur. Consideration should also be given to the potential cumulative visual effects of offshore construction activities on</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
			receptors. Cross references to the Shipping and Navigation ES Chapter should be included.

### 3.9 Onshore: noise and vibration

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 14-2	Noise and vibration effects from underground cables during operation, including maintenance	<p>The Scoping Report states that significant effects are unlikely as the equipment is unlikely to give rise to vibration levels that would cause annoyance or disturbance. No justification is presented for noise.</p> <p>Based on the nature of the infrastructure, which would be buried, together with the small scale and temporary nature of operational maintenance activities described in paragraphs 2.3.93 to 2.3.102 of the Scoping Report, the Inspectorate agrees that operation of the underground cables is unlikely to generate noise and/ or vibration on a scale that would result in significant effects and this matter can be scoped out of the assessment.</p>
3.9.2	Table 14-2	Traffic noise and vibration effects during operation	<p>The Scoping Report states that operational traffic movements are likely to be infrequent and unlikely to result in significant effects.</p> <p>On the basis that there will be minimal levels of additional road traffic during operation as described at paragraphs 2.3.93 to 2.3.97 of the Scoping Report, the Inspectorate agrees that there are unlikely to be significant effects arising in relation to noise and vibration and this matter can be scoped out of the ES. The ES should define the anticipated number of operational road vehicle movements.</p>
3.9.3	Table 14-2	Vibration effects from the proposed Converter Station and Friston substation during operation	<p>Limited justification is presented for the proposed scoping out of this matter in the Scoping Report.</p> <p>The Inspectorate does not agree to scope this matter out given the uncertainties regarding the chosen location of the converter station and the proximity to sensitive receptors. The Scoping Report provides limited information regarding anticipated operational vibration levels.</p>



<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
			The ES should provide an assessment of operational vibration or information demonstrating the absence of likely significant effects, with evidence of any agreement with relevant consultation bodies.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.9.4	Paragraph 14.3.1	Study areas	<p>The Scoping Report states that the operational phase study area will be defined when the locations of operational noise and vibration sources are known. The ES should describe the basis on which the final study area is selected, including reference to relevant industry guidance and agreement with relevant consultation bodies.</p> <p>The ES should include figures to illustrate the final study area(s) adopted for noise and vibration impacts, including construction traffic noise, and the receptors within the defined study area.</p>
3.9.5	Paragraphs 14.5.3 to 14.5.4	Mitigation	The Scoping Report refers to noise mitigation measures which include screening and enclosures. The ES should address the potential for mitigation for an aspect giving rise to significant effects for another aspects, such as noise bunds resulting in a landscape and visual effect.
3.9.6	Paragraphs 14.3.13 and 14.7.27 to 14.7.28	Determining significance of effect	The Scoping Report describes that there is a Noise Important Area (NIA) at Blythburgh. The ES should explain what receptor sensitivity is assigned to receptors within the NIA to determine effect significance.

### 3.10 Onshore: traffic and transport

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Paragraph 2.3.76, 2.3.77 and Table 15.2	Increased congestion and journey time on road users due to road closures/ diversions for abnormal load access during construction	<p>The Scoping Report proposes to scope this matter out on the basis that abnormal loads would be planned for off peak times when the road network is less busy, avoiding significant effects on road users. Paragraph 2.3.76 references an assessment that will be undertaken to identify which roads are suitable for access by Abnormal Indivisible Loads (AILs).</p> <p>The potential routing for AILs, number of AIL movements and location of any closures/ diversions for AIL access is not yet defined. As such there is insufficient justification available to scope this matter out of the ES. The ES should include an assessment of this matter where there is potential for likely significant effects to occur. Effort should be made to agree the scope of the assessment with relevant consultation bodies, including the highways authority. The assessment should consider potential for any closures/ diversions to result in interactions with other aspects such as noise and air quality.</p>
3.10.2	Paragraph 15.5.3 and Table 15.2	Impacts on railway users from the closure of the railway line to enable construction of the cable corridor during construction	<p>The Scoping Report proposes to scope this matter out on the basis that trenchless methods would be employed when installing cables to avoid any potential impacts on the railway.</p> <p>In the absence of the location and number of required crossings and the feasibility of the preferred trenchless crossing method and noting the potential requirement of vehicle crossing points for maintenance trips, the Inspectorate is not in a position to agree to scope this matter out of assessment at this stage. The ES should include an assessment or demonstrate the absence of likely significant effects, with evidence of agreement with the relevant consultation bodies.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.3	Paragraph 15.4.3 and Table 15.2	Impact of increased traffic volumes and congestion on road users, public transport users (bus) and pedestrians and cyclists during operation	<p>The Scoping Report seeks to scope out these matters on the basis that the number of operation and maintenance trips would be low and significant effects on driver delay, public transport delay pedestrian delay, highway safety and traffic severance are not considered likely.</p> <p>The Inspectorate considers that increased traffic volumes associated with operational staff, as described in paragraphs 2.3.93 to 2.3.97 of the Scoping Report, are unlikely to result in significant effects. These matters can be scoped out of the assessment.</p> <p>However, the Inspectorate advises that consideration should be given to the potential for operational maintenance requirements associated with the Proposed Development to result in additional HGV and/ or AIL movements, that could necessitate traffic diversions and/ or road closures and delay to road users. This should be considered in the context of potential cumulation of diversion and closure with other proposed major projects in the Friston area. If significant effects are likely, these should be described in the ES together with any proposed mitigation.</p>
3.10.4	Table 15.2	Impact of vehicle crossing points on railway users during operation	<p>The Scoping Report proposes to scope this matter out on the basis that the number of vehicle maintenance trips crossing the railway (if required) would be low and no significant effects on rail passenger delay are expected as a result. The railway within the study area is part of a branch line that does not currently admit passengers.</p> <p>On that basis, the Inspectorate agrees to scope this matter out from assessment. The ES should confirm the location and number of any railway crossings, and the predicted number of vehicle crossings.</p>

ID	Ref	Description	Inspectorate's comments
3.10.5	Paragraph 15.3.2 and 15.3.4	Study area	The Inspectorate notes that the study area for assessment of transport impacts has not been defined in detail yet and will be reviewed and further refined for the ES assessment to reflect selected options. The baseline data gathering and assessments within the ES should be based on a study area which captures the full extent of effects on both the strategic and local road networks. Effort should be made to agree the study area with the relevant consultation bodies.
3.10.6	Paragraph 2.3.76	Transport modes	No reference has been made to potential to use alternative modes of transport to road, eg rail and boat. The Applicant should consider whether alternative transport modes could represent an environmentally better outcome than road transport. Where use of alternative transport modes is proposed, the ES should include information about the expected split of transport modes and the frequency, location and type of movements associated with each mode. The worst-case scenario for traffic and transport impacts should be established in the ES and the assessment of significant effects should be undertaken on that basis.
3.10.7	Paragraph 15.4.2 and Table 15.2	Temporary diversions of traffic during construction	The locations of any proposed diversions or temporary road closures should be illustrated on suitable figures in the ES. The ES should consider potential interactions between aspect assessments (for example traffic and transport, noise, dust, recreation and visual impact) arising from diversions.
3.10.8	N/A	Baseline description	The Applicant's attention is drawn to comments from SCC (Appendix 2 of this Opinion), which include detail about matters that should be reflected in the baseline description presented in the ES.

### 3.11 Onshore: socio-economics, recreation and tourism

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 16-8	Residential property direct impacts during construction	The Scoping Report states that the Proposed Development has been designed to avoid residential properties. The Inspectorate agrees that as no direct impact is required to residential properties during construction, significant effects are not likely to occur, and this matter can be scoped out of the assessment. However, the ES should confirm that there is no change in these assumptions based on the final design that would result in direct impacts.
3.11.2	Table 16-8	Residential property indirect impacts during construction	The Scoping Report states that indirect effects to residential property will be managed through the CTMP and CEMP and that access to properties would be maintained at all times to reduce the potential for significant effects. The Inspectorate notes that construction effects on human receptors, including noise and dust to residential receptors within the relevant study area, are proposed to be scoped into the ES. The Inspectorate agrees that indirect impacts to residential property do not need to be separately assessed and this matter can be scoped out of the ES.
3.11.3	Table 16-8	Tourist accommodation during construction	The Scoping Report states that most workers are anticipated to be sourced locally, however an estimation of workforce numbers is not provided. The Inspectorate is therefore unable to make a judgement on whether this likely number of workers is feasible to be sourced locally; this matter should be scoped into the assessment.  The Applicant's attention is drawn to the comments of SCC (Appendix 2 of this Opinion) regarding identification of a workforce profile; the

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
			ES should describe the workforce profile that has been assumed in the assessment.
3.11.4	Table 16-8	Residential property direct and indirect impacts, community amenity, business direct and indirect impacts, community facilities and open space direct and indirect impacts, PRow including promoted recreational routes, visitor attractions, tourism sector including tourism destinations, development land during operation	<p>The Scoping Report proposes to scope these matters out for the operational phase of the Proposed Development as no direct or indirect significant effects are expected during operation due to the limited nature of maintenance activities required. In the case of PRow, operational effects would be separately assessed as part of the Traffic and Transport ES Chapter. In the case of impacts to development land, it is stated that permanent effects would be assessed as part of the construction phase assessment.</p> <p>On that basis, the Inspectorate agrees that significant effects from the remaining matters are not likely, and they can be scoped out of the assessment.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.11.5	Paragraph 16.3.3	Study area	<p>The Scoping Report states that a 500m buffer has been informed by published industry guidance and professional judgement. The ES should confirm which guidance has been referred to, and why it is appropriate as basis for defining the study area. Effort should be made to agree the final study area(s) with relevant consultation bodies, including the host local authorities. The ES should report the level of agreement or otherwise.</p> <p>The Applicant's attention is drawn to the comments of ES (Appendix 2 of this Opinion) regarding Saxmundham and Southwold town centres. The study area should be extended to include these locations where there is potential for likely significant effects to local businesses.</p>

ID	Ref	Description	Inspectorate's comments
3.11.6	Paragraph 16.3.23	Recreational routes	<p>The Scoping Report refers to promoted recreational routes within the study area that form part of the baseline. The Inspectorate's advises that cross-reference should be made to baseline information in the Landscape and Visual Impact and Traffic and Transport ES Chapters to ensure that all routes have been captured. For example, it is noted that users of the King Charles III England Coast Path National Trail may be affected. The Applicant's attention is drawn to the comments of SCC (Appendix 2 of this Opinion), which provide further information about recreational routes.</p>

### 3.12 Onshore: material assets and waste

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 17-9	<p>Effects arising during operation from:</p> <ul style="list-style-type: none"> <li>▪ extraction of raw materials and production of construction materials; and</li> <li>▪ production, movement, transport, processing, use and disposal of waste.</li> </ul>	<p>The Scoping Report states that materials resource use and waste generation is expected to be minimal and that effects would be mitigated through implementation of standard procedures.</p> <p>The Inspectorate agrees that an assessment of these matters can be scoped out of the ES. The ES should however include a description of any proposed standard materials use and/ or waste management procedures and confirm how these would be secured as part of the dDCO. The ES must contain an estimate of types and quantities of materials to be used and/ or waste arising from operation, including for any comprehensive repair or refurbishment.</p>
3.12.2	Table 17-9	Effects arising from constraint of existing or future use and extraction of materials during operation	<p>The Scoping Report does not present a justification for scoping this matter out (it refers only to material resource use being minimal). However, noting that this matter would be considered for the construction phase, the Inspectorate is content that it can be scoped out of the assessment for operation providing that the construction phase assessment includes consideration of any permanent sterilisation of natural resource including minerals and peat.</p>

ID	Ref	Description	Inspectorate's comments
3.12.3	Paragraph 17.5.4	Control measures	<p>The Scoping Report describes a series of potential control measures that could be implemented to mitigate adverse effects. It is stated in some instances that measures would be set out within a CEMP or MMP; however, in other instances it is unclear how the measures would be secured. The ES should make clear how any measures</p>



ID	Ref	Description	Inspectorate's comments
			relied upon to avoid, reduce or minimise significant adverse effects are to be delivered/ secured through the dDCO.
3.124	Table 17-9	Effects to existing or future use and extraction of materials	Paragraph 17.4.4 of the Scoping Report states that the Proposed Development has potential constrain use and/ or extraction of resources including peat but this resource is not referred to in Table 17-9. The ES should describe any likely significant effects arising from constraint of peat resource during construction.
3.125	Paragraph 17.7.3	Natural resources	For the avoidance of doubt, the Inspectorate advises that the expected type and quantity of natural resource(s) required to construct and operate the Proposed Development should be described in the ES, even if it is determined that further assessment is not required. This should include consideration of water resource requirements.

### 3.13 Offshore: marine physical environment

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paragraph 18.5.3 and Table 18-4	Changes to coastal morphology during construction	<p>The Scoping Report states that disturbance would be minimised by the use of trenchless techniques and that a separate technical report will be prepared to consider potential impacts of erosion and beach draw down on coastal morphology at the proposed landfall sites, which will inform the position and design of infrastructure at this location. The Scoping Report acknowledges that a temporary coffer dam or temporary deposits may be required, which could disturb or disrupt existing sediment transport pathways along the coast. However, it considers impacts associated with this to be low due to the existing man-made coastal defence structure in the area.</p> <p>The Inspectorate considers that sufficient justification has not been provided to exclude the possibility of likely significant effects at this stage given that the likely route and construction methodology (including potential use of a coffer dam and deposits arising) has not been determined. It is also unclear whether any cable crossings and/ or cable protection and/ or ancillary construction infrastructure would be required in shallow nearshore areas, which could affect waves and currents and thus changes to coastal morphology. This matter should be scoped into the assessment and informed by the separate technical report.</p> <p>Consideration should be given to implications from coastal change on the selected landfall location and construction method.</p>
3.13.2	Table 18-4	Changes to tides, waves and sediment regime from temporary seabed disturbance as a result of	The Scoping Report states that change to seabed morphology from temporary habitat loss/ seabed disturbance is scoped into the assessment but this specific impact pathway is proposed to be scoped

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		seabed preparation activities that could alter water depths	<p>out as local or regional scale changes are not expected due to changes to water depths being small relative to the overall water depth, highly localised and short-lived.</p> <p>The Inspectorate agrees that this matter can be scoped out of further assessment based on the information presented, noting that impacts arising from the presence of the cable would be assessed elsewhere.</p>
3.13.3	Table 18-4	Changes to water quality and seabed substrates from temporary increase in suspended sediments and deposition during construction and operation (excluding pre-sweeping)	<p>The Scoping Report seeks to scope this matter out for activities including seabed preparation (other than pre-sweeping), cable burial, repair and removal based on the spatial extent of sediment plume being localised and natural conditions being likely to return within a single tidal cycle (or a maximum of 4 to 5 days if very fine chalk particles are present). Reference is made to modelling completed on other cable projects including Gridlink and Viking Link to support this position. Information about sediment quality is presented at paragraphs 18.3.40 to 18.3.42 of the Scoping Report, which describes that contaminant concentrations in the study area (based on grab sampling from nearby proposed offshore wind farms) are generally below Centre for Environment, Fisheries and Aquaculture Science (CEFAS) Action Level 1. Three samples were above Level 1 but below Level 2.</p> <p>The Inspectorate notes that site survey work has not yet been undertaken so the potential for contaminants/ nutrients to be present is not fully understood. Whilst data and modelling from other projects has been referenced, the Inspectorate does not consider that there is sufficient justification that this would be applicable to the Proposed Development. The Scoping Report does not detail the likely methodology to be applied to the assessment. In addition, the seabed preparation activities are not yet clearly defined, and it is not clear what activities might be required for maintenance during operation.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate does not agree that this matter can be scoped out at this stage. The ES should include information on sediment quality and include an assessment of likely significant effects to water quality through suspension of contaminated sediments, including nutrients/chemicals, where these could occur. Any assessment should be informed by robust baseline information, including survey data, and sediment modelling (noting that paragraph 21.7.13 of the Scoping Report states such modelling would also be used to inform the assessment of effects to offshore ornithology).</p>
3.13.4	Table 18-4	Transboundary effects from the impact pathway described at ID 3.13.2	<p>The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.2 of this Opinion.</p>
3.13.5	Table 18-4	Changes to sediment quality and water quality from release of drilling fluids during construction and operation	<p>The Scoping Report proposes to scope this matter out on the basis that drilling fluids are a combination of water and chemicals ranked by CEFAS as posing little or no risk (PLONOR) to the environment. It is stated that monitoring measures would be in place to stop drilling in the event of breakout or continue with approval from authorities.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the monitoring, and any subsequent mitigation measures required to avoid a likely significant effect are fully described in the ES. It should explain how delivery is assured with reference to relevant documents.</p>
3.13.6	Table 18-4	Changes to sediment quality and water quality from accidental spills during construction and operation	<p>Paragraph 18.5.4 of the Scoping Report states that control measures will include production of an emergency spill response plan and marine pollution contingency plan (MPCP) as part of a CoCP, together with vessel compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78. Table 18-4 states</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>that it is a legal requirement that all vessels have a Shipboard oil pollution emergency plan (SOPEP).</p> <p>Based on the information provided on the proposed control measures, the Inspectorate agrees that significant effects from accidental release of pollution during construction and operation are unlikely and this matter can be scoped out of the assessment.</p> <p>The ES should identify and ensure that mitigation for all potential pollution incidents is accounted for in the MPCP, an outline or draft of which should be submitted with the DCO application. The ES should explain where appropriate management and control measures to reduce/ avoid potential pollution events are secured through the dDCO or other legal mechanism.</p>
3.13.7	Table 18-4	Changes to sediment quality from temperature increase during operation	<p>The Scoping Report seeks to scope this matter out on the basis that temperature changes would be localised around the cable and undetectable against natural temperature fluctuations. Reference is made to calculations for Viking Link, which demonstrate that heating more than 2°C at 20cm sediment depth would only occur if cables were buried to less than 0.75m.</p> <p>In the absence of the CBRA and information to demonstrate that cable burial depths of more than 0.75m can be achieved, the Inspectorate does not have sufficient justification to exclude the possibility of likely significant effects. This matter should be scoped into the assessment or the ES should demonstrate, with evidence of agreement from relevant consultation bodies, an absence of likely significant effects.</p>

ID	Ref	Description	Inspectorate's comments
3.13.8	Paragraphs 18.3.3 to 18.3.4	Study area	The proposed study area is based on the offshore scoping boundary with a 15km buffer, which it is stated reflects local tidal excursion distances. It is proposed to keep the ZoI under review as the project is refined and preferred landfall and cable corridor are selected. The ES should clearly define the study area, based on the ZoI, together with a robust justification for its final extent.
3.13.9	Paragraph 18.3.20	Baseline – sediment transportation	The Applicant's attention is directed to the comments of the EA (Appendix 2 of this Opinion) in respect of shoreline sediment transportation, which identifies areas of variance compared to that stated in the Scoping Report. The Applicant should seek to agree the baseline data in respect to sediment transportation with relevant consultation bodies, where possible.
3.13.10	Paragraph 18.3.21	Baseline - Shoreline Management Plan (SMP)	The Applicant's attention is directed to the comments of the EA and ESC (Appendix 2 of this Opinion) with regards to the current policy for shoreline management relevant to the Proposed Development. The ES should include up-to-date information in respect of areas of shoreline management.
3.13.11	Paragraph 18.3.35	Baseline – designated bathing waters	A figure should be provided to illustrate the location of designated bathing waters in relation to the study area.
3.13.12	Paragraphs 18.3.40 to 18.3.42	Baseline - sediment quality	The CEFAS Action Levels are not explained in the context of the rationale presented. The ES should include this information. The monitoring and grab sampling locations should be shown on a plan and the ES should explain why the data can be relied upon as representative of the study area.
3.13.13	Paragraph 18.3.43	Baseline – protected species/ sites	The Scoping Report contains errors in the list of sites and qualifying/ interest features. For example, the Annex 1 habitat biogenic reef is absent from this list but identified in the Scoping Report as being

ID	Ref	Description	Inspectorate's comments
			within the study area. The ES should include complete information on protected sites and features considered in this aspect.
3.13.14	Paragraph 18.6.7	Receptors – coastline	The description of this likely receptor for the marine physical processes impact assessment is currently vague. The ES should clearly describe the extent of the coastline receptor with reference to specific areas and be accompanied by a suitable figure for clarity.
3.13.15	Table 18-4	Coastal defence structure	The Scoping Report refers to a man-made coastal defence structure at the mouth of the River Blyth but limited information is provided about the condition of the defence. Existing physical coastal defences should be described in the ES. Given the likelihood of changes to sea defences, both through ongoing active maintenance and the deterioration of these types of structures that could be expected over time, the ES should review the available information to ensure that it represents a robust basis for the assessment. The Applicant's attention is also directed to the comments of the EA (Appendix 2 to this Opinion), which describe that this structure is a training bank to maintain the mouth of the river and not a coastal defence structure.
3.13.16	Table 18-4	Coastal morphology during operation	It is unclear from Table 18-4 if this matter is proposed to be scoped in or out of the assessment. The Inspectorate advises that this matter should be scoped into the assessment or that the ES should present demonstrate an absence of likely significant effects, with evidence of agreement from relevant consultation bodies.
3.13.17	Table 18-5	Data sources	The Applicant's attention is directed to the comments of ESC (Appendix 2 to this Opinion) with regards to additional sources of data for the impact assessment, including the Anglian Coastal Monitoring programmes (ACMP) open source data.

ID	Ref	Description	Inspectorate's comments
3.13.18	Paragraph 18.7.16	Numerical hydrodynamic modelling	<p>It is stated that no new modelling is proposed considering the low percentage of fines present in the sediments and the availability of a large evidence base including multiple similar assessments.</p> <p>The assessment in the ES should either be based on updated numerical modelling covering the area affected by the Proposed Development or give a justification as to why use of the existing modelling provides a robust approach, supported by evidence of agreement with relevant consultation bodies.</p>



### 3.14 Offshore: intertidal and subtidal benthic ecology

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paragraph 19.3.29	Indirect impacts to the Orford Inshore Marine Conservation Zone (MCZ)	The Inspectorate agrees that indirect impacts to the MCZ can be scoped out of the assessment based on its distance from the study area boundary (being 8.5km at the closest point), which is stated to be beyond the maximum ZoI.
3.14.2	Table 19-5	Effects to intertidal and nearshore habitats from temporary habitat loss/ seabed disturbance during construction and operation	<p>The Scoping Report states that HDD technology would be used to avoid the intertidal area (whether Southwold or Walberswick is selected) and that the onshore scoping boundary lies above mean high water springs (MHWS) and outside of the intertidal zone. However, it is also stated that there could be access to the intertidal area for construction works. Paragraph 2.3.90 of the Scoping Report notes potential for a cofferdam at the HDD exit point, this is not referenced in Table 19-5.</p> <p>The Inspectorate considers that there is insufficient detail about the construction activities that might be needed to facilitate transition between the onshore and offshore components, and whether these could lead to significant effects from temporary habitat loss or seabed disturbance. In addition, the feasibility of HDD has not yet been demonstrated. The ES should include an assessment of construction phase effects, where significant effects are likely to occur. It is also noted that permanent habitat loss to these habitats is not referenced and thus it is not explained whether such an impact could occur. The ES should include an assessment of permanent loss of intertidal and nearshore habitats during construction and operation, where likely significant effects could occur.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>On the basis that there would be no requirement for repair to HDD ducts in the intertidal and nearshore area (with any new HDD duct installation being subject to a separate consenting and assessment process), the Inspectorate agrees that significant effects during operation are unlikely if HDD and this matter can be scoped out of the assessment.</p>
3.14.3	Table 19-5	Effects to subtidal - broadscale habitats from temporary habitat loss/ seabed disturbance during construction and operation	<p>The Scoping Report seeks to scope this matter out on the basis that commonly occurring infralittoral and circalittoral habitats are widely distributed in the Southern North Sea region have low sensitivity to abrasion and penetration, with recovery from any impacts likely to occur in the short-term.</p> <p>The Inspectorate notes that there is limited information about the potential cable burial techniques, which are not yet decided, and that short-term could encompass up to 7 years (Table 19-7), the Inspectorate does not have confidence that the possibility of likely significant effects can be excluded. This matter should be scoped into the assessment.</p>
3.14.4	Table 19-5	Effects to subtidal – Annex I habitats from temporary habitat loss/ seabed disturbance during operation	<p>The Scoping Report seeks to scope this matter out on the basis that any remedial works required as part of repair and maintenance would be of lower magnitude than construction works during installation.</p> <p>Noting that there is limited information about how remedial works would be carried out nor the expected frequency, and to what extent these are of reduced magnitude than construction works, and the high importance of the habitat, the Inspectorate advises that this matter should be assessed in the ES.</p>
3.14.5	Table 19-5	Effects to subtidal habitats and species from temporary increase and deposition of suspended	<p>The Scoping Report seeks to scope this matter out for similar reasons as discussed at ID 3.13.3 of this Opinion. The Inspectorate's comments at ID 13.3.3 apply equally to this matter. The Inspectorate</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		sediments during construction and operation (excluding pre-sweeping)	advises that this matter should be scoped into the assessment or the ES should demonstrate, with evidence of agreement from relevant consultation bodies, that likely significant effects would not occur.
3.14.6	Table 19-5	Effects to subtidal species from changes in underwater noise during construction and operation	<p>The Scoping Report proposes to scope this matter out on the basis that the type and duration of underwater sound that will be generated by the Proposed Development will not have any significant effects on benthic invertebrates or benthic communities.</p> <p>In the absence of confirmed construction details (including activities associated with repair during operation) the Inspectorate considers that this matter should be scoped in for assessment.</p>
3.14.7	Table 19-5	Effects to subtidal species from introduction or spread of MINNS during construction and operation	<p>The Scoping Report states that control measures, including a biosecurity plan (as described at paragraph 19.5.4 of the Scoping Report), mean introduction of MINNS through ship hulls and ballast water or external cable protection are highly unlikely to result in significant effects.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the mitigation measures proposed should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.</p>
3.14.8	Table 19-5	Effects to intertidal and subtidal habitats and species from changes in marine water quality (from accidental spills or increase in suspended sediment) during construction and operation	The Scoping Report proposes to scope this matter out on the basis that the control and management measures proposed (as described at section 19.5 of the Scoping Report) mean that only inert (non-toxic), biodegradable drilling fluid will be used and disposed of at a licenced disposal site and that any spills would be small in extent and subject to immediate control, for example in accordance with a proposed MPCP.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>For accidental spills, including release of drilling fluid, the Inspectorate agrees that this matter can be scoped out on the basis that the control and management measures should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.</p> <p>The Inspectorate advises that potential changes in marine water quality arising from increases in suspended sediment concentrations should be assessed noting that this impact pathway is scoped in given the potential for likely significant effects (Table 19-5 of the Scoping Report and ID 3.14.5 of this Scoping Opinion).</p>
3.14.9	Table 19-5	Effects to subtidal habitats and species from temperature increases during operation	<p>The Scoping Report seeks to scope this matter out on the basis that temperature changes would be localised around the cable and undetectable against natural temperature fluctuations. Reference is made to calculations for Viking Link, which demonstrate that heating more than 2°C at 20cm sediment depth would only occur if cables were buried to less than 0.75m.</p> <p>In the absence of the CBRA and information to demonstrate that cable burial depths of more than 0.75m can be achieved, the Inspectorate does not have sufficient justification to exclude the possibility of likely significant effects. This matter should be scoped into the assessment or the ES should demonstrate, with evidence of agreement from relevant consultation bodies, an absence of likely significant effects.</p>
3.14.10	Table 19-5	Transboundary effects from the impact pathways described at ID 3.14.3 to ID 3.14.6	<p>The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.2 of this Scoping Opinion.</p>

ID	Ref	Description	Inspectorate's comments
3.14.11	Section 19.7	Site specific survey	<p>The Scoping Report proposes site specific surveys including geophysical survey/ grab sampling. It is stated that no Phase 1 habitat walkover survey of the intertidal area is proposed as a trenchless installation method is proposed in the intertidal area, and characterisation will be based on the subtidal methodology.</p> <p>The Inspectorate notes that it has not yet been demonstrated that a trenchless installation method is feasible and that there remains uncertainty about whether access to the intertidal area may be required for other activities during construction. As such, the Inspectorate considers that the rationale presented for not undertaking as walkover survey is insufficient.</p> <p>The Inspectorate advises that effort should be made to agree the approach to characterisation of the benthic ecology baseline, including the extent and method of surveys, with relevant consultation bodies including NE and Joint Nature Conservation Committee (JNCC). Baseline data should be sufficient to enable a robust impact assessment in the ES.</p>

### 3.15 Offshore: fish and shellfish

(Scoping Report Section 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 20-8	Effects to species with fully pelagic lifecycle from temporary habitat loss/ seabed disturbance during construction and operation	<p>The Scoping Report proposes to scope this matter out on the basis that species whose lifecycle is within the water column not on the seabed will not be significantly affected by seabed disturbance.</p> <p>The Inspectorate is unclear from the information presented which species are proposed to be scoped out. It is also noted from the description in paragraphs 20.3.23 to 20.3.45 of the Scoping Report and Table 20-6 that the offshore scoping boundary contains spawning grounds for several pelagic species, which use the seabed.</p>
3.15.2	Table 20-8	Effects to species with fully pelagic lifecycle from permanent habitat loss during construction and operation	<p>On that basis, and in the absence of findings from the marine physical environment assessment and information demonstrating clear agreement with the relevant statutory bodies, the Inspectorate is not able to agree to scope this matter out of assessment at this stage. This ES should include an assessment where significant effects are likely to occur.</p>
3.15.3	Table 20-8	Effects to species with fully pelagic lifecycle from temporary increase and deposition of suspended sediments from pre-sweeping during construction and operation	<p>In the absence of findings from the marine physical environment assessment and information demonstrating clear agreement with the relevant statutory bodies, the Inspectorate is not able to agree to scope this matter out of assessment at this stage. This ES should include an assessment where significant effects are likely to occur.</p>
3.15.4	Table 20-8	Effects to all species from temporary increase and deposition of suspended sediments from seabed preparation (excluding pre-	<p>The Scoping Report seeks to scope this matter for similar reasons as discussed at ID 3.13.3 of this Opinion. The Inspectorate's comments at ID 13.3.3 apply equally to this matter. The Inspectorate advises that this matter should be scoped into the assessment or the ES</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		sweeping) and cable burial during construction and operation	should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.
3.15.5	Table 20-8	Effects to all species from underwater noise change due to the presence of project vessels and equipment during construction and operation	<p>The Scoping Report states that all construction and maintenance/repair activities generate underwater noise but that significant effects are not likely as construction effects would be localised and short-term. It is stated that operational effects from vessels would be at a lower magnitude than construction.</p> <p>The Scoping Report does not provide sufficient justification to exclude the possibility of likely significant effects. It is unclear whether any of the receptors are sensitive to underwater noise. No information has been presented about the predicted noise levels or duration of activities required, such as vessel movements, seabed preparation and cable burial. The justification for operational phase effects refers only to vessel noise but if repair works are required, the Inspectorate understands that such activity would generate underwater noise.</p> <p>The Inspectorate advises that this matter should be scoped into the assessment or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>
3.15.6	Table 20-8	Effects to all species from accidental spills during construction and operation	<p>The Scoping Report proposes to scope this matter out on the basis that all project vessels and contractors will comply with the MARPOL 73/78 and all vessels are legally required to have a SOPEP. There is a commitment to only use inert or biodegradable drilling fluid.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the control and management measures should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.7	Table 20-8	Effects to all species from introduction or spread of MINNS during construction and operation	<p>The Scoping Report states that relevant guidelines will be followed including vessel cleaning and use of anti-fouling paint. It is stated that all vessels will complete a biosecurity risk assessment and will comply with the International Convention for the Control and Management of Ships' Ballast water and sediments.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the mitigation measures proposed should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is secured with reference to relevant documents, for example a CoCP.</p>
3.15.8	Table 20-8	Effects to all basking shark from collision risk during construction and operation	Based on the limited number of basking shark sightings and limited number of vessel movements predicted as described in the Scoping Report, the Inspectorate agrees that significant effects are not likely to occur and this matter can be scoped out of the assessment.
3.15.9	Table 20-8	Effects to fish and shellfish species with demersal life stage from temperature increase due to the presence of cables during operation	Please refer to the Inspectorate's comments at ID 3.14.9 of this Scoping Opinion, which also apply to this matter. This matter should be scoped into the assessment or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.
3.15.10	Table 20-8	Transboundary effects from the impact pathways described at ID 3.15.4 to ID 3.15.6	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.2 of this Scoping Opinion.



ID	Ref	Description	Inspectorate's comments
3.15.11	Paragraphs 20.3.3 to 20.3.5	Study area	The Scoping Report states that a more regional approach will be used to screen any designated sites, with 100km proposed as an initial screening distance. The Scoping Report does not explain how this regional approach would be employed to decide which additional sites could be affected. The Applicant is advised to agree which designated sites should be included with relevant consultation bodies; the ES should explain how these sites have been identified.
3.15.12	Table 20-5	Potential effects to shellfish and marine species with demersal life stage from increase and deposition of suspended sediments – contaminated sediments	Whilst this matter is shown as being scoped in, the Scoping Report states that suspension of contaminated sediments is not considered a significant risk for the Proposed Development and the Inspectorate is unclear whether it is proposed to assess this matter in the ES. The Inspectorate's comments at ID 3.13.3 regarding contaminated sediments also apply to this matter.
3.15.13	Section 20.7	Baseline data	The Scoping Report describes a range of desk-based sources to be used, including data collected for nearby offshore wind farm projects. Some of the datasets proposed to inform the baseline are more than 10 years old. The Applicant should ensure that the baseline data used in the ES assessments are sufficiently up to date to provide a robust baseline. If primarily existing data is to be used, the ES should provide evidence to justify that it constitutes a robust characterisation of the receiving environment, with reference to the date, seasonal period, and geographic coverage of the data. Use of existing data should be done in agreement with relevant consultation bodies.
3.15.14	Section 20.7	Assessment methodology	The Scoping Report provides limited description of the methods that will be used to assess impacts and if these will be quantitative or qualitative, other than paragraph 20.7.18 stating that where impacts are not predicted to be significant, simple assessments using an evidence-based, proportionate approach would be undertaken.

ID	Ref	Description	Inspectorate's comments
			The methodologies used must be described and their use justified with reference to appropriate guidance and/or agreement with relevant consultation bodies.
3.15.15	N/A	Effects to the Alde and Ore waterbody and smelt	The Applicant's attention is drawn to the consultation response from the EA (Appendix 2 of this Opinion). The ES should provide an assessment of effects on migratory fish species (particularly smelt) that pass through or are present in the Alde and Ore waterbody, as well as an assessment of effects to migrating smelt.
3.15.16	N/A	Eels	The Applicant's attention is drawn to the consultation response from the EA (Appendix 2 of this Opinion). The ES should provide an assessment of effects on eels or otherwise demonstrate absence of LSE, with evidence of agreement from relevant consultation bodies.

### 3.16 Offshore: intertidal and offshore ornithology

(Scoping Report Section 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 21-6	Effects to terns, gulls, kittiwakes and gannets from visual/ physical disturbance or displacement during construction and operation	<p>The Scoping Report seeks to scope this matter out on the basis that kittiwakes and gannet are not protected species for any of the designated sites in the study area, and that these species are low to moderately sensitive to noise and visual disturbance.</p> <p>The Inspectorate notes that Table 21-3 of the Scoping Report indicates that kittiwake is present in the study area; please see the Inspectorate's comments at ID 3.16.11 regarding bird species to be included in the assessment.</p> <p>Whilst noting that published evidence referred to in Table 21-2 of the Scoping Report suggests that these species are of low to moderate sensitivity to noise and visual disturbance, no information is presented about the predicted noise levels, duration or timing of activity associated with construction and operational repair. The Inspectorate does not therefore have sufficient justification to exclude the possibility of likely significant effects. The ES should include an assessment of this matter or otherwise demonstrate, with evidence of agreement from relevant consultation bodies, an absence of likely significant effects.</p>
3.16.2	Table 21-6	Effects to divers, grebes and mergansers from temporary increase and re-deposition of suspended sediments during construction and operation	<p>The Scoping Report seeks to scope these matters (ID 3.16.2 to 3.16.5) out based on information presented in Chapter 18 Marine Physical Environment, which presents evidence to suggest that sediment plumes would be rapidly dissipated. In addition, it is stated</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.3	Table 21-6	Effects to seaducks, geese and swans from temporary increase and re-deposition of suspended sediments during construction and operation	<p>that the cable corridor is sufficiently narrow that alternative feeding grounds and prey species would be available.</p> <p>The Inspectorate has not agreed to scope out effects from increase and deposition of suspended sediments (see ID 3.13.3). Limited information is presented to support the assertion that alternative feeding grounds are available.</p>
3.16.4	Table 21-6	Effects to auks from temporary increase and re-deposition of suspended sediments during construction and operation	<p>In the absence of assessment findings for the marine physical environment, benthic ecology and fish, including how prey resource might be affected by the Proposed Development, and without evidence demonstrating clear agreement with the relevant statutory bodies, the Inspectorate is not able to agree to scope these matters out of the assessment at this stage. The ES should include an assessment where significant effects are likely to occur.</p>
3.16.5	Table 21-6	Effects to terns, gulls, kittiwakes and gannets from temporary increase and re-deposition of suspended sediments during construction and operation	<p>The Inspectorate does agree, however, that gulls do not need to be considered in the assessment on the basis that they do not dive for food and are absent from the study area.</p>
3.16.6	Table 21-6	Effects to waders and harriers from temporary increase and re-deposition of suspended sediments during construction and operation	<p>The Inspectorate agrees that this matter can be scoped out of the assessment on the basis that wading birds and harriers do not dive for food and would not be affected by temporary changes in water clarity from increased suspended solids.</p>
3.16.7	Table 21-6	Effects to all bird species from changes in distribution of prey or target species from temporary loss of habitat (excluding external cable protection) during construction and operation	<p>The Scoping Report states that pre-sweeping and cable burial will cause a localised temporary habitat loss over a small area of seabed relative to alternative foraging areas available. It is stated that the habitat would recover in a relatively short timeframe.</p> <p>The Inspectorate notes that temporary habitat loss is scoped in for the marine physical environment (Table 18-4 of the Scoping Report). The Inspectorate has not agreed to scope out temporary habitat loss for benthic ecology (see ID 3.14.2 to 3.14.4 of this Opinion) and</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>notes that the Applicant has proposed to scope in effects from pre-sweeping. Limited information is presented to support the assertion that alternative foraging areas are available. The Inspectorate does not have confidence that the potential for significant effects can be excluded and does not agree that this matter can be scoped out. The assessment should consider effects arising from deployment of additional cable protection during operation of the Proposed Development, which could also impact prey availability.</p>
3.16.8	Table 21-6	Effects to all bird species from accidental spills	<p>The Scoping Report proposes to scope this matter out on the basis that all project vessels and contractors will comply with MARPOL 73/78. Regarding management of accidental spills, the Inspectorate notes that elsewhere in the Scoping Report it is stated that all vessels are legally required to have a SOPEP and there is a commitment to only use inert or biodegradable drilling fluid.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the control and management measures should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.</p>

ID	Ref	Description	Inspectorate's comments
3.16.9	Paragraph 21.5.4	Control measures	<p>It should be clear in the ES how implementation of NE's <i>'Best Practice Protocol for Vessels in Red-throated Diver SPAs'</i> would be secured through the dDCO.</p>
3.16.10	Table 21-6	Visual/ physical disturbance or displacement	<p>For the avoidance of doubt, as it is not specifically stated in Table 21-6, the Inspectorate understands that physical disturbance or</p>

ID	Ref	Description	Inspectorate's comments
			displacement will include assessment of noise impacts, including underwater sound.
3.16.11	Table 21-6	Bird species to be considered in the assessment	The Inspectorate does not consider that only species of designated sites should be assessed; as a minimum, the ES should also assess effects on species present within the ZoI that are legally protected or which qualify as species of principal importance.
3.16.12	Paragraph 21.7.2	Offshore bird surveys	<p>The Scoping Report states that offshore bird surveys are not considered necessary on the basis that construction works would be temporary and transient. Table 21-7 of the Scoping Report indicates that reference will also be made to data collected from nearby offshore windfarm projects.</p> <p>Paragraph 21.2.2 of the Scoping Report describes concerns raised by relevant consultation bodies during non-statutory consultation about potential impacts to red-throated diver of the Outer Thames Estuary SPA and the need to ensure that data on species distribution and density is adequate and current, especially in relation to red-throated diver. It is stated that the feedback led to changes in the position of the offshore cable corridor, but it is unclear as to how, or if, this would have resolved the concerns raised.</p> <p>The impact assessment in the ES must be undertaken based on a robust understanding of the baseline environment. Effort should be made to agree the method of establishing the baseline, including the requirement for site specific surveys, with relevant consultation bodies including the JNCC and NE. The ES should include evidence of agreement or otherwise regarding the approach.</p>
3.16.13	Paragraphs 21.7.5	Intertidal bird surveys	The Scoping Report describes the proposed scope and method of intertidal bird surveys, which are proposed to continue for 12 months. It is stated that the survey methodology is based on guidance for onshore wind farms provided by Scottish Natural Heritage (SNH) in

ID	Ref	Description	Inspectorate's comments
			<p>the absence of a clearly defined methodology for land-based inshore bird surveys for interconnector projects.</p> <p>For the avoidance of doubt, the Inspectorate understands that the survey effort will also cover waterbirds that may be using the intertidal habitat.</p> <p>Effort should be made to agree the survey method and scope with relevant consultation bodies; evidence of agreement should be presented in the ES. If the SNH guidance is used as the basis for the survey methodology, the ES should provide a detailed explanation of why its use is appropriate for the Proposed Development.</p>
3.16.14	Section 21.7 and Table 21-7	Data sources	<p>The ES must present the baseline data clearly, including information on the location of the vantage points used in the bird surveys, and predicted numbers of individuals of each species likely to be affected by the Proposed Development. The ES must also explain how the baseline data has been derived from published sources.</p> <p>Table 21-7 does not refer to data that may be available from the Wetland Bird Survey (WeBS), on the British Trust for Ornithology (BTO) website, or further JNCC sources such as the atlas of seabird distribution. The ES should include data from these sources where relevant.</p>
3.16.15	Tables 21-8 and 21-9	Assessment criteria	<p>The Inspectorate is unclear where the proposed assessment criteria is derived from. The ES should provide a justification as to why the proposed criteria is appropriate as a basis for determining likely significant effects, including reference to relevant guidance. The following factors should be addressed:</p> <ul style="list-style-type: none"> <li>▪ species that are not connected with an international or nationally designated site should be included, eg those that benefit from other legal protections or are priority species;</li> </ul>

ID	Ref	Description	Inspectorate's comments
			<ul style="list-style-type: none"> <li>▪ clarification as to how value and sensitivity would be assigned to habitats used by birds;</li> <li>▪ clarification as to what is meant by activity outside of a sensitive season, and why it would be appropriate to downgrade the value of qualifying features of international or nationally designated sites on that basis;</li> <li>▪ the information that would be used to ascertain tolerance of disturbance in determining sensitivity; and</li> <li>▪ explanation of the approach if there is an overlap in description between categories, ie confirm that the higher category would be assigned as a worst case.</li> </ul> <p>The ES should confirm how effect significance is proposed to be determined.</p>
3.16.16	Paragraphs 21.7.12 to 21.7.14	Assessment methodology	<p>The Scoping Report presents limited information on the methods proposed to assess impacts, other than confirming that results from sediment dispersion modelling and sandeel and Atlantic herring habitat assessment would be used. Paragraph 21.7.14 also states that where impacts are not predicted to be significant, simple assessments using an evidence-based, proportionate approach would be undertaken. No information is presented about visual/ physical impacts would be assessed.</p> <p>This is a matter of some concern to the Inspectorate, given that the Proposed Development passes through a section of the Outer Thames Estuary SPA. The SPA qualifying features include species such as red-throated diver which are known to be vulnerable to disturbance and could be affected by construction and maintenance activities. The ES should clearly describe the methods used to quantify the extent of disturbance to the qualifying features. The methodologies used must</p>



ID	Ref	Description	Inspectorate's comments
			<p>be described and their use justified with reference to appropriate guidance and/ or agreement with relevant consultation bodies.</p> <p>The Applicant's attention is drawn to the comments of JNCC (Appendix 2 of this Scoping Opinion) regarding the proposed assessment method for disturbance effects to red-throated diver.</p>
3.16.17	N/A	Figures	<p>The ES should include a figure illustrating any international and national designated sites with bird qualifying features that are located within the study area.</p>

### 3.17 Offshore: marine mammals and marine reptiles

(Scoping Report Section 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Table 22-5	Visual disturbance to otter during construction and operation	<p>The Scoping Report seeks to scope this matter out on the basis that otter is unlikely to forage at distance greater than 100m from the coastline and offshore activities are generally at a greater distance.</p> <p>The Inspectorate agrees that significant effects are not likely to occur to otter for offshore activities beyond the stated foraging distance; however, it is unclear whether otter using intertidal areas could be affected and, if so, where this is proposed to be assessed. The Scoping Report does not provide sufficient justification to scope this matter out. The Inspectorate advises that an assessment should be provided, or the ES should otherwise explain, with evidence of agreement from relevant consultation bodies, why significant effects are not likely to occur.</p>
3.17.2	Table 22-5	Underwater noise change to cetaceans and pinnipeds from presence of vessels and equipment during construction and operation	<p>The Scoping Report describes that the Oslo and Paris (OSPAR) Convention considered sound associated with installation, removal or operation of submarine cables to be less harmful than impulsive sound such as seismic surveys, military activities or pile driving. It is stated that evidence from noise modelling on offshore wind farm projects concluded that animals would need to remain closer than 100m to the source continuously for 24 hours to be exposed to levels sufficient to cause injury.</p> <p>Limited information is presented with regards to the equipment involved and noise levels for seabed preparation and cable lay and burial activities, together with baseline noise levels, to support the scoping out of this matter. It is also noted that cable installation methods have not yet been selected.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate does not have sufficient justification to agree to scope out this matter at this stage. The ES should include an assessment of effects on marine mammals arising from these activities or otherwise explain, with evidence of agreement from relevant consultation bodies, significant effects are not likely to occur. The Inspectorate's comments regarding UXO are provided at ID 2.1.14 of this Opinion.</p> <p>Notwithstanding that geophysical surveys may benefit from an exemption from requiring a marine licence, the Inspectorate advises that any likely significant effects arising from underwater noise associated with pre- and post-installation surveys should also be assessed in the ES.</p>
3.17.3	Table 22-5	Effects to cetaceans and pinnipeds from collision with vessels during construction and operation	<p>The Scoping Report seeks to scope this matter out on the basis that key factors contributing to collision between mammals and vessels are the presence of mammals and vessels in the same area and vessel speed. It is stated that vessel speeds would be below the 14 knots at which fatal collisions occur; vessels in transition would use commercial shipping routes where possible.</p> <p>Paragraph 2.4.24 of the Scoping Report describes the likely types of vessels to be used for the Proposed Development, but information about the likely numbers of vessels is limited. It does not present any evidence about risk of injury from collision as opposed to fatality. In the absence of sufficient justification, the Inspectorate cannot agree to scope out this matter.</p> <p>The ES should clearly describe the likely number of vessels to be used during construction and the associated risk to marine mammals. An assessment of collision impacts on marine mammals should be included, where significant effects are likely to occur.</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.17.4	Table 22-5	Effects from accidental spills to all species during construction and operation	<p>The Scoping Report proposes to scope this matter out on the basis that all project vessels and contractors will comply with the MARPOL 73/78 and all vessels are legally required to have a SOPEP. The Inspectorate notes that elsewhere in the Scoping Report it is stated that there will be a commitment to only use inert or biodegradable drilling fluid.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis that the control and management measures should be sufficient to address the likely impacts and avoid a likely significant effect. The ES should include details of the mitigation and explain how its delivery is assured with reference to relevant documents.</p>
3.17.5	Table 22-5	Effects from thermal increases to all species during operation	<p>The Scoping Report seeks to scope out this matter on the grounds that temperature changes will be localised to the immediate environment surrounding the cable and undetectable against fluctuations in the water column. The Inspectorate agrees that this matter can be scoped out of further assessment in the ES.</p>
3.17.6	Table 22-5	Transboundary effects from the impact pathway described at ID 3.17.2	<p>The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.2 of this Scoping Opinion.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.17.7	Paragraph 22.5.4	Control measures	<p>It should be clear in the ES how implementation of the JNCC suite of mitigation guidelines to reduce impacts from impulsive noise and recording of activities that produce loud, low to medium frequency impulsive noise in the UK Marine Noise Registry would be secured through the dDCO.</p>

ID	Ref	Description	Inspectorate's comments
3.17.8	Table 22-5	Effects arising from changes in prey availability	For the avoidance of doubt, consideration should be given to the potential for prey availability to be affected by permanent habitat loss arising from the need for external cable protection in the Southern North Sea SAC.
3.17.9	Table 22-7	Receptor value and sensitivity criteria	The Inspectorate is unclear where the proposed assessment criteria is derived from. The ES should provide a justification as to why the proposed criteria is appropriate as a basis for determining likely significant effects, including reference to relevant guidance. It should be clear how value would be assigned for species that are connected with an international or nationally designated site and/ or species that benefit from other legal protections or are priority species.
3.17.10	Paragraph 22.7.1	Site-specific mammal surveys	The Scoping Report states that no site-specific surveys are proposed given the extensive information available from public data sources. The Inspectorate is content with this approach.
3.17.11	Paragraph 22.7.9	Proposed assessment methodology	Limited description has been provided of the methods that will be used to assess impacts and whether these will be quantitative or qualitative. Unless otherwise agreed with relevant consultation bodies (and evidence of that agreement is provided in the ES), the assessment should include modelling of underwater noise propagation during construction and the area affected by increased noise levels should be shown on figures within the ES.

### 3.18 Offshore: shipping and navigation

(Scoping Report Section 23)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.18.2	Paragraph 23.3.4	Study area	The Scoping Report states that the 5 nautical mile (nm) buffer around the offshore scoping boundary is sufficient to characterise the relevant baseline conditions for the assessment but does not explain why. The ES should clearly justify why the final extent of the study area reflects the ZoI of the Proposed Development and, where possible, it should be agreed with the relevant consultation bodies.
3.18.3	Paragraph 23.7.10	Assessment methodology	The Scoping Report proposes to determine significance as either broadly acceptable, tolerable, or unacceptable in line with the International Maritime Organisation's (IMO) Formal Safety Assessment (FSA) methodology. The ES should clearly set out how the risk assessment approach leads to an assessment of significance of effect that is consistent/ compatible with the terminology used in the ES, for which the intended approach is set out in Chapter 5 (Section 5.5) of the Scoping Report

### 3.19 Offshore: commercial fisheries

(Scoping Report Section 24)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.19.2	Paragraph 24.4.3	Potential impacts	The Scoping Report states that the potential impacts on commercial fish species will be addressed in the Fish and Shellfish ES Chapter and any impacts to the navigation abilities of fishing vessels will be assessed in the Shipping and Navigation ES Chapter. The ES should provide clear cross-referencing to where relevant impacts on commercial fisheries has been assessed.
3.19.3	Section 24.7	Assessment methodology	The Scoping Report identifies the data sources that would be used to inform the baseline and describes the criteria that would be used to determine the sensitivity of receptors and magnitude of impacts. However, it is not clear from the Scoping Report what methods would be used to carry out the assessment and whether the assessments would be qualitative or quantitative. The methodologies used must be described and their use justified with reference to appropriate guidance and/ or agreement with relevant consultation bodies.  The Applicant is encouraged to ensure that they seek advice from all relevant stakeholders with expertise on this aspect, including the appropriate Inshore Fisheries and Conservation Authorities (IFCAs).
3.19.4	N/A	Mitigation – timing of works	The Scoping Report states that the ES will assess the potential for the Proposed Development to temporarily disrupt fishing activities (including restriction of access) during both the construction and

ID	Ref	Description	Inspectorate's comments
			operational phases. The Inspectorate advises that the Applicant should consider the timing of any proposed construction and/ or operational maintenance activities as to avoid key periods relating to commercial fishing activities.



### 3.20 Offshore: other marine users

(Scoping Report Section 25)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.20.1	Paragraphs 25.4.3 to 25.4.4	Impacts to recreational users (diving and water sports) during construction	<p>The Scoping Report states that the other marine users' assessment focuses on impacts relating to occupancy of the seabed and that effects to recreational users (diving and water sports) would be captured in the Socio-economics, Recreation and Tourism ES Chapter.</p> <p>The Socio-economics, Recreation and Tourism section of the Scoping Report (section 16) relates to onshore receptors and does not refer to diving and water sports.</p> <p>The Scoping Report does not provide sufficient justification for the Inspectorate to agree to scope this matter out. The ES should include an assessment of effects to diving and water sports' recreational users, where significant effects are likely to occur. Consideration should be given to impact pathways including increased vessel traffic, increase in suspended sediment and subsea noise.</p>
3.20.2	Table 25-6	Impacts from dumped munitions and UXO	<p>The Scoping Report states that there is potential for dumped munitions within the study area. An UXO survey is proposed to be undertaken prior to construction of the selected offshore cable corridor to ensure that any potential UXO has been identified, investigated and cleared. As noted in ID 2.1.14 of this Opinion, the ES should include a high level assessment of likely significant effects associated with UXO clearance. The Inspectorate does not agree that this matter can be scoped out of the assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.20.3	Paragraph 25.3.4	Study area	<p>A 10km buffer around the offshore scoping boundary was used to search for relevant other marine users. No justification is provided to explain why this is a suitable study area for the assessment.</p> <p>The ES should clearly justify why the final extent of the study area reflects the potential ZoI of the Proposed Development for the other marine user receptors. Effort should be made to agree the final study area with relevant consultation bodies.</p>
3.20.4	Paragraph 25.3.12 and Table 25-6	Effects to existing spoil disposal sites	<p>Paragraph 25.3.12 of the Scoping Report states that 11 spoil disposal sites were identified within the study area; however, Table 25-6 (proposed assessment scope) does not refer to an assessment of spoil disposal sites.</p> <p>The ES should assess the potential impacts on existing spoil disposal sites from the seabed occupancy of the Proposed Development, where significant effects are likely to occur.</p>
3.20.5	Paragraph 25.4.14 and Figure 25-2	Figures	<p>Paragraph 25.3.14 of the Scoping Report states that the 11 dumped munition locations within the study area are illustrated on Figure 25-2 (Offshore Figures). The locations are not clear from Figure 25-2.</p> <p>A figure should also be provided to illustrate the location of recreational diving sites in relation to the offshore scoping boundary.</p> <p>The Applicant should ensure that any ES figures are clear and consistent with the textual descriptions. Figures should be of an appropriate scale and shading to allow each element on the figure to be clearly distinguishable and include clear keys/ legends and labels.</p>
3.20.6	Paragraph 25.4.3	Potential impacts	<p>The Scoping Report explains that the potential impacts on other marine users transiting through the study area from licensed areas to ports will be assessed through the Shipping and Navigation ES</p>

ID	Ref	Description	Inspectorate's comments
			Chapter. The ES should provide clear cross-referencing to where relevant impacts on other marine users has been considered.
3.20.7	N/A	Aquaculture	The Scoping Report makes no mention of the aquaculture industry as a potential receptor, and it is not addressed in the Commercial Fisheries section of the Scoping Report (section 24). The ES should assess the impacts from the Proposed Development to the aquaculture sector, where significant effects are likely to occur.
3.20.8	N/A	Impacts to other marine users below Mean High-Water Spring (MHWS)	The Applicant's attention is drawn to the consultation response from the Maritime and Coastguard Agency (Appendix 2 of this Opinion). The ES should confirm whether any proposed works to facilitate the Proposed Development will be undertaken below the MHWS within the Hundred River, River Minsmere, River Blyth or River Wang. The impact of any potential works on other marine users below the MHWS within any of these rivers should be assessed in the ES. Where significant effects could occur

### 3.21 Offshore: marine archaeology

(Scoping Report Section 26)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.21.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.21.2	Paragraphs 26.3.9, 26.3.40 and 26.3.41	Historic seascape character	The Scoping Report states that that historic seascape character is relevant to marine archaeological resource. However, the potential impact pathways to historic seascape character effects have not been described. The ES should provide an assessment of effects to historic seascape character, where significant effects are likely to occur. The Applicant's attention is drawn to Historic England's comments (Appendix 2 of this Opinion) regarding how historic seascape characterisation should be used to inform the assessment.
3.21.3	Section 26.5	Mitigation measures	<p>It is noted that the mitigation measures likely to be considered include production of a Written Scheme of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD) as well as the implementation of Archaeological Exclusion Zones (AEZs).</p> <p>The Inspectorate advises that the strategy for mitigation should be fully described in the ES, including the details relating to any proposed AEZs and the proposed mechanism for securing them.</p> <p>The Inspectorate advises that the Applicant should make effort to agree the proposed WSI with relevant consultation bodies, to enable the scope of archaeological investigation and mitigation to be determined and secured.</p>

ID	Ref	Description	Inspectorate's comments
3.21.4	Section 26.7	Assessment criteria	Table 26-4 of the Scoping Report describes how the value of marine archaeological assets has been defined. However, no information has been provided to define the magnitude of change/ impact to receptors. Moreover, the Scoping Report does not explain how the value of receptors and magnitude of change would be used to determine effect significance. This should be clearly set out in the ES with reference to relevant guidance.
3.21.5	Paragraphs 26.7.2 to 26.7.3	Survey data	<p>The Scoping Report states that geophysical survey data would be subject to archaeological assessment and that the palaeogeography baseline will be based on geoarchaeological review of the geotechnical and geophysical datasets gathered.</p> <p>Effort should be made to agree the survey scope and method with relevant consultation bodies, including Historic England. This applies equally to surveys that are primarily to inform other aspects but would also be used for marine archaeology. The Applicant's attention is drawn to the comments of Historic England (Appendix of this Opinion) regarding the need for dedicated cores to inform assessment if significant deposit remains are identified in the study area.</p>
3.21.6	Table 26-2	Indirect impacts on intertidal heritage receptors	For the avoidance of doubt, the Inspectorate understands that the assessment of indirect impacts arising from hydrodynamic changes and sedimentary regimes during construction and operation will include consideration of receptors within the intertidal area.
3.21.7	N/A	Baseline data sources and information gathering	The Applicant's attention is drawn to Historic England's comments (Appendix 2 of this Opinion), which identify additional baseline data sources, research frameworks and guidance documents, which should be used to inform the baseline description where relevant.

### 3.22 Scheme wide: climate change

(Scoping Report Section 27)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.22.1	Table 27-3	Pre-construction preliminary studies and consultation	The Scoping Report seeks to scope this matter out on the basis that most pre-construction works are anticipated to be desk based and greenhouse gas (GHG) emissions are predicted to be very small. The Inspectorate agrees that this matter can be scoped out on that basis.
3.22.2	Table 27-3	Refurbishment during operation	The Scoping Report seeks to scope this matter out on the basis that a change of use is unlikely in the lifetime of the Proposed Development. The Inspectorate agrees that change of use would not be likely, and it is noted that maintenance, repair and replacement is separately proposed to be scoped into the assessment (in Table 27-3). On this basis the Inspectorate is content to scope this matter out.
3.22.3	Table 27-3	Operational energy and water use during operation	The Scoping Report seeks to scope this matter out on the basis that minimal energy and water will be used during the operation of the Proposed Development.  Based on the operational maintenance requirements as described in paragraphs 2.3.93 to 2.3.102 of the Scoping Report, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the assessment. The ES should include confirmation of the predicted energy and water demand during operation.
3.22.4	Table 27-3	Other operational processes during operation	On this basis that no other operational processes are required as stated in the Scoping Report, the Inspectorate agrees to scope this matter out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.22.5	Table 27-3	User utilisation of infrastructure during operation	<p>The Scoping Report seeks to scope this matter out on the basis that the Proposed Development is not expected to have any direct and quantifiable impacts on GHG emissions from electricity use that is distinct from national trends on grid decarbonisation.</p> <p>The Inspectorate agrees to scope this matter out based on the information presented in the Scoping Report.</p>
3.22.6	Paragraph 27.6.9	In-combination climate change impact (ICCI) and climate change resilience (CCR) during construction	<p>The Scoping Report proposes to scope this matter out on the basis that the short-term construction period (2027 to 2029) means significant changes to the climate are unlikely during construction. It is stated that mitigation would be in the form of best practice measures, captured in the proposed CoCP.</p> <p>An onshore construction programme of approximately up to 5 years (starting in 2026 and completing in 2030) is estimated at paragraph 2.3.57 of the Scoping Report; an offshore construction programme is not provided. The Scoping Report does not provide sufficient justification for the Inspectorate to have confidence that likely significant effects from climate change during construction can be excluded, as there is potential for extreme weather events both onshore and offshore or impacts to human receptors (eg construction workers). The ES should assess impacts from climate change, including extreme weather events over the construction periods, where significant effects are likely to occur and describe and secure any relevant mitigation measures. Decommissioning should also be considered, in line with the Inspectorate's comments at ID 2.1.13 of this Opinion.</p>

ID	Ref	Description	Inspectorate's comments
3.22.7	Paragraph 27.5.5	CCR design measures	The Scoping Report only refers the consenting scenario in which the proposed Friston substation is delivered as an extension to the substation constructed by eg EA1N or EA2 and not the consenting scenario where it could be built by the Applicant. The ES should assess both scenarios unless the optionality of the Proposed Development has narrowed to exclude options prior to submission of the DCO application.
3.22.8	Paragraph 27.5.6	CCR in other assessments	The Scoping Report states that some climate change matters, eg flooding, would be addressed in other assessments as a result of applying best practice guidance. For the avoidance of doubt, the Climate Change ES Chapter should signpost where each relevant ES aspect chapters has considered climate change, to ensure that there is no duplication or omission of assessment.



### 3.23 Scheme wide: major accidents and disasters

(Scoping Report Section 28)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.23.1	Table 28-3, paragraph 28.5.4 and Appendix 28-A	Major Accidents and Disasters	<p>The Scoping Report proposes to scope out an assessment of major accidents and/ or disasters on the basis that all potential risks will be mitigated and the Proposed Development would not be likely to lead to any increased risk of a major accident or disaster. The justification for scoping out each potential major event type is provided in Appendix 28-A.</p> <p>The Inspectorate agrees that an assessment of major accidents and disasters can be scoped out, aside from matters relating to Sizewell B nuclear power station. Any design measures taken to avoid major accidents and disasters should be clearly described within the ES and demonstrably secured in the dDCO. This should include any proposed measures to manage fire risk during operation of the proposed onshore substation, such as fire-fighting and containment measures.</p> <p>The Inspectorate notes from SCC's consultation response (Appendix 2 of this Opinion) that the Proposed Development is located within its Sizewell B emergency planning zone. The ES should include a description of any likely significant adverse effects deriving from the vulnerability of the Proposed Development to risks of major accidents and/or disasters due to its location within the emergency planning zone, and identify any protection measures that would be required to mitigation identified risks, such as construction worker emergency protection plans.</p>

### 3.24 Scheme wide: cumulative and combined effects of the project

(Scoping Report Section 29)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.24.1	Table 29-4	Cumulative transboundary effects	The Inspectorate is not able to agree to scope out transboundary effects until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.2 of this Scoping Opinion.
3.24.2	Paragraphs 29.3.7, 29.3.9 to 29.3.10 and Table 29-10	Intra-project effects between the offshore components of the Proposed Development and the TenneT offshore components during construction and operation	<p>The Scoping Report proposes to scope these matters out on the basis that the proposed TenneT offshore components would be the subject of a separate environmental assessment/ EIA compliant with Dutch legislation. It is stated that a separate document summarising the intra-project effects between the two components would be prepared once both assessments are complete.</p> <p>Paragraph 29.3.7 of the Scoping Report states that the significance of intra-project effects between the Proposed Development and the proposed TenneT development would be assessed in individual ES aspect chapters rather than the cumulative effects assessment as there is no overlap spatial or temporal overlap due to the linear nature of the Proposed Development.</p> <p>As the proposed TenneT infrastructure does not form part of the Proposed Development, the Inspectorate is unclear how the individual ES aspect chapters would assess intra-project effects. The Inspectorate advises that the separate summary document describing intra-project effects should be submitted with the ES so that any likely significant intra-project/ cumulative effects can be clearly understood and mitigation described accordingly. Consideration should be given to both linear and non-linear components of the TenneT infrastructure. The Inspectorate acknowledges that the</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
			assessment may be high level depending on availability of information about the proposed TenneT infrastructure.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.24.3	Table 29-3	Intra-project effects of the onshore and offshore components	<p>In addition to the impact pathways identified in Table 29-3, the Inspectorate notes that paragraph 8.3.62 of the Scoping Report states that there is potential for intra-project effects to otter, which would be assessed in the Cumulative and Combined Effects ES Chapter. The Inspectorate also considers that impacts to prey resource for ornithological receptors in the intertidal area should be assessed, where likely significant effects could occur.</p> <p>For the avoidance of doubt, the Inspectorate advises that the ES should include an assessment of any intra-project effects between the onshore and offshore components, for which likely significant effects occur. Effort should be made to agree the scope of the assessment with relevant consultation bodies.</p>
3.24.4	Paragraphs 29.3.12 and 29.3.21	Long and short list of developments	<p>The Scoping Report states that it is not proportionate at this stage to produce a long or short list as the boundary of the Proposed Development is proposed to be refined.</p> <p>The Inspectorate advises that effort should be made to agree the long and short list of projects for consideration in the cumulative effects assessment with relevant consultation bodies, including the host local authorities. Projects should not be discounted based only on a five year consent threshold; consideration should be given to whether a development has a longer implementation period and/ or impacts that could persist into operation resulting in potential for significant</p>

ID	Ref	Description	Inspectorate's comments
			cumulative effects. The short listing process should be evidenced in the ES.
3.24.5	N/A	Friston substation masterplan	The Applicant's attention is drawn to the comments of ESC (Appendix 2 of this Opinion) regarding the Friston substation site masterplan and co-location of projects. The ES future baseline description should include information about the masterplan. The cumulative effects assessment in the ES should consider all proposed and/ or consented projects with connection offers at the proposed Friston substation including North Falls, Five Estuaries, Sealink, Nautilus and the East Anglia offshore wind farms, as relevant to the consenting scenario(s) being assessed.

## APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

**TABLE A1: PRESCRIBED CONSULTATION BODIES<sup>1</sup>**

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The relevant Integrated Care Board	NHS Norfolk and Waveney Integrated Care Board
	NHS Suffolk and North East Essex Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Suffolk Fire and Rescue Service
The relevant police and crime commissioner	Suffolk Police and Crime Commissioner
The relevant parish council(s)	Blyford and Sotherton Parish Council
	Wangford with Henham Parish Council
	Brampton with Stoven Parish Council
	Southwold Town Council
	Westhall Parish Council
	Frostenden, Uggeshall and South Cove Parish Council
	Reydon Parish Council
	Friston Parish Council
	Knodishall Parish Council

<sup>1</sup> Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Kelsale-cum Carlton Parish Council
	Theberton and Eastbridge Parish Council
	Middleton-cum-Fordley Parish Council
	Westleton Parish Council
	Wenhaston with Mells Hamlet Parish Council
	Blythburgh with Bulcamp and Hinton Parish Council
	Walberswick Parish Council
	Benhall and Sternfield Parish Council
	Saxmundham Parish Council
	Darsham Parish Council
	Bramfield and Thorington Parish Council
The Environment Agency	Environment Agency
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Marine Management Organisation	Marine Management Organisation (MMO)
The relevant Highways Authority	Suffolk County Council
The relevant strategic highways company	National Highways
The relevant internal drainage board	East Suffolk Internal Drainage Board
Trinity House	Trinity House
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency

**TABLE A2: RELEVANT STATUTORY UNDERTAKERS<sup>2</sup>**

<b>STATUTORY UNDERTAKER</b>	<b>ORGANISATION</b>
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	East and East Midlands Forestry Commission
The Secretary of State for Defence	Ministry of Defence
The Office for Nuclear Regulation (the ONR)	The Office for Nuclear Regulation (the ONR)
The relevant Integrated Care Board	NHS Suffolk and North East Essex Integrated Care Board
	NHS Norfolk and Waveney Integrated Care Board
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Dock and Harbour authority	East Suffolk Council
Pier	Southwold Pier
Lighthouse	Trinity House
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Essex and Suffolk Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited

<sup>2</sup> 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
The relevant electricity generator with CPO Powers	East Anglia Two Limited
	East Anglia One North Limited
	East Anglia Three Limited
	Norfolk Vanguard East Limited
	Norfolk Boreas Limited



STATUTORY UNDERTAKER	ORGANISATION
	Norfolk Vanguard West Limited
	Vattenfall Wind Power Limited
	Sizewell C Ltd
The relevant electricity distributor with CPO Powers	Aidien Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Squire Energy Metering Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
UK Power Networks Limited	
The relevant Electricity Transmitters With CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

<b>STATUTORY UNDERTAKER</b>	<b>ORGANISATION</b>
The relevant Electricity Interconnectors With CPO Powers	National Grid Nautilus Ltd
	National Grid North Sea Link Limited

**TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))<sup>3</sup>**

<b>LOCAL AUTHORITY<sup>4</sup></b>
Babergh District Council
Broads Authority
Cambridgeshire County Council
East Suffolk Council
Essex County Council
Great Yarmouth Borough Council
Ipswich Borough Council
Mid Suffolk District Council
Norfolk County Council
South Norfolk District Council
Suffolk County Council

**TABLE A4: NON-PREScribed CONSULTATION BODIES**

<b>ORGANISATION</b>
Royal National Lifeboat Institution

<sup>3</sup> Sections 43 and 42(B) of the PA2008

<sup>4</sup> As defined in Section 43(3) of the PA2008

## **APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES**

<b>CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:</b>
Benhall and Sternfield Parish Council
Blyford and Sotherton Parish Council
Brampton with Stoven Parish Council
Cadent Gas Limited
Cambridgeshire County Council
Darsham Parish Council
East of England Ambulance Service NHS Trust
East Suffolk Council
East Suffolk Internal Drainage Board
Environment Agency
Essex County Council
Forestry Commission - East and East Midlands
Friston Parish Council
Frostenden, Uggheshall and South Cove Parish Council
Great Yarmouth Borough Council
Health and Safety Executive
Historic England
Joint Nature Conservation Committee
Kelsale-cum Carlton Parish Council
Maritime & Coastguard Agency
Middleton-cum-Fordley Parish Council
Ministry of Defence

<b>CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:</b>
National Gas
Natural England
Northern Gas Networks Limited
Reydon Parish Council
Royal Mail Group
Saxmundham Parish Council
Southwold Town Council
Suffolk County Council
Suffolk Fire and Rescue Service
Suffolk Police and Crime Commissioner
Trinity House
United Kingdom Health Security Agency
Walberswick Parish Council
Westhall Parish Council

# **BENHALL & STERNFIELD PARISH COUNCIL**

## National Grid LionLink Interconnector – Scoping Opinion for Environmental Statement

Benhall & Sternfield Parish Council request that the following be considered by National Grid in their Environmental Statement for LionLink.

### Village Character

The villages of Benhall and Sternfield lie immediately south of Saxmundham, and whilst, historically, were two separate villages, today operate with a joint Parish Council, whilst still retaining their individual characters.

Benhall is the larger village, and straddles the A12. The current line of the A12 was opened in 1987, and was designed to relieve Benhall, Saxmundham and Kelsale of through traffic, particularly HGVs. The original settlement was to the west of the A12, but more recently has developed to the east, and is known as Benhall Green. The housing is quite diverse, with a high percentage of social housing and very few large houses, giving a balanced community. Facilities include a primary school, community hall, and a large and much used village green, which is also used by the primary school for outdoor teaching in the summer. The principal access to Benhall Green is from the former A12, now B1121, Main Road. The most recent housing accesses directly onto Main Road, and this development is soon to be expanded by a further 40 – 50 houses.

Sternfield is the smaller village. Most of the housing is along the B1121, Church Hill and The Street, and along Sandy Lane, linking to Benhall Green. It is classified as countryside, and as such has little recent housing. Of the more scattered housing, it is worth noting that Hill Farm House (sold away from Hill Farm), is closest to the proposed converter station site. Some years ago, improvements to the B1121 through Sternfield were curtailed to avoid demolition of listed buildings, leaving the length to the east of Start Farm, The Street, more akin to a country lane. There are two significant agricultural holdings at Hill Farm and Redhouse Farm, both accessed from the B1121 at Baldry's Corner, that generate a significant amount of HGV movements. The former operates as a produce chilling and packing station for seven months a year, and the latter is mostly arable, but also has four large duck rearing sheds, as well as some farm diversification. Recent development at these holdings have shown the inability of the B1121 east of Start Farm to cope with HGVs, in terms of inability to pass other traffic, and consequential damage to the highway.

## Specific Concerns

### During Construction

Construction of LionLink, together with other energy projects in the same area, over a similar lengthy time period, means that the potential for considerable disruption to daily life must be recognised and mitigated. In particular, should LionLink consider accessing the proposed converter site from south of Saxmundham, through Benhall Green (as per one of the SeaLink options):

- Measures must be put in place to avoid construction traffic dominating local traffic, particularly at junctions.
- The significantly increased danger to vulnerable road users (pedestrians, cyclists, equestrian and mobility scooters) must be acknowledged, and mitigated through provision of safe routes, for example crossing points and segregated cyclepaths.

### During Operation

Concerns are:

- Visual intrusion into the countryside
- Light pollution during hours of darkness
- Noise, particularly at night when there is minimal background noise.

### Surface water run-off

Run-off from the proposed converter station site is via the stream that passes Redhouse Farm, through Sternfield and onwards into the River Fromus. If run-off is not appropriately managed, together with that from other converter stations on the same site, there is the potential for considerable downstream flooding. The applicant should recognise that watercourse management is largely a responsibility of riparian owners, who should not be expected to manage for anything beyond natural flow.

### Rights of Way

It is acknowledged that there are public rights of way that cross the proposed converter station site. These paths are key links, particularly that connecting Sternfield to Saxmundham. The Parish Council will support appropriate diversions, but seek to avoid multiple diversions of the same path, and encourage the applicant (together with co-developers of the site) to work together to establish new permanent routes from the outset, that can be established in landscaped swathes.

### Concluding comment

The LionLink project clearly has great potential to cause considerable disruption to the lives of many people. It is hoped that by understanding the nature of the communities affected, and their concerns, the project can be delivered with a sensitivity that minimises impact.

# **Blyford and Sotherton Joint Parish Council**

## **Response to Lionlink Environmental Impact Assessment Report**

### **1. Introduction**

#### **1.1 The Two Parishes**

Blyford and Sotherton are two rural civil parishes west of the proposed alternative landing routes set out in the Scoping Report. There are c140 electors. Amenities include a valued part 15<sup>th</sup> Century Public House and two historic churches.

#### **1.2 Statutory Consultee**

The Parish Council is a statutory consultee as both parishes are within the Underground Cable Search Area.

#### **1.3 Scoping Report**

The remit of the consultation is narrow; limited to the Environmental Impact Assessment. However, this response will argue that the whole assessment is flawed, and it is therefore legitimate to comment wider than any impact on our area.

### **2. Local Impact**

#### **2.1 Infrastructure**

The local infrastructure is inadequate. The assessment has not explained the improvements to roads and utilities that would be required across the search area. Neither are any necessary improvements costed.

#### **2.2 Economy**

2.2.1 Local businesses are very dependent on the tourism economy. Given that the proposed development will take several years the area will suffer as tourists will not want to come. The scoping report does not present any viable mitigations.

2.2.2 The search area is mostly prime agricultural land – both arable and pasture. This land will be adversely affected both during any development and afterwards when there will be inevitable degradation and loss. At a time of growing food insecurity this would be unforgiveable.

## 2.3 Biodiversity

- 2.3.1 The reeds growing in the valley of the River Blyth – within the search area - are home to valued invertebrates, plants and seasonal nesting birds. They will be affected; no mitigations are presented.
- 2.3.2 To the west, adjoining Blyford Parish, is Holton Pits. The area has been purchased by the community for the community. All the plans to increase biodiversity will be affected.

## 3. **Green Energy and a Holistic Paradigm**

- 3.1 The era of fossil fuels is coming to an end. We acknowledge that new green infrastructure is essential.
- 3.2 The Scoping Report is a consequence of the Lionlink proposal; but Lionlink has not been coordinated with other energy projects - this is an abject failure. There are some meaningless woolly statements but no joined up thinking. We present the case that there should be no further progress until there is some sensible planning.

## 4. **Conclusion**

We ask the Planning Inspectorate to take a holistic view to all east coast projects: to mitigate land-based energy developments and reject the current scoping report owing to a lack of joined-up planning.



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**From:** Tracey Burrows <[REDACTED]>  
**Sent:** 04 April 2024 14:23  
**To:** Lionlink Interconnector  
**Subject:** EN020033 - LionLink - EIA Scoping Notification and Consultation  
**Categories:** EST

You don't often get email from [REDACTED]

Dear Sirs

Please see below our response to your enquiry.

The area of major concern in our village is the land at Town Fen and we have asked the owners for their comments to be included with ours.

To make it clear we are in favour of green energy and have been actively involved in the campaign to site these cables offshore, bring them onshore in brownfield sites near London where the energy is needed. This is a common model in most European countries, is a much shorter route but more £££ per mile.

Other matters of concern are

A swathe of land will be taken that will be between 100 and 50m wide, along the whole length of the cable run, from Easton Bavents to Friston, this will prevent us from accessing part of our land as it cuts right across the middle. In some places this will be wider to accommodate 'comfort stations' and areas for storage. These are likely to be near main roads for access (A145?). Each length of cable (approx a mile) will need to be jointed and require a larger area too. The cable run will cross the A145 near the concrete pad opposite our bottom marsh, and also cross the Brampton/Uggeshall road near White House farm (Fairheads) causing ongoing disruption for Brampton residents. The cable run may be left open and unfinished for quite some time (years possibly). No trees may be planted over the actual cables (3 cables, in total approx 12-15m), meaning that we won't be able to replant willow in these areas. This is to allow for ongoing inspection of the route by drone in the future. (more intrusion)

This will obviously cause a huge amount of noise, light (there will be flood lights) and dust pollution. They have to mitigate for any 'receptors' (humans/properties) within 100m of the site.

The land at Town Fen is excessively wet.

There is no direct access to the proposed area, we've had to allow the 4 surveys so far to access down our drive and through the gated driveway area in front of the house. This is not suitable for large machinery and we have been advised not to allow this access to disrupt us. (they have no right to come into this area as it's outside the area being surveyed, but we've been accommodating so far) The old gate that we uncovered on the road is also outside their 'area of interest'

The bottom Fen/marsh (Fred's Marsh) is a haven for wildlife, and wild flowers, being next to the small wood on Uggeshall side and being bounded and crossed by waterways and having a number of large natural ponds. It's a truly unspoilt, magical place where [REDACTED] erected a summer house to enjoy the landscape. This will be inaccessible.

The land here has been extensively land drained in the past, any cabling will disrupt this (drains are every 25m), this could cause our property to flood if water passage is blocked/slowed or Uggeshall to get flash flooding if the water passage is speeded up across our land. At present it acts as a giant sponge, slowly releasing water to the tributaries of the Wang.

Yours truly

Tracey Burrows  
Parish Clerk  
Brampton with Stoven Parish Council

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**From:** Feirn, Toby <[REDACTED]>  
**Sent:** 04 April 2024 12:31  
**To:** Lionlink Interconnector  
**Subject:** Cadent - EIA Scoping Response

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Dear Sirs.

Following a review of the connector sites and the proposed cable corridor, Cadent can confirm that there a number of locations in which Gas Pipelines could be impacted by the project.

In the north there are Medium and Lower pressure gas pipelines North of Southwold. Towards the south section of the proposed route corridor there are Medium and Low Pressure assets between Saxmundham, Leiston and Aldeburgh.

These assets supply the local network to the public, any interruptions could have significant implications on Cadent. Cadent will require the necessary protective provisions to be put in place as part of the DCO process.

If there are diversions required, these may take 2 years to design and implement. If diversion are required, please make contact with Cadent as soon as possible.

Kind regards

Toby

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**From:** Alice Tithecott [REDACTED]  
**Sent:** 07 March 2024 21:17  
**To:** Lionlink Interconnector  
**Cc:** NSIPs  
**Subject:** RE: EN020033 - LionLink - EIA Scoping Notification and Consultation

You don't often get email from [REDACTED]

Dear Jack,

Many thanks for your email regarding LionLink. Cambridgeshire County Council have no comments to make at this stage.

Thanks,  
Alice

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**Alice Tithecott | Planning and Growth Manager**  
Place and Sustainability  
Cambridgeshire County Council  
New Shire Hall  
Emery Crescent  
Enterprise Campus  
Alconbury Weald  
PE28 4YE

**Upcoming leave:** [REDACTED]

Pronouns: she/her ([why have I put this here?](#))

Email: [REDACTED]

Phone: [REDACTED]

Chat with me on [REDACTED] 

*My working day may well differ from yours, so please do not feel obliged to reply outside of your normal working hours.*



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**From:** Lionlink Interconnector <[LionlinkInterconnector@planninginspectorate.gov.uk](mailto:LionlinkInterconnector@planninginspectorate.gov.uk)>  
**Sent:** Thursday, March 7, 2024 10:50 AM  
**Subject:** EN020033 - LionLink - EIA Scoping Notification and Consultation

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Dear Head of Planning,

We are contacting you at this time in relation to LionLink, which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally

important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the bottom of this page. This project is currently in the pre-application stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) (“the EIA Regulations”), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant ‘consultation bodies’ defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/ Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant’s approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant’s own consultation. Applicants have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is **04 April 2024** and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

- [Overview of the NSIP Planning Process](#)
- [Information on the stages, services and participation in NSIP planning](#)
- [FAQs relating to the Scoping process](#)
- [Information in relation to specific matters within the planning process, e.g. the role of local authorities, local impact reports, the EIA Process, Habitats Regulations Assessment \(HRA\), etc.](#)
- [Information on legislation, guidance, and National Policy Statements \(NPSs\)](#)

The relevant legal framework and regulations include:

- [The Planning Act 2008](#)
- [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations \(2017\)](#)
- [Infrastructure Planning \(Applications: Prescribed Forms and Procedure\) Regulations 2009](#)

If you have any questions regarding any of this information, please do not hesitate to get in touch by way of return to this email address.

Kind regards,

Jack Patten



**Jack Patten** (He/Him)  
EIA Advisor  
The Planning Inspectorate

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**From:** Diane [REDACTED]  
**Sent:** 20 March 2024 13:28  
**To:** Lionlink Interconnector  
**Cc:** chairdarshampc@gmail.com; Marie Backhouse; Richard Green  
**Subject:** Lion Link

You don't often get email from [REDACTED]

Good afternoon, I this am sending this response on behalf of Darsham Parish Council.

After a thorough review of the proposed Lionink project there are a few comments we wish to make.

Clearly this is a very comprehensive study using robust methodology and research data .

As the proposed Converter Site options are at Friston,Saxmundham, Leiston and Theberton,it would appear to be a much more sensible option for Lion Link to make landfall at Thorpeness as Sea Link is planning to do.This would enable the cables to all be laid along a single route and would dramatically decrease the costs and overall environmental impact on the Suffolk countryside.

Darsham will already be severely adversely affected by the Sizewell C Northern Park and Ride with significant increased volume of traffic on the A12

If the Lion Link project is permitted to go through Darsham with landfall for the underground cables at Southwold, Walberswick or Dunwich this will significantly add to the problem with increased plant equipment and heavy traffic over many years.This will affect access onto the A12 from Darsham as well as surrounding villages.

In addition with the large housing development planned on the A12 Darsham/Yoxford boundary, it seems unreasonable to add to this burden when the Substation and convertors are much farther south from Darsham.

Darsham Marshes may also be adversely affected since it is in the proposed corridor for underground cables.Whilst it isn't a RAMSAR site,it is a County Wildlife site owned and managed by Suffolk Wildlife Trust.The wildlife diverse,it has ponds,a network of dunes and wetlands supporting dragonflies, birds such as snipe,marsh and hen harriers,mammals such as otters and water voles and is used for summer grazing of cattle.

Importantly it is an accessible site well used by residents of Darsham and neighbouring villagers on foot,as well as tourists from campsites and other local hospitality venues.

In summary, it seems to be an unusual route to bring underground cables through small villages when shorter and more direct routes can be taken to the Substations.

Secondly other projects may be running simultaneously which could be integrated into the scheme thus reducing cost and the severe impact on the environment and population of the area.

We sincerely hope that this proposal can be reconsidered,to alleviate the very considerable disruption to the Suffolk countryside and environment.

Mrs D Taylor Councillor Darsham Parish Council.



**By Email Only:**

[lionlinkinterconnector@planninginspectorate.gov.uk](mailto:lionlinkinterconnector@planninginspectorate.gov.uk)

Laura Feekins - Bate  
Environmental Services  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

**East of England Ambulance Service NHS Trust**  
Hammond Road  
Bedford  
MK41 0RG

Date: 4<sup>th</sup> April 2024

Our Ref: LionLink/ZM

Dear Ms Feekins-Bate

**THE LIONLINK PROJECT**  
**PLANNING INSPECTORATE REFERENCE No. EN020033**

**Scoping Report by National Grid LionLink Limited concerning an Order granting Development Consent for LionLink, requesting the Planning Inspectorate's Scoping Opinion pursuant to The Planning Act 2008 (as amended) & the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Interested Party Response by The East of England Ambulance Service NHS Trust (EEAST)**

We write in response to the Planning Inspectorate's letter dated 7<sup>th</sup> March 2024, inviting comment from consultation bodies and interested parties as to the information considered to be included within the LionLink Environmental Statement.

EEAST is an **INTERESTED PARTY** in this planning process and notes the timeline for submitting comments by 4<sup>th</sup> April 2024.

EEAST has reviewed the Scoping Report documentation submitted by National Grid LionLink Limited (NG) and a summary of the key areas for inclusion within the Environmental Statement (ES) or in an accompanying Technical Assessment from its operational perspective are set out below:



- **Scoping Work** – is required to determine a suitable study area, baseline assessment & approach to identify the likely effects (impacts) of the Project on EEAST's operations
- **Scheme Design, Mitigation & Management Measures** - are required to avoid, reduce & mitigate for the likely Project impact on EEAST's operations during the construction phase of the development
- **Suitable DCO Requirements &/or Heads of Terms of Agreement, via a Section 106 planning obligation** – are required to secure funding & new facilities provision, as required, to increase the capacity, response capability & Project Preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate & manage the impacts arising
- **Suitable Terms of Reference, Membership & a Communications Strategy for a Transport, Community Safety, Health & Wellbeing Working Group** - are required to inform & assist the management of the construction phase of the Project, requiring a coordinated response from EEAST along with its health & blue light partners, as well as organisations such as the Royal National Lifeboat Institution

EEAST, together with its Integrated Care Board Partners (ICB), Suffolk Constabulary and Suffolk Fire & Rescue Service is therefore keen to work with NG to address these points at an early stage, and agree/ secure suitable mitigation and management measures either as a DCO Requirement and/ or a Section 106 planning obligation.

If it is deemed that the matters raised by EEAST are more appropriately addressed by a supporting Technical Assessment rather than as 'other effects' within the ES, then we would be agreeable to this.

It is noted that NG has not yet engaged with EEAST at previous non-statutory consultation stages of the Project, and early engagement with EEAST through the EIA scoping process is therefore encouraged.

## **East of England Ambulance Service NHS Trust**

EEAST is commissioned by Suffolk and North East Essex ICB (SNEE) on behalf of all ICB's to provide emergency and urgent care services throughout Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk.

EEAST transports patients to 17 acute hospitals amongst other healthcare settings, including within the East Suffolk areas covered by the likely Order Limits associated with the 'onshore' components of the LionLink Scheme.

EEAST covers an area of approximately 7,500 sq miles with a resident population of over six million people and employs approximately 4,000 staff operating from 130 sites.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) is a commissioned service providing an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

Details of EEAST's service remit, priorities, staff, vehicle fleet and estate assets, service targets, co-working relationship with other healthcare and blue light partners, along with its operational standards and thresholds, are set out for information at [Annex 1 & Annex 2](#).

## LionLink Project Proposals – Location & Overview

The LionLink Project comprises a new interconnector with a capacity of up to 1.8 gigawatts (GW) between the National Electricity Transmission Systems of Great Britain (GB) and the Netherlands, including a connection into a wind farm located in Dutch waters.

The National Grid Environmental Impact Assessment (EIA) Scoping report covers the GB components (onshore and offshore) only as follows;

### Onshore Scheme

- The Friston Substation, located south west of Leiston, Suffolk
- Proposed high voltage alternating current (HVAC) Underground Cables between the proposed Converter Station located east of Saxmundham, Suffolk & Friston

## Substation

- The proposed Converter Station east of Saxmundham – the converter station would convert electricity from Alternating Current (AC) to Direct Current (DC) & comprise buildings, plant, transformer compound, switchgear & access road(s) on a site of up to 6 ha
- Proposed high voltage direct current (HVDC) Underground Cables between the Converter Station east of Saxmundham, & a proposed Landfall Site at either Southwold or Walberswick, Suffolk
- Submarine electricity cables from a proposed Landfall Site (at either Southwold or Walberswick) at the UK coast to the edge of the UK Exclusive Economic Zone (EEZ)

## Offshore Scheme

- Routing from Landfall across the Southern North Sea to the boundary between the UK & Netherlands EEZ
- Two HVDC Submarine Cables – connecting to a Tenne T offshore platform in the Ijmuiden Ver and Nederwiek windfarm zones located in Dutch waters
- One dedicated metallic return (DMR) cable
- Up to two fibre optic cables
- Associated external cable protection (e.g. rock, berm, concrete mattresses) where the required burial into the seabed cannot be achieved

An overview of the construction phase (programme) for the Project is outlined below.

## Construction Phase

Following confirmation of any DCO for the Project, commencement of construction works is envisaged in 2026, with completion in 2030. The anticipated duration of each key part of the 'onshore project component' is outlined below;

## Onshore Scheme

- Friston Substation – 13 to 24 months depending on whether 'amendment works' to a substation provided by another electricity transmission project, or a complete 'new build' are required
- Installation of the proposed HVAC Underground Cables – up to 1 year, or up to 2 years if construction scope includes up to two additional electricity transmission projects

- Converter Station – up to 4 years from initial groundworks to erect buildings & install specialist electrical equipment through to commissioning
- HVDC Underground Cables – up to 3 years or up to 5 years if constructing an additional electricity transmission project, running in parallel with the proposed Converter Station
- Installation of the proposed Landfall – up to 20 months, potentially over two periods in different years
- Temporary Construction Compounds – these are required for the storage of plant/ machinery, stockpiled materials, site management offices, staff welfare facilities & parking;
  - Primary Temporary Construction Compounds to be in place for the duration of the cable construction
  - Secondary compounds for the majority of the construction phase, with the number & location of compounds to be determined through ongoing design
- Enabling Works – are required to construct the scheme & are likely to include;
  - Installation of bell mouths to enable access to existing/ new roads
  - Creation of access tracks – location & routing not currently known
  - Fences erected around works/ compound areas with gated access
  - Ground water & surface water controls
  - Temporary drainage works & silt fencing
  - Culvert installations (or temporary bridges) to facilitate temporary access tracks over ditches & water courses
  - Topsoil stripping & storage
- Access during installation – assessment to be carried out of the public road network to identify roads which may be suitable for HGV's, low loaders with cranes, cable delivery vehicles (AIL's) & any hazardous loads
- Temporary access & haul roads & temporary bridges across watercourses/ drains are required

### **Offshore Scheme**

- Pre-installation marine survey to be undertaken prior to cable lay & burial

- Unexploded ordnance (UXO) identification & clearance in liaison with the Marine Management Organisation
- Seabed preparation & route clearance of boulders & third-party subsea assets, such as fishnets/ wires
- Cable lay & burial utilising Cable lay vessels
- External cable protection, utilising rock berms, concrete mattresses or rock/grout bags

## Potential Impacts on EEAST Service Areas & Capacity

### Project Environmental & Social Effects

Review of the NG Scoping Report, indicates that the Project's potential effects (impacts) on EEAST's operational capacity, efficiency and resources (staff, vehicle fleet and estate assets) are not included – they are not therefore currently proposed to be baselined or assessed, and no potential mitigation parameters are outlined.

EEAST therefore request that the NG EIA scoping process (and/or an accompanying technical assessment) consider the likely Project effects (impacts) on EEAST, and we are keen to work with NG to ensure this omission is addressed by information being prepared to inform a robust DCO Application for examination.

This approach would assist the DCO process, and looking ahead, EEAST wish to agree and secure suitable mitigation and management measures as part of the DCO Requirements and/ or via a Section 106 planning obligation - and have this position reflected in a Statement of Common Ground in advance of the Examination.

EEAST's principal areas of interest and concern are summarised below.

### EEAST Principal Areas of Interest & Concern

#### Information for Inclusion Within Scope of the Environmental Statement &/or in a Technical Assessment with Related Mitigation & Management Measures

The principal areas of Project interest which are likely to significantly impact on EEAST's operational capacity, efficiency and resources requiring assessment within the ES and/or in an accompanying technical Assessment, along with appropriate mitigation and management measures are outlined below.

#### Highways, Traffic, Transport & Abnormal Indivisible Loads (AIL's)

It is evident from the EIA Scoping Report that the construction phase envisages a major level of onshore and offshore construction works, taking place as part of an extensive 4-year construction programme required to implement the LionLink project.

The onshore construction works are likely to incorporate cable corridors, trenchless crossings, haul roads and works compounds, potentially requiring road closures and route diversions - along with the potential for significant HGV (and an unspecified number of additional/ AIL led) traffic movements are envisaged.

The highways, traffic, transport and AIL effects arising and likely impact upon EEAST's operational capacity, efficiency and resources therefore need to be determined, and included within the scope of the ES, and/or within a Technical Assessment accompanying an application for a DCO.

Once this information is presented and assessed, any necessary mitigation and management measures ought to be secured and implemented through DCO Requirements, and/or through a Section 106 planning obligation as part of any DCO Approval.

## Major Accidents & Disasters

It is evident that a significant level and duration of construction phase work reliant on the use of sea-based construction vessels, heavy lift plant and specialist machinery/ equipment, producing noise, heat, vibration and dust (with work carried out during potentially adverse weather conditions) is likely to present construction site hazards and dangers both at sea and on land.

Working at sea, and on coastal, cliff edge and uneven ground, with moving machinery lifting and transporting materials, and working at depth, including the potential for trench collapse, for example, underlines the risks associated with the construction related activities – requiring both urgent and other medical interventions and transport conveyance (including specialised airborne tasking/ conveyance) to be appropriately planned for and provided.

Indeed, HSE's construction publications (for Great Britain) indicate that work related incidents involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate.

Information to determine the effect of the construction phase and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA Scoping Report, along with any potential mitigation measure parameters.

In the event of a construction phase accident, on land or at sea, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting.

The processes and procedures developed by NG, and any outsourced construction organisations, should refer to legislation and technical guidance which places a duty on NG to have its own response and medical mitigation to take the patient to a place of 'normal access' and handover to EEAST crews.

EEAST would expect any trench collapse to fall under the confined space regulations and NG, the construction company and/or contractor(s) should have access to a confined space trained team that could extricate a casualty safely.

Plans and contingencies for facilitating emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders, whilst sustaining operationally optimal attendance times (noting the likely delay factors above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) and/or Air-Sea Rescue/ RNLI access, is therefore considered to be necessary.

The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational capacity, efficiency and resources, including EEAST hazardous area response teams – HART, (which may also require co-ordination and joint tasking with the Maritime & Coastguard Agency and RNLI) needs to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation, as part of any Development Consent Order approval.

## Population Increase, Health & Wellbeing

It is evident from the EIA Scoping Report that an extensive 4-year construction programme is needed to deliver the LionLink project, and consequently, a significant number of construction workers are likely to be required to implement the large scale, wide ranging and specialised components of the scheme.

Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to directly impact on EEAST's operational capacity, efficiency and resources, including its co-ordinated response with healthcare and blue light partners, is currently absent from the EIA scope, and any related technical report scoping.

This information therefore ought to be presented and assessed, with any necessary mitigation and management measures secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation, as part of any Development Consent Order approval.

## Joint Working With EEAST, Health & Blue Light Partners

### Transport, Community Safety, Health & Wellbeing Working Group

In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety, Health and Wellbeing Working Group - is established at an early stage in the DCO preparation process, and in advance of the Examination.

This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, the SNEE ICB, Suffolk Constabulary and Suffolk Fire and

Rescue Service, with liaison maintained with any other relevant organisations such as Air-Sea Rescue/ RNLI.

## Concluding Remarks

EEAST is an **INTERESTED PARTY** in this process operating in close association with the Suffolk & North East Essex Integrated Care Board, Suffolk Constabulary and Suffolk Fire & Rescue Service across Suffolk and North East Essex within the East of England. EEAST welcomes the opportunity to respond to the LionLink EIA Scoping Report, and following review of the documentation, considers that it is currently deficient in its scope of assessment concerning the potential Project impacts on EEAST as outlined above.

EEAST considers that the Project is likely to give rise to significant effects on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which ought to be baselined and assessed in order to determine appropriate mitigation and management measures.

The Project is therefore considered to adversely affect EEAST's ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider.

Identified impacts arising from the Project should therefore be addressed by employing appropriate mitigation and management measures, to be secured and implemented through DCO Requirements, and/ or via a Section 106 planning obligation, as part of any Development Consent Order approval.

This approach ought to be reflected in a Statement of Common Ground to clarify the position reached and inform the Examination process.

The measures ought to include a process to assist EEAST and its health and blue light partners, to plan for and implement co-ordinated responses to construction phase Project impacts and incidents, to optimise patient outcomes.

We trust this is of assistance and look forward to working with NG to satisfactorily address the points raised.

Yours sincerely



Zoë May  
Head of Business Relationships

cc: Roland Arbon, Suffolk County Council  
Daniel Turner, Suffolk and North East Essex ICB



## ANNEX 1

### EEAST KEY FACTS & SERVICE INFORMATION

**This section summarises EEAST's service remit, priorities, staff, vehicle fleet and estate assets, and co-working relationship with other healthcare and blue light partners and service targets**

#### Service Remit & Priorities

The East of England Ambulance Service NHS Trust provide accident and emergency services and non-emergency patient transport services across the East of England.

The Trust Headquarters is in Melbourn, Cambridgeshire and there are Ambulance Operations Centres (AOC) at each of the three locality offices in Bedford, Chelmsford and Norwich who receive over 1 million emergency calls from across the region each year, as well as 800,000+ calls for patients booking non-emergency transport.

The 999 service is part of the wider NHS system providing integrated patient care. Provision of 999 services is aligned closely with national and regional initiatives driven by:

- Sustainability and Transformational Partnerships
- Integrated Care System
- Integrated Urgent Care systems, i.e. NHS 111, Clinical Assessment Services, Urgent Treatment Centres, GP Out of Hours Services.

Additionally, regional Ambulance Trusts may collaborate closely with other ambulance services, the wider emergency services or wider system providers to deliver appropriate patient care.

To support the service transformation agenda, the key requirements are:

- To deliver the core response and clinical outcome standards as defined by the Ambulance Response Programme
- To fulfil statutory duties relating to emergency preparedness, resilience and response (EPRR)
- Optimisation of call handling and appropriate responses through virtual alignment of NHS 111/999 and call/CAD transfer between ambulance services
- Increase the percentage of lower acuity calls managed through “hear and treat” and “see and treat” options
- Utilise a virtual delivery model to support wider workforce integration for paramedics, call handlers and specialist staff with local urgent care delivery models

- Facilitate cross boundary working and the flexible use of ambulance service resources to support the development of regional Sustainability and Transformational Plans and Integrated Care Systems.

The 999 service is free for the public to call and is available 24 hours a day, 7 days a week, 365 days a year, to respond to the population with a personalised contact service when patients:

- Require rapid transportation with life threatening illness/injury or emergencies - category 1 and 2
- Present with lower acuity urgent and less urgent conditions - category 3 and 4 requiring clinical interventions
- Patients may be passed to 999 via other NHS health care systems, including NHS 111
- EEAST receives over 1 million emergency (999) calls per year and 800,000 calls for patients booking non-emergency transport.

EEAST also provides urgent and emergency responses to Healthcare Professionals requiring ambulance assistance, and inter-facility transfers between hospitals and other healthcare settings, where patients require treatment at alternative sites to their current setting.

Non-Emergency Patient Transport Services (NEPTS) provide an essential lifeline for people unable to use public or other transport due to their medical condition. These much-needed journeys support patients who are:

- Attending hospital outpatient clinics or other healthcare location
- Being admitted to or discharged from hospital wards
- Needing life-saving treatments such as radiotherapy, chemotherapy, renal dialysis or DVT treatment.

### Service Assets

EEAST clinicians:

- Emergency Care Support Workers
- Emergency Medical Technicians
- Paramedics
- Specialist Paramedics
- Critical Care Paramedics.

Types and models of response:

- Community First Responder (CFR)
- Patient Transport Service (PTS)
- Clinical See and Treat
- Clinical Hear and Treat (telephone triage)

- Early Intervention Team (EIT)
- Rapid Response Vehicle (RRV)
- Double Staff Ambulance (DSA)
- Hazardous Area Response Team (HART)
- Specialist Operations Response Team (SORT)
- Helicopter Emergency Medical Service (HEMS), EEAST utilise 5 aircraft across 3 charities within the region
  - Magpas – 1 x aircraft from RAF Wyton
  - East Anglian Air Ambulance – 2 x aircraft form Cambridge and Norwich Airport
  - Essex and Herts Air Ambulance – 2 x aircraft form North Weald and Earls Colne

Ambulance Operations Centre (AOC) staff:

- 999 Call Handlers
- Emergency Medical Dispatchers
- Tactical Operations Staff.

EEAST support services staff cover all other corporate and administrative functions across the region.

### Estates

The Trust is rolling out a Hub and Spoke network with up to 18 hubs to provide regional premises for delivery of operational responses to calls, flow of ambulance preparation via the Make Ready function (cleaning and restocking of ambulances) and despatch of ambulances to local spokes (reporting posts/response posts/standby locations). Support services such as workshop facilities, clinical engineering (medical equipment store and workshop), consumable product stores and support office accommodation are also provided from Hubs.

- Ambulance Station Central Reporting Post - A 24/7 - Permanent reporting base for staff and primary response location for one or more vehicles. Provision of staff facilities.
- Ambulance Station Response Post - A primary response location, which includes staff facilities but is not a reporting base for staff.
- Standby Location - Strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided on an informal basis only by agreement with the relevant landowner.

Ambulance Stations in the LionLink Suffolk Onshore Project area are:

Saxmundham
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Ambulance Stations in the LionLink Onshore Project surrounding area which may support are:

Martlesham Heath	Ipswich
Beccles	Diss

## Vehicle Fleet

- 387 front line ambulances
- 178 rapid response vehicles
- 175 non-emergency ambulances (PTS and HCRTs vehicles)
- 46 HART/major incident/resilience vehicles located at 2 x Hazardous Area Response Team (HART) bases with a number of specialist vehicle resources.

## Workforce & Equipment

Approximately 4,000 staff and 800+ volunteers across 120 sites. Each resource has equipment specific to the operational function of the vehicle and skill level of the staff.

## Specialisms

EEAST works collaboratively across our blue light partners and have joint working groups with Police and Fire Services across the region, working in partnership managing responses to incidents and undertaking joint exercises with our dedicated resources to prepare for specialist rescue, major incidents and mass casualty incidents.

EEAST is a Category 1 Responder under the Civil Contingencies Act, 2004, playing a key role in developing multi-agency plans against the county and national risk registers. EEAST also works closely with the Military, US Air Force, Royal Protection Service, Stansted Airport and the Port of Felixstowe Police, Fire and Ambulance services.

EEAST's Emergency Preparedness Resilience Response (EPRR) team lead on the Joint Emergency Services Interoperability Principles (JESIP) working in close partnership with all blue light agencies, the Coastguard and Local Authorities. Specialist resources work with the Police in counter terrorism and developing response plans in the event of a major incident.

EEAST are an integral part of the locality's resilience response sitting on a number of safety advisory groups, east coast flood working groups and hospital emergency planning groups.

## Co-working Relationship with other Blue-Light and Healthcare Partners

EEAST is an integral part of the wider healthcare system working closely with the North Essex Integrated Care System (ICS) and Clinical Commissioning Groups (CCGs) to deliver emergency and urgent care and are key stakeholders in supporting wider healthcare initiatives.

Within North Essex, EEAST work with the CCGs in delivering additional care pathways focussing on hospital admission avoidance, this is a partnership with the local acute

providers and local authorities. EEAST operate Early Intervention Response vehicles and a Rapid Intervention Vehicle. These resources work collaboratively within the system to offer holistic care to patients whilst reducing pressure on Emergency Departments.

This is EEAST's response to the requirements of the **NHS Long Term Plan**, with the clear narrative that in order to bring the NHS into financial balance all NHS providers must find mechanisms to treat patients in the community and out of the most expensive care setting, which are acute hospitals. This not only saves the NHS critical funding, but it also improves patient outcomes.

EPRR and Specialist Operations teams routinely train with other blue light agencies in preparedness for major incidents such as terrorist attacks and major incidents with statutory training obligations to respond to local and national incidents.

In continuing to respond to the COVID-19 Pandemic, EEAST is working collaboratively with Private Ambulance providers, the Military, volunteer Ambulance Services (such as St John Ambulance and British Red Cross) and local Fire and Rescue Services, to increase its capacity and maintain service delivery to meet the additional demand.

### **EEAST Service Targets**

All NHS organisations are required to report against a set of Core Quality Indicators (CQIs) relevant to their type of organisation. For ambulance trusts, both performance and clinical indicators are set as well as indicators relating to patient safety and experience.

NHS organisations are also required to demonstrate their performance against these indicators to both their commissioners and Regulators (NHS England/Improvement).

It is important to note that EEAST is also measured on how quickly a patient is transported to an appropriate location for definitive care, often in time critical circumstances.

Failure to deliver against these indicators will result in a Contract Performance Notice and could result in payment being withheld, as prescribed in NHS Standard Contract 20/21 General Conditions (Full Length) GC9 9.15.

## ANNEX 2

### NHS Standard Contract National Quality Requirement Ambulance Service Response Times

National Quality Requirement	Threshold
Category 1 (life-threatening) incidents – proportion of incidents resulting in a response arriving within 15 minutes	Operating standard that 90th centile is no greater than 15 minutes
Category 1 (life-threatening) incidents – mean time taken for a response to arrive	Mean is no greater than 7 minutes
Category 2 (emergency) incidents – proportion of incidents resulting in an appropriate response arriving within 40 minutes	Operating standard that 90th centile is no greater than 40 minutes
Category 2 (emergency) incidents – mean time taken for an appropriate response to arrive	Mean is no greater than 30 minutes
Category 3 (urgent) incidents – proportion of incidents resulting in an appropriate response arriving within 120 minutes	Operating standard that 90 <sup>th</sup> centile is no greater than 120 minutes
Category 4 (less non-urgent “assess, treat, transport” incidents only) – proportion of incidents resulting in an appropriate response arriving within 180 minutes	Operating standard that 90 <sup>th</sup> centile is no greater than 180 minutes

For above Indicators:

<b>Method of Measurement:</b>	See AQI System Indicator Specification at:  <a href="https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/">https://www.england.nhs.uk/statistics/statistical-work-areas/ambulance-quality-indicators/</a>  Review of Service Quality Performance Reports
<b>Period over which the Standard is to be achieved</b>	Quarterly for all indicators

National Quality Requirement E.B.S. 8	Threshold
Following handover between ambulance and A+E, ambulance crew should be ready to accept new calls within 15 minutes and no longer than 30 minutes	>0

For above Indicator:

<b>Method of Measurement:</b>	See Contract Technical Guidance Appendix 2 at <a href="https://www.england.nhs/nhs-standard-contract">https://www.england.nhs/nhs-standard-contract</a>
<b>Period over which the Standard is to be achieved</b>	Ongoing



FAO Laura Feekins-Bate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Your ref:** EN020033  
**Our ref:** Lion Link EIA Scoping Response April 2024  
**Date:** 4 April 2024  
**Please ask for:** Grahame Stuteley  
**Customer Services:** 03330 162 000  
**Email:** [REDACTED]

By email: [lionlinkinterconnector@planninginspectorate.gov.uk](mailto:lionlinkinterconnector@planninginspectorate.gov.uk)

Dear Laura Feekins-Bate (Senior EIA Advisor on behalf of the Secretary of State)

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.**

**Application by National Grid LionLink Limited (the Applicant) for an Order granting Development Consent for LionLink (the Proposed Development).**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

East Suffolk Council (ESC) welcomes the opportunity to comment on the Lion Link EIA Scoping Report dated March 2024. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008. The Council's detailed comments in relation to the Scoping Report can be found in Appendix 1 of this letter.

ESC would like to highlight that the Lion Link project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed<sup>1</sup>, within the district. It is therefore essential that the project is not considered in isolation, and the full cumulative effects of Lion Link with other projects and proposals is adequately and appropriately assessed, mitigated and where appropriate compensated. In addition to the NSIPs that are consented/proposed in the East Suffolk area, there are also several projects consented and proposed in the wider Suffolk and East Anglia region which also need to be considered in terms of the wider reaching impacts.

Since 2018, the Council has been engaging with the Government regarding the unstructured, non-collaborative approach to energy development. The Council would like to be supportive of well-developed coordinated projects, that enable the goal of Net Zero and the interim targets. This however cannot be at

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<sup>1</sup> Consented: Sizewell C New Nuclear Power Station, East Anglia One North, East Anglia Two and East Anglia Three Offshore Wind Farms.

Proposed: Lion Link and Nautilus Multi-purpose Interconnectors, Sea Link Subsea Link, North Falls Offshore Windfarm, Five Estuaries Offshore Wind Farm.

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LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

the expense of Suffolk's environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation.

We have reviewed the EIA Scoping Report and associated consultation materials together with the Supplementary Non-Statutory Consultation Summary Report (March 2024) which was published alongside the Scoping Report.

ESC was disappointed to learn of the early dismissal of exploring more extensive offshore options for connecting the project, as opposed to the need case being presented for a connection at Friston. We note that the Lion Link response in the Consultation Summary Report states that *'Lion Link is an offshore alternative to generating energy that would otherwise have to be produced onshore.... a fully offshore grid (or energy island) does not (and could not) form part of the project that is being consulted upon. LionLink must operate within existing legislation and regulations, and an offshore grid would require changes to these'*.

ESC remains disappointed that there is no clear justification provided as to why an offshore connection option is not being explored further. ESC considers this should be fully explored, minimising the need for onshore infrastructure within our district.

The Consultation Summary Report states *'We can clarify that even with the provision of offshore converter stations and substation(s), onshore infrastructure would still be needed to connect to the onshore national electricity network. For instance, cables will still need to run onshore from an offshore grid; onshore converter stations would still be needed to convert the electricity (HVDC to HVAC) and; a substation to transform electricity into the required voltages. We are listening to community feedback and understand the concerns about the impact of LionLink on the natural environment. Minimising the environmental impact onshore and offshore is front of mind as we develop our proposals'*. This is extremely disappointing.

ESC recently wrote to the Rt Hon Claire Coutinho MP (Secretary of State for Department of Energy Security and Net Zero) to request a full cost-benefit analysis of the options for connecting all the currently proposed and consented offshore wind, Multi-purpose Interconnectors (MPIs) and reinforcement projects to users in the UK, with prioritisation given to the offshore solutions connecting power directly to areas where the demand is needed and the utilisation of brownfield sites.

ESC has previously requested National Grid comprehensively and robustly explore every opportunity for coordination of the Lion Link project with other proposed and consented projects at all stages of the development consent process. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented.

ESC continues to have significant concerns regarding the Lion Link project for the reasons set out in this letter and we will seek to press the Secretary of State and PINS to timetable together the Examinations on connected NSIP proposals to ensure these matters can be fully explored by the respective Examining



Authorities, allowing the communities to participate in a structured way. We therefore maintain our objection to this project based on the current proposals. The Lion Link project fails to deliver coordination with British offshore wind energy providers (or any other British energy project), missing vital opportunities to reduce the amount of onshore connection infrastructure required across projects within our region. National Grid Ventures (NGV) will be required to demonstrate the geographical need case for a connection at Friston in light of the current uncertainties discussed. ESC maintains the view that an alternative connection elsewhere would enable the potential use of the multi-purpose element of the interconnector to facilitate connection to offshore wind projects.

Should the Applicant progress the Lion Link project within East Suffolk, onshore coordination opportunities must be maximised with other projects (i.e. the Nautilus project (should this project connect within East Suffolk) and National Grid Electricity Transmission's (NGETs) Sea Link project). This will be a minimum expectation of ESC and the local communities we represent. ESC would urge NGV to focus on siting and routeing options which can facilitate this level of coordination. We remain disappointed at the lack of demonstratable coordination between projects and maintain our strong objection to the current proposals. Projects seeking to utilise connection offers in this region must be considered collectively to fully understand their impacts.

However, ESC is aware that the Government regulator for 'The Office of Gas and Electricity Markets' (Ofgem) published a press release on 1 March 2024<sup>2</sup> advising that the Lion Link project has been recommended for approval, whilst *'Ofgem is currently not minded to recommend regulatory support for another proposed OHA interconnector, Nautilus, as thus far it has not been judged to have sufficiently demonstrated its consumer value'*. The press release also states that the regulator has launched a consultation on its minded to position to fund the Lion Link project, but ESC notes this does not include the projects which have *'not thus far sufficiently convinced Ofgem that they meet the requirements for approval'* such as Nautilus. This news adds greater uncertainty for the proposed Nautilus project demonstrating a greater justification for the Lion Link project to make use of the alternative connection being explored by Nautilus at the Isle of Grain, rather than at Friston.

Whilst ESC welcomes the work the developer has undertaken to date in conjunction with NGET regarding the Sea Link project to consider opportunities for coordination, this work needs to continue and extend beyond the consideration of co-location to ensure that genuine coordination at all stages of the process is secured. The landfalls identified within the consultation remain of significant concern and will result in undesirable adverse environmental, economic, and social impacts. East Suffolk is a highly designated landscape with high ecological sensitivity to proposed development, noting that coastal tourism is an important aspect within our local economy.

ESC is disappointed to learn that the proposed landfall options for Lion Link requiring the shortest onshore cable route have both been discounted (i.e. Landfall E Aldeburgh and Landfall H Dunwich). Justification is provided for this stating that the Aldeburgh landfall was discounted primarily due to significant environmental and technical risks associated with the nearshore approach to the site, crossing up to 11 other

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<sup>2</sup> <https://www.ofgem.gov.uk/publications/ofgem-gives-provisional-green-light-projects-power-millions-homes>

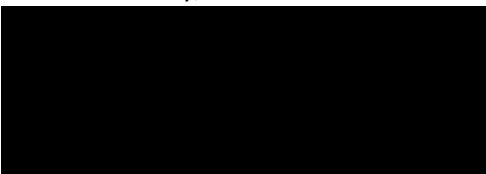
cable routes within the Outer Thames Estuary Special Protection Area (SPA). Given that the crossing of other subsea cables making landfall in the locality has been cited as a constraint factored into the emerging preferences for landfall, ESC highlights that insufficient information is provided regarding what the cables routes are for and whether these are constructed, consented, or proposed cable routes.

Whilst the report also states that there were onshore designations in the area creating additional challenges for the project at Aldeburgh, it is clear that the local communities within East Suffolk will have to endure a greater level of local disruption from the emerging preference of a longer onshore cable route via either Southwold or Walberswick. The Lion Link project has therefore missed an important opportunity to further reduce the level of onshore impact within East Suffolk, placing offshore considerations over that of local communities. The project also fails to maximise opportunities for co-ordination with the proposed NGET Sea Link project at its proposed Aldeburgh landfall site and cable corridor to the proposed co-located Saxmundham converter station site. ESC does not agree that enough has been done to fully explore this possibility prior to the notion being dismissed by the project.

ESC also maintains that insufficient information has been provided within the consultation to give the Council confidence that the siting and routeing options presented are viable. There are significant challenges in relation to securing an appropriate landfall, cable route and converter station site for the project and managing and mitigating the impacts at the connection site. ESC considers that further work is necessary to demonstrate the viability of the siting and routeing options proposed prior to NGV selecting and progressing associated works on preferred options.

If you have any questions regarding the detailed comments provided in Appendix 1, please do not hesitate to contact me.

Yours faithfully,



**Philip Ridley BSc (Hons) MRTPI**  
Head of Nationally Significant Infrastructure Planning  
East Suffolk Council

## **Appendix 1 – ESC’s Detailed Comments on the Lion Link Scoping Report**

### **Scoping Report – Main Text - Introduction**

#### **Chapter 1. Introduction 1-1**

##### 1.1 Overview of the Project

Paragraph 1.1.5 states *‘The GB portion of the Project comprises the following key components:... Submarine electricity cables from a proposed Landfall Site (at either Southwold or Walberswick) at the mean high-water mark at the UK coast to the edge of the UK Exclusive Economic Zone (EEZ)’*.

ESC’s Coastal Management concern relates to the proposed landfall at Mean High Water Mark (MHWM) being mentioned, this could cause confusion and should be reworded. Will this mark be the present level, or the MHWM at end of cable lifetime (+4 – 60 years). Will anything be exposed at MHWM? It is assumed the cable would be buried using HDD techniques. Paragraph 2.3.89 mentions the exit point is 1km from coastline – so why is MHWM mentioned here? Further clarification is required in relation to this matter.

##### 1.4 The need for the Project 1-2

Paragraph 1.4.3 states that *‘The objective of the Project is to connect the British and Dutch NTS and Dutch offshore wind generation by 2030, for the purpose of achieving the energy security and supply benefits that come with a project of this scale and contributing to the UK Government’s target to realise at least 18GW of interconnector capacity by 2030’*.

It is understood that there are many uncertainties associated with international connection projects, being reliant on two Governments working together whilst balancing their own domestic and political interests. The proposed onshore connection at Friston adds further uncertainties for this project, noting the potential additional generation, interconnectors, and energy storage which could be expected to connect in the East of England Region by 2035, established by the National Grid Electricity System Operator (NGESO) in the Future Energy Scenarios. Projects seeking to utilise connection offers in this region must be considered collectively to fully understand their impacts. The benefits of this project for the East Suffolk District remain unclear given that this project seeks to import and export power to be transmitted elsewhere, whilst the impacts associated with the onshore infrastructure remain in situ affecting the local communities within our district, being set to host this development for years to come.

There is no clear justification provided as to why an offshore connection option is not being explored further in the consultation materials. ESC considers this should be fully explored, minimising the need for onshore infrastructure. Should this not be viable, NGV will be expected to provide clear justification why an offshore connection option has not been taken forwards. ESC recently wrote to the Rt Hon Claire Coutinho to request a full cost-benefit analysis of the options for connecting all the currently proposed and consented offshore wind, Multi-purpose Interconnectors (MPIs) and reinforcements projects to users in the UK, with prioritisation given to the offshore solutions connecting power directly to areas where the demand is needed and the utilisation of brownfield sites.

ESC previously welcomed the identification of this project as an MPI as part of the Offshore Transmission Network Review (OTNR). However, we also raised significant concerns (which remain current concerns) that there are no firm proposals in place to connect the MPI project to any other UK energy projects, unlike the Dutch offshore wind connections being proposed. It is apparent that Lion Link still effectively remains a point-to-point interconnector rather than a MPI in terms of British energy. The rebranding of the project from Euro Link to Lion Link suggests more of a UK focus, yet only European offshore wind has been included in the project.

Whilst MPIs were considered as one of the coordinated solutions within the OTNR, ESC remains disappointed that coordinated outputs within our region resulting from the OTNR and its 'Early Opportunities' workstream relate to Sea Link, North Falls and Five Estuaries rather than with Lion Link. We welcome that NGV, alongside other developers, signed a joint statement committing to exploring coordinated designs in East Anglia, with Lion Link also being accepted by Ofgem as a MPI pilot project, however, we were disappointed that Lion Link was not also nominated as a pathfinder project at that time.

The Lion Link MPI is therefore unlikely to include any offshore coordination at the British end, resulting in missed opportunities for associated coordinated reductions in the extent of the onshore infrastructure. As stressed in our previous consultation response, we find this unacceptable given that NGV has a connection offer in the Leiston area. East Suffolk has significant constraints along the coastline with high environmental sensitivity and designation. Given the anticipated generation predicted to require connection in the area in the future in our region, the lack of offshore wind coordination remains unacceptable. The current absence of any firm commitment to connect the project with British offshore wind in this region highlights that the proposed connection offer in Leiston has been poorly planned, making a connection for an MPI in this area geographically unsuitable, with better opportunities to connect the project up with British offshore wind at other locations.

In addition to the absence of coordination with British offshore wind, it is known that NGV are promoting a separate Nautilus MPI and NGET are promoting the Sea Link project, which all have the same proposed connection location. As requested in our previous consultation response, ESC continues to request that should all the projects proceed, NGV and NGET should work together to ensure maximum coordination between the projects is achieved onshore, minimising disruption and environmental impacts introduced through the construction of onshore infrastructure. ESC is also aware that there are additional connection offers listed on the National Grid TEC register at Friston, therefore NGV will be expected to work with these promoters as well in order to maximise coordination efforts in minimising the amount of onshore infrastructure required within East Suffolk.

The Overarching National Policy Statement for Energy (EN-1) states that the preference should be for coordination and seeks to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. This must therefore be fully explored, with robust justification being demonstrated should this not be viable across the proposed projects. ESC cannot at present see clear evidence of a coordinated approach being taken which raises significant concerns. We understand that the outputs from the Government piloting Offshore Coordination Support Scheme (OCSS)

were announced on 5 December 2023, and whilst the scheme was designed to encourage advanced offshore energy projects to develop coordinated options for offshore transmission whilst learning lessons to inform future projects, ESC notes that only North Falls and Five Estuaries offshore wind farms together with the Sea Link project were successful in receiving grant funding. Sea Link is expected to connect with Lion Link's proposed Friston substation and it is understood that converter stations will be co-located at Saxmundham for the projects. We will therefore continue to push both interconnector projects to co-ordinate at every opportunity.

#### 1.5 The need for an Environmental Impact Assessment 1-3

ESC agrees and supports NGV's commitment to undertake an Environment Impact Assessment.

#### 1.8 Structure of this EIA Scoping Report

Table 1-2 'Structure of the EIA Scoping Report' states that it *'Describes aspects to be scoped in and scoped out of the EIA. For those scoped in proposed methodology and approach to the assessment is included. These chapters also include an explanation of likely significant effects associated with each topic, in accordance with Regulation 10 (3) of the EIA Regulations'*.

ESC's Coastal Management concern relates to there being no Coastal Geomorphology chapter listed in either the 'Onshore' or 'Offshore' scheme, suggesting the project lacks EIA on coastal processes and receptors. It is noted that the Onshore scheme boundary goes down to Mean Low Water Springs (MLWS) and the Offshore boundary goes up to Mean High Water Springs (MHWS), and the intertidal range will be covered by both schemes – however there is no chapter designated to the EIA for cable landfall sites on the coast. ESC would welcome a separate chapter/topic in the EIA on 'Coastal Geomorphology'.

#### 1.11 Stakeholder engagement 1-11

##### Engagement and consultation with technical and specialist stakeholders 1-13

Paragraph 1.11.9 states that *'The Applicant will continue to engage with other developers in the area to consider opportunities for coordination, including Sea Link, Nautilus, Scottish Power Renewables and EDF Energy'*. ESC welcomes this approach noting the efforts made by NGV to consider the concept of co-location of converter stations, shared cable corridors, and consolidation of landfalls. ESC comments stated above similarly apply to the work undertaken; the site options considered for co-location are based on the assumption that the Nautilus and Eurolink projects are connecting to the grid at the proposed Friston substation. However, with regards to the SPR projects, at the time of writing the outcome of the legal challenges is not yet known and this will need to be revisited and potentially re-assessed, dependent on the decision from the courts. ESC would like to emphasise that we requested all opportunities for coordination be explored during all phases of the development, both pre and post consent. This will extend beyond just co-location opportunities, although this is a fundamental consideration.

ESC strongly welcomes project coordination, however, remains disappointed that this has not been taken forwards for the proposed cable landfall site (with Sea Link progressing Aldeburgh), therefore the opportunity

to avoid additional disruption to coastal processes and amenity has been missed. ESC notes that co-ordination is dismissed in paragraph 2.3.47 which states that *'Sea Link's preferred landfall site is further south than those preferred for this Project. As a result, there is no opportunity to co-ordinate or co-locate at the landfall'*. ESC expects to see a robust justification from NGV regarding the lack of coordination.

## Chapter 2. The proposed Scheme Description 2-1

### 2.2 Proposed Scheme overview 2-2

#### Proposed Scheme overview

Paragraph 2.2.2 states that the proposed scheme will utilize *'Proposed high voltage alternating current (HVAC) Underground Cables between the proposed Converter Station in Suffolk and Friston substation; Proposed high voltage direct current (HVDC) Underground Cables between the proposed Converter Station in Suffolk, and a proposed Landfall Site at either Southwold or Walberswick'*. ESC fully supports the undergrounding of the HVAC and HVDC cabling removing the need for unsightly overhead transmission infrastructure.

### 2.3 Proposed Onshore Scheme 2-2

#### Friston Substation

Paragraph 2.3.4 states that *'There are various scenarios for how development of Friston Substation would be brought forward. This EIA Scoping Report presents two sets of parameters for Friston Substation: Amendments to Friston Substation – amendments to Friston Substation would be required if Friston Substation was built out by either EA1N/EA2 or Sea Link....; Proposed Friston Substation – if the Project was brought forward first, then it would be responsible for consenting Friston Substation for the Project, EA1N/EA2, Sea Link and Nautilus'*.

Paragraph 2.3.5 states *'The current assumption is that EA1N/EA2 would construct Friston Substation and the proposed Onshore Scheme would amend Friston Substation. However, as there is a scenario where the proposed Onshore Scheme could come forward first, the EIA will consider both scenarios within the assessments in order to ensure the EIA is robust in considering the worst-case scenario as well as the current assumption'*.

ESC recognises that NGV has a connection offer from NGESO in the Leiston area, and that it is proposed that the connection location will comprise the proposed Friston substation consented under the East Anglia One North (EA1N) and East Anglia Two (EA2) DCOs. However, the Lion Link connection agreement specifies the Leiston area rather than specifically identifying the proposed Friston site. The DCOs for the Scottish Power Renewables (SPR) projects (EA1N and EA2) identified Friston as the approved site for a National Grid substation and two substations for connecting the offshore wind farms. This was not approved on the basis of comprising a strategic connection hub providing future connections for projects including Lion Link.

The SPR projects have also been delayed due to the current legal challenges, and they also did not receive Contract for Difference (CfD) funding in the recent Round 5 Government allocation bringing project certainty and timeliness into question. It is understood that SPR are waiting for CfD before a fixed commencement date is set for the projects. Therefore, the planning and financial environment has changed introducing greater uncertainty for the projects. It is therefore wrong to assume that a connection in the Leiston area should automatically mean a connection at Friston. The NGV Lion Link project team must therefore fully justify why the siting and routing options for the MPI project is focussed on this connection site over other possible locations in the Leiston area, as denoted by the connection offer. Should the SPR projects not go ahead for whatever reason, ESC is unlikely to support the need case for a strategic National Grid substation providing a connection hub being located at Friston solely for the purpose of future connections at that site.

ESC is not aware of any specific geographical reason why the Lion Link MPI needs to connect in this area. In fact, NGV has announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary. If there is indeed no geographical reason why Lion Link needs to connect in this area (noting the project does not propose connections with British offshore wind in this region), ESC would welcome NGV similarly exploring alternative connection opportunities for this project which could provide greater opportunities for coordination.

NGV has identified possible converter station sites within a 5km radius of the proposed Friston substation based upon its experience and industry standard requirements, adding that the most efficient technical solution is to locate the converter station as close to the proposed Friston substation as possible for a variety of technical reasons, including minimising disruption and land take required for cable burial. The siting and routing options are predicated on the SPR consents and should there be any change to the status of the consents in the future, NGV will need to review the principles underpinning the site selection process for the Lion Link project. ESC continues to have significant concerns about the current proposals for this project and does not accept the current siting justification provided by NGV for the proposed onshore infrastructure, or the need case for the additional connection at SPR's Friston site (with or without the SPR projects) for the reasons stated.

#### Amendments to Friston Substation

Paragraph 2.3.6 also confirms that *'If Friston Substation is delivered by SPR, in accordance with the EA1N/EA2 consents, or by Sea Link, amendments to Friston Substation would be required in order to accommodate the connection of the proposed Onshore Scheme'*. ESC notes this would include *'Extension to the boundary of the site and installation of new boundary fencing and landscaping; Extension of the Gas Insulated Switchgear (GIS) Hall, including associated civil ground works and other mitigation such as drainage; Installation of up to two new GIS bays for the connection of the proposed HVAC Underground Cables, located within the extension of the GIS Hall building; Associated GIS equipment and busbars for the additional Series Reactor circuit bays and operational bays, such as Bus Sections, to be located within the extension of the GIS Hall; and Connection of a new 400kV Series Reactor static wound unit, located within the extended operational boundary of the substation'*. Therefore, assuming the Friston substation is constructed by SPR under the DCO approvals for EA1N and EA2, it is clear from *'Table 2-1 Key characteristics of the amended Friston Substation'* that

additional onshore infrastructure is needed to connect Lion Link at Friston including an additional 5m tall building to accommodate the connection, up to 1ha of land, and the relocation of the permanent access road. ESC does not support this requirement at Friston due to the need case concerns raised earlier in this response.

It is also understood that the SPR EA1N and EA2 projects gained consent for both an Air-insulated substation (AIS) and GIS substation, noting that SPR has not confirmed publicly they will be providing a GIS substation at Friston at the time of this response being written. ESC is concerned at the lack of transparency regarding this amongst developers, it is essential that a mechanism is in place to ensure that the proposed Friston substation is sized appropriately for the committed connections set out in this EIA Screening.

It is also alarming to ESC to read in paragraph 2.3.8 that *'if Friston Substation is not delivered by SPR pursuant to the EA1N/EA2 consents, or by the Sea Link or Nautilus Projects, Friston Substation would be delivered by the Applicant as part of the proposed Onshore Scheme'*, with paragraph 2.3.9 adding *'In this scenario, the Project would seek consent for Friston Substation to allow connections for the proposed Onshore Scheme, as well as for EA1N/EA2, Sea Link and Nautilus'*. This confirms that a connection 'hub' will be pursued at the Friston site either with or without the SPR projects. ESC and the local communities it represents do not support such a large scale urban development at this rural location and will continue to oppose it based on the weak need case presented. If it was the intention for the proposed Friston substation to become a strategic connection hub, this should have been made clear at the time of consenting for EA1N and EA2. The lack of transparency on this matter has caused a significant degree of mistrust in the community.

#### Proposed Friston Substation

It is noted in paragraph 2.3.8 that *'if Friston Substation is not delivered by SPR pursuant to the EA1N/EA2 consents, or by the Sea Link or Nautilus Projects, Friston Substation would be delivered by the Applicant as part of the proposed Onshore Scheme'*. Additionally, paragraph 2.3.9 states that in this scenario, *'the Project would seek consent for Friston Substation to allow connections for the proposed Onshore Scheme, as well as for EA1N/EA2, Sea Link and Nautilus'* comprising of a *'new GIS Substation to connect to the existing 400kV overhead lines (Bramford to Sizewell circuits 1 and 4) including associated civil ground works such as drainage'*.

Whilst ESC does not support the current need case presented for additional subsea cable connections at Friston for the Lion Link, Sea Link or Nautilus projects, the commitment by NGV to use GIS technology is supported under such a scenario as this would reduce the footprint of the required infrastructure at the site (when compared to the use of an AIS substation design). However, NGV will be expected to also set out a scenario where the additional projects looking to connect at Friston set out within the EIA Scoping do not come forward, a firm guarantee should be in place which demonstrates that the substation will be sized appropriately only for the committed connections.

#### Proposed HVAC Underground Cables



It is noted from Table 2-3 'key characteristics of the proposed HVAC Underground Cables if constructing for the proposed Onshore Scheme only' that the cable corridor for the project alone HVAC cabling requires a permanent easement of up to 30m, this fits with ESC's expectations in line with the East Anglia One North and East Anglia Two projects' proposed corridors widths. However, the table caveats this noting that *'This does not include land that may be determined to be required for potential mitigation following the assessment'*. ESC would still expect the overall project alone easement requirements to match those of other similar projects such as those stated. Should a greater than 30m easement be required for the project alone scenario, ESC would seek robust justification.

ESC notes in Table 2-4 'key characteristics of the proposed HVAC Underground Cables if providing the ducting for up to two other projects' that the proposed permanent easement increases to 'up to 60m'. Whilst this is considerably more than the project alone scenario, coordination efforts are supported in order to minimise the extent of onshore infrastructure required (and the associated disruption to local communities).

#### Proposed Converter Station

Table 2-5 'key characteristics of the proposed Converter Station' states that the permanent footprint will be 260m x 260m within a permanent land take of 'up to 6ha', caveating this by stating that *'this does not include land that may be determined to be required for potential mitigation following the assessment'*. It also states the maximum building height will be 26m above ground level. ESC requires comprehensive and detailed justification supporting the need for such parameters, demonstrating that the final design is the smallest it could be whilst still fulfilling its required function.

#### Proposed HVDC Underground Cables

Paragraph 2.3.43 states *'Where the Project is installing the HVDC Underground Cables for this Project and the ducting for up to one other project (Nautilus), the proposed Onshore Scheme would include an additional trench (two trenches in total) and additional four ducts (eight ducts in total) alongside associated temporary stockpiles of topsoil and subsoil. As a result, the working width would increase. The additional trench would be constructed and reinstated ready with empty ducts and works to install the cables within these ducts would be subject to separate project consents obtained by the project'*.

This confirms two matters for ESC, the first being that any co-ordination would only be with one other project, and the second being that this would be with Nautilus. However, ESC understands that the Nautilus project is in the very early pre-application stages and no preferred landfall yet known. For HVDC co-ordination to work for both projects, Lion Link would need to pre-empt the preferred landfall location for Nautilus as well as know that the project was connecting in East Suffolk, both of which is not possible prior to the project going through the formal consultation channels pre-DCO. ESC understands that the Nautilus project is currently exploring the viability for a connection at the Isle of Grain which if selected, confirms that no such co-ordination would be possible for Lion Link.

#### Proposed Landfall

Paragraph 2.3.48 states *'The proposed Landfall Site is the location where the proposed HVDC Submarine Cables would transition onshore. The submarine cables would connect to onshore cables at a buried Transition Joint Bay (TJB) which would be located within the proposed Landfall Site and defined by horizontal directional drilling (HDD) assessment. The extent of area that the TJB would occupy would be confirmed as the design develops and would occupy an area of up to 100m<sup>2</sup> based on an indicative footprint of 20m x 5m, however a larger temporary area of up to 2ha would be required during installation to accommodate construction equipment and storage'*.

ESC notes that HDD is to be used at the landfall site, however it is anticipated the installation of the TJB will require 'top down' digging. It is also noted that a land requirement of 100m<sup>2</sup> is a large area and the footprint of the buried TJB in relation to the dynamic shoreface must be considered, with allowance for climate change impacts and worst-case storm scenarios. ESC requires robust evidence that current and future rates of coastal change have been fully considered.

Paragraph 2.3.89 states *'Where the trenchless technique exits the seabed, a temporary pit (dimensions in the region of 10m wide, by 30m long by 2m deep) may need to be excavated to support the push-in of the ducts. A jack-up/spud barge or multi-cat may be located close to the target exit point (to support excavation works and handling of duct pipes). Excavators may also be used to support the excavation works, which would either access the work site from the beach or be deployed from a vessel such as a jackup/spud barge'*.

ESC notes that open pits are still required despite the proposed use of HDD, therefore the impact of digging these must be assessed in the EIA. It is also noted that the use of heavy plant on the beach could have significant impacts on coastal geomorphology and ecology i.e. the protected vegetated gravel habitat. This activity must be thoroughly assessed in the EIA in relation to the specific physical environmental conditions of the landfall sites. This activity Should not be scoped out of EIA.

## Onshore Scheme Construction 2-14

### Construction programme

Whilst it is appreciated that the construction programme dates are indicative as stated in paragraph 2.3.56, paragraph 2.3.57 indicates that construction works would be expected to begin in 2026, with completion expected in 2030. The construction works could therefore coincide with the construction works associated with several other consented and proposed NSIPs. The full cumulative impacts of the potential simultaneous or sequential construction programmes on the environment and local community needs to be carefully and robustly assessed.

Paragraph 2.3.57 also states *'Friston Substation: Amendments to Friston Substation would take up to 13 months. Construction of the proposed Friston Substation, if necessary, would take 18-24 months which is typical for a new build substation'*. It was understood under the East Anglia One North and East Anglia Two applications that construction works for the proposed Friston substation could be spread over a four-year period due to the need to time the works with outages. ESC would welcome confirmation and clarification if

there has been further refinement of the construction timescales since the granting of the East Anglia One North and Two DCOs.

#### Site preparation works

The enabling works described in paragraph 2.3.59 are noted. Given that enabling works are often sought to be undertaken pre-commencement, ESC would like to highlight at this early stage that the local authority will require appropriate management of these works through a separate management plan, if the main management plans are not triggered until commencement.

#### Proposed Landfall

Paragraph 2.3.86 states that 'The offshore HVDC Submarine Cable installation at the proposed Landfall would be via a trenchless technique at each of the landfall sites, due to the height difference between the areas proposed for the onshore compounds and the offshore exit point for the trenchless technique'. Trenchless techniques are preferred by ESC as they reduce the impacts on the coastal environment and designated habitats.

#### Onshore Decommissioning 2-25

##### Proposed Friston Substation

Paragraph 2.3.106 states *'The lifespan of substation equipment is approximately 40 years. If it was determined that elements of the proposed Friston Substation were no longer required, they would be disconnected from the system before being dismantled and recycled or reused if possible. It is likely the decommissioning methods would be similar to those required to install the asset and decommissioning would be separately assessed at the time. As a result, it is not proposed to assess the impacts of decommissioning as part of the EIA'*. ESC notes that decommissioning of the proposed Friston substation, dependent on the number of connections, could become quite complex and requires careful consideration of any decommissioning plans.

##### Proposed Converter Station

ESC notes in paragraph 2.3.107 that *'The anticipated operational life of the proposed Converter Station is approximately 40 years. It is likely that during this period refurbishment and plant replacement would extend the life of the proposed Converter Station'*. Whilst it is stated in paragraph 2.3.106 that *'The lifespan of substation equipment is approximately 40 years'*, there is no mention of this being extended in the same way that the proposed converter station could be. Further clarification is therefore necessary to understand the relationships between the relative lifespans of the substation in comparison to the converter station. In addition to this, how will decommissioning of the National Grid substation also be managed when it connects multiple projects to the grid and is therefore subject to multiple DCOs.

#### Chapter 3. Assessment of Alternatives 3-1

### 3.4 Outline of siting and routeing process 3-2

Paragraph 3.4.2 states *'Stage 1 – Identification of study area: This step sought to identify the extent of the study area within which converter station, landfall locations and cable corridors could be developed. The connection point to the proposed Friston Substation was used as the basis for defining the study area associated with the converter station and landfall locations'*. It is understood that Lion Link will be progressing a connection at the Friston site for the project alone or incorporating Sea Link / Nautilus projects either with or without the approved SPR EA1N / EA2 projects (noting both SPR projects remain the subject of legal challenges and are yet to be awarded CfD in the 2024 auction round). ESC notes that proximity to the Friston site directly influenced the siting of the converter and landfall for the project. It is essential that NGV commits to further consideration of their site options assessment following the outcome of the two Judicial Reviews, and dependent on the outcomes, this may require the assessment to be retaken. Without this commitment, the requirement to consider alternatives would be based on incorrect assumptions regarding the proposed Friston connection site.

### 3.5 Siting and routeing appraisal 3-3

#### Converter Station 3-3

Paragraph 3.5.2 states that *'A study area within 5km of the proposed Friston Substation was used to determine potential locations for a converter station'*. ESC is not aware of any specific geographical reason why the Lion Link project needs to connect in this area. In fact, NGV has announced that an alternative connection location is being considered for the Nautilus MPI at the Isle of Grain in the Thames Estuary. If there is indeed no geographical reason why Lion Link needs to connect in this area (noting the project does not propose connections with British offshore wind in this region), ESC would welcome NGV similarly exploring alternative connection opportunities for this project which could provide greater opportunities for coordination.

NGV has identified possible converter station sites within a 5km radius of the proposed Friston substation based upon its experience and industry standard requirements, adding that the most efficient technical solution is to locate the converter station as close to the proposed Friston substation as possible for a variety of technical reasons, including minimising disruption and land take required for cable burial. The siting and routeing options were originally predicated on the SPR consents and should there be any change to the status of the consents in the future, NGV will need to review the principles underpinning the site selection process for the Lion Link project. ESC continues to have significant concerns about the current proposals for this project and does not accept the current siting justification provided by NGV for the proposed onshore infrastructure, or the need case for the additional connection at SPR's Friston site (with or without the SPR projects).

### 3.7 Next Steps 3-12

#### Detailed routeing and siting 3-12

Paragraph 3.7.2 states *'The detailed routeing and siting process continues and extends on the earlier approach, evolving from a desk-based baseline to site survey data as it becomes available, alongside input from statutory and local stakeholders. The process will also consider the feedback from future consultation activities to inform and review specific location and alignment options identified within the preferred cable corridors, landfall site and converter station site as well as opportunities for mitigation, including landscaping and biodiversity net gain'*.

ESC welcomes the commitment to delivering biodiversity net gain, noting later in the Scoping Report that NGV will be undertaking a *'Biodiversity Net Gain (BNG) assessment of the proposed Onshore Scheme'*. It is understood that Sea Link has committed to a minimum of 10% BNG across the project. This commitment is welcomed and should be echoed for Lion Link, noting emerging preference is for a longer onshore cable route between the landfall and converter station site, encompassing most of the East Suffolk District. Opportunities to exceed the minimum BNG requirements across the entire onshore order limits must therefore be fully explored.

#### Chapter 4. Legislation and Policy Overview 4-1

##### 4.1 Introduction 4-1

##### 4.2 Key Legislation 4-1

ESC fully supports the Secretary of State's decision to issue a Direction that confirmed the project should be treated as a development for which a Development Consent Order (DCO) under the Planning Act 2008 is required. ESC requested that National Grid seek a Direction and provided a letter of support to be submitted with the application.

#### Chapter 5. EIA Approach and Method 5-1

##### Temporal scope 5-3

Paragraph 5.4.13 states *'Construction effects are effects that are likely to occur during the construction phase of the proposed Scheme and are typically temporary or short-term. Construction is currently anticipated to commence in 2026 and take approximately 4 years to complete'*. Whilst ESC accepts that construction effects will last no more than 4 years, further clarification will be required in relation to the definition of temporary and permanent effects. Whilst there are some effects that will cease when the activity or work is stopped or removed, the activity will occur over such an extended period of time that they should be considered permanent in assessment terms.

##### 5.5 Assessment of effects and determining significance 5-4

##### Determination of significance 5-7

Paragraph 5.5.11 states *'In order to provide a consistent approach to expressing the outcomes of the various studies undertaken as part of the EIA, and thereby enable comparison between effects upon different environmental components, the significance of effect will be described using the terms neutral, minor,*

*moderate or major, except where required otherwise by guidance. Within the EIA process, 'significant' effects are considered to be those where the significance of the effect is assessed as being 'moderate' or greater. Minor or neutral effects are generally deemed to be 'non-significant'.* See below response to Section 5.6 regarding intra-project cumulative effects.

#### 5.6 Cumulative effects assessment 5-8

ESC notes the detail provided in Section 5.6 regarding 'Intra-project effects' and 'Inter-project effects', however, wishes to highlight that whilst 'significant' effects are considered to be those where the significance of the effect is assessed as being 'moderate' or greater, when intra-project cumulative effects are taken into consideration, individual not-significant impacts could become significant when their interrelationship is assessed.

#### 5.11 Consultation and engagement 5-10

In reference to complaints and community engagement, ESC highlights that effective community engagement and complaint response (and where appropriate resolution) is a key part of all stages of large-scale projects such as Lion Link. The project should have well developed community engagement and complaint procedures, the latter of which should include notification to and engagement with the LPA within a reasonable time period. The measures to be employed should be detailed in the Code of Construction Practice (CoCP) or in a separate management plan secured through the DCO.

#### 5.12 The Rochdale Envelope 5-11

The need for the Rochdale Envelope approach ahead of detailed design of the project is noted and accepted. Whilst this is accepted to ensure a realistic 'worst case' assessment, it is essential that there is a commitment from the developer that all reasonable efforts will be made post consent to seek reductions in the parameters set on the 'worst case' basis. The developer should seek to achieve the delivery of a 'best-case' project to reduce the actual impacts of the project. ESC notes that NSIPs are meant to be exemplar projects due to their scale and national significance. ESC expects a commitment to this to be reflected in a Design Principles Statement secured through the DCO.

### **Scoping Report – Main Text - Onshore**

#### **Chapter 6. Air Quality 6-1**

#### 6.3 Baseline conditions 6-2

#### Baseline 6-4

Paragraph 6.3.15 states '*ESC have declared one AQMA in the local authority, The Suffolk Coastal District Council AQMA No.3, but as the AQMA is located more than 2km from the Onshore Scoping Boundary, it is not of concern for this assessment*'. It may well be the case that the Air Quality Management Area (AQMA) is more than 2km from the onshore scoping boundary, however construction related traffic has the potential to cause impact further afield than that assessed, especially if traffic travels through the AQMA at Stratford

St Andrew (southwest of Saxmundham and close to the proposed converter station site). ESC suggests a wider scoping boundary should be considered to include impacts on the wider road network and potential impacts on junctions, considering cumulative effects with other developments.

#### 6.6 Scope of the assessment 6-13

Paragraph 6.6.6 states that *'The assessment will consider both human health and ecological receptors. Air quality effects associated with additional road traffic during the construction or operational phase will be assessed at receptors (both human and ecological) within 200m of roads that experience a change in traffic which meet criteria outlined in the EPUK/IAQM landuse planning guidance'*.

ESC agrees that the impact from traffic emissions associated with the project should be assessed against Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) landscape planning guidance. However, we remain concerned that there is a large quantity of energy infrastructure development planned within the district over the next decade with significant impacts related to the numbers of heavy good vehicles (HGVs) on the road network (and possibly light goods vehicles (LGV)/cars). Many of these developments (even large NSIPs), individually assessed, will show traffic levels under the screening values in the guidance and thus it will be concluded that no further assessment or mitigation is required. However, ESC remains concerned that potential cumulative impacts are not being sufficiently assessed holistically which is paramount given the large numbers of NSIPs planned within the pipeline. ESC therefore wishes to stress the importance of a cumulative assessment of the impacts covering all approved/proposed development in the areas potentially impacted by this project.

Paragraph 6.6.7 states that *'As a result of the number of nearby sensitive receptors, construction dust will be scoped into this assessment. A dust risk assessment will be appended to the Construction Environmental Management Plan (CEMP), to document the compliance assessment and to identify any further good practice measures. This will follow the approach set out in the IAQM Construction Dust Guidance'*.

In respect of the proposed dust risk assessment appended to the Construction Environmental Management Plan (CEMP), ESC would welcome inputting into this document. Given the soil conditions in the local area, it is likely dust could be a significant issue and so consideration should be given to Dust Management Plans to ensure that mitigation is designed and deployed appropriately, and these should be approved by the local planning authority.

ESC notes within Table 6-3 'Proposed scope of assessment' that construction air quality impacts have been scoped into the assessment in reference to ecological and human receptors, this is welcomed.

Paragraph 6.6.10 states that *'Assessment of emissions from construction generators and [Non-Road Mobile Machinery] NRMM has been scoped into the EIA due to the potential of temporary deterioration of local air quality. Best practice measures will be recommended to minimise the emissions from these sources and therefore the resulting impacts will unlikely be significant'*. ESC supports this as there is not yet sufficient detail to state that emissions from NRMM will not be an issue and this will need to be considered further.

ESC is pleased to see that following meetings between the authorities and Lion Link, that construction dust impacts and the impact of NRMM are both now scoped in. It is acknowledged that construction routes and site entrances are not yet known and therefore the study areas for traffic emissions are yet to be defined. As discussed in the meeting, there is likely to be a need to consider the impact of road traffic pollution on the wider road network, i.e. further than the current proposed 2km. This is of particular relevance to the assessment of the cumulative impacts with other projects in the area.

In terms of receptors, it is important to consider isolated receptors in addition to those in towns and villages. There are isolated receptors nearer to source than those stated in paragraphs 6.3.27–3.3.46. Proposed study areas when proposed and accepted, will not prejudice complaints from sensitive receptors from further afield should they be received in the event that the project is consented and implemented.

It should be recognised that the control measures listed in paragraph 6.5.4 are examples of mitigation and that mitigation is not limited to these.

In reference to paragraph 6.6.7, ESC notes that a full Dust Management and Monitoring Plan (DMMP) (not the dust risk assessment as specified) needs attaching to the CEMP or CoCP. It is agreed that the Construction Dust Assessment Methodology should follow the IAQM guidance. However, there is no mention of monitoring of pollutants to measure compliance. It is therefore important that the project commits to preparing a DMMP which will be submitted and approved prior to commencement with further Dust management Plans (DMPs) required at contractor level if detail is not available at the time of development of the DMMP.

## Chapter 7. Agriculture and Soils 7-1

### 7.6 Scope of the assessment 7-8

ESC notes the scope of the Agricultural and Soils assessment and has no specific comments at this time.

## Chapter 8. Ecology and Biodiversity 8-1

### 8.3 Baseline conditions 8-4

#### Study area 8-4

ESC notes the buffer distances for the desktop study area set out in paragraph 8.3.3, these are considered acceptable for the assessments proposed.

#### Baseline data sources 8-5

The sources of baseline data set out in Table 8.1 are noted. Whilst obtaining data on non-statutory designated sites; Protected, locally scarce and rare species; Invasive Non-Native Schedule 9 species and Ancient, Veteran and Notable Trees is welcomed, it is noted that this data was provided in January 2023. Given the time which has elapsed since that date, it is requested that the Environmental Impact Assessment is based on an up-to-date data search to ensure that all necessary available records are considered in the assessment.



In reference to 'Statutory designated sites: national value', whilst it is correct that there are a number of nationally designated sites (particularly Sites of Special Scientific Interest (SSSIs)) that have overlapping boundaries with international sites (paragraph 8.3.13), it is important that the assessment recognises that these sites do not necessarily share the exact same designation features. It must be ensured that the assessment appropriately considers all relevant designation features for both national and international designated sites.

In reference to 'Irreplaceable habitats', whilst consideration of irreplaceable habitats within the scope of the assessment is welcomed, the habitat types identified in paragraph 8.3.20 appear to include several which do not qualify as irreplaceable. It is recommended that the recently published national guidance on irreplaceable habitats ([Irreplaceable habitats - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/irreplaceable-habitats)) is used to determine which qualify as irreplaceable and which are notable for their nature conservation value.

In reference to 'Notable habitats', it is noted that paragraph 8.3.26 states that Biodiversity Metric 4.0 will be utilised for the BNG assessment for the project. Metric 4.0 was replaced by the Statutory Biodiversity Metric in February 2024. Whilst it is acknowledged that this project will not be required to deliver mandatory BNG, nevertheless it is requested that the Statutory Metric is used for this project rather than Metric 4.0. It is noted that paragraph 8.7.21 commits the project to using the Statutory Metric.

In reference to 'Bats', whilst the species identified as potentially present in the study area (paragraphs 8.3.30 to 8.3.34) are accurate, it should be noted that a previous infrastructure project surveying close to the southern end of the Scheme Scoping Boundary recorded a single record of a Lesser Horseshoe bat (*Rhinolophus hipposideros*) during activity surveys. It is therefore requested that the analysis of bat survey data for this project considers the potential presence of this species in the area as part of the assessment. The proposed use of advanced licence bat survey techniques (ALBST) (paragraph 8.3.40) is noted, it is requested that the proposed trapping locations are confirmed with the Local Planning Authority (as well as with Natural England as the licensing authority) prior to this survey work commencing.

In reference to 'Breeding birds' and 'Wintering birds', whilst these sections highlight the importance of the area for breeding and wintering birds, particularly in relation to those species for which nearby Special Protection Areas (SPAs) are designated, it must be ensured that the assessment considers all breeding and wintering birds that may be impacted. In particular, it is essential that species for which other designated sites in the area are designated (including those with overlapping boundaries with the SPAs) are appropriately considered.

With regard to wintering bird surveys, it is noted that paragraph 8.3.58 states that survey methodology for the winter 2023/24 survey season is to be agreed with Natural England. Given that this survey window is now substantially complete it is hoped that agreement was reached prior to the survey work being undertaken. Confirmation of this would be welcomed.

## 8.6 Scope of the assessment 8-51

In reference to Table 8-8 'Proposed scope of the assessment', the scope identified is broadly acceptable, however it is considered that construction impacts (fragmentation, direct mortality, disturbance) on species for which international and national designated sites are designated need to be considered as specific receptors/impacts. Whilst impacts on habitats at the designated sites and impacts on protected/notable species are scoped in separately, we consider that assessment of impacts on such species where they are designated site features needs to be specifically included to ensure that they are fully considered in the assessment.

#### 8.7 Assessment methodology 8-55

##### Data sources 8-55

In reference to 'Expected survey requirements', it is noted from paragraph 8.7.5 that an Ecology Survey Strategy (ESS) has been produced for agreement with Natural England. ESC would welcome the opportunity to view this and to comment on the detail of the strategy for surveys scheduled to be undertaken in 2024.

##### Supporting assessments 8-61

Paragraph 8.7.20 notes that the project intends to agree the Habitat Regulations Assessment (HRA) Evidence Plan with Natural England through their Discretionary Advice Service (DAS) process. Given the international importance of the sites to be included in the Evidence Plan and HRA, it is essential that ESC and other relevant expert stakeholders are included in any discussion and agreement of the Evidence Plan, alongside Natural England.

### Chapter 9. Geology & Contamination 9-1

#### 9.7 Assessment methodology 9-17

##### Assessment method 9-18

Paragraph 9.7.10 states *'With respect to existing land contamination, a source-pathway-receptor approach will be applied to examine how the proposed Onshore Scheme would influence baseline conditions. The general approach outlined within the EA Land Contamination: Risk Management (LCRM)<sup>16</sup> guidance will be adopted for assessing risks. Potential contaminants will be identified using the Department of Environment (DoE) Industry Profiles series of documents<sup>17</sup>. Conceptual models will be developed for each of the baseline, construction, and operation scenarios, with the risks arising from the identified pollutant linkages assessed qualitatively. These risks will be compared to identify any impacts arising from the construction or operation of the proposed Onshore Scheme'*.

ESC advises that there is an expectation that land within the development area will be subject to assessment for land contamination in line with relevant guidance and legislation (including BS10175:2011+A2:2017 and the Land Contamination Risk Management (LCRM)) to ensure that contamination is identified and dealt with appropriately in respect of the development and in order to protect sensitive receptors both on-site and offsite. The developer should also develop a robust discovery strategy to cover the eventuality that

unexpected contamination is encountered so that it may be appropriately addressed. This should include consultation and agreement with ESC in respect to the management of and land contamination that is found.

## Chapter 10. Health and Wellbeing 10-1

ESC is aware that there are growing concerns being raised in the local community about the impacts of multiple NSIPs on their health and wellbeing, particularly their mental health. ESC therefore requests that given the unique situation being faced in this locality, that greater focus in the area of Health and Wellbeing is required, including robust assessments and appropriate mitigation being provided.

### 10.5 Design and control measures 10-11

#### Control measures 10-12

Paragraph 10.5.5 states *‘A Community Framework would be produced, which would set out the key measures to protect the community from adverse effects and provide a process for dealing with concerns or complaints. Appropriately experienced community relations personnel employed to implement the Framework and provide a point of contact for community issues’.*

The developer will be aware that effective community engagement and complaint response (and where appropriate resolution) is a key part of all stages of large-scale projects. The nature of community engagement by a developer can have a significant impact on the local communities’ experiences. The project should have well developed community engagement and complaint procedures, the latter should include notification to the local planning authority within a reasonable time period.

In reference to paragraph 10.5.5 and the *‘use of appropriate lighting to prevent glare’*, a construction and operational lighting plan should be developed to consider, manage and mitigate the impact from temporary and fixed lighting associated with the construction of the landfall, cable routes and substation and from the operation of the substation. A Lighting Management Plan should ultimately be provided and agreed with the relevant authorities and secured through the DCO

## Chapter 11. Historic Environment 11-1

### 11.6 Scope of the assessment 11-12

In reference to Table 11-4 ‘Proposed scope of the assessment’, whilst all aspects are scoped in which ESC supports, we wish to stress the importance of assessing both direct and indirect impacts through the alteration of the historic landscape. There is a significant amount of information available in relation to the historic landscape character of the Friston substation site submitted as part of the East Anglia One North and East Anglia Two DCOs. Appendix 1 of the Council’s joint Local Impact Report written in relation to the East Anglia One North and East Anglia Two projects provides an assessment of the historic landscape of Friston and Knodishall ([EN010077-002772-DL1 - Suffolk County Council - LIR.pdf \(planninginspectorate.gov.uk\)](#)). ESC also wishes to stress the importance of considering known non-designated assets not yet on the Historic Environment Record (HER) within the assessment.

## 11.7 Assessment methodology 11-15

### Legislation, policy and guidance 11-16

Paragraph 11.7.12 states *‘Legislation and policy relevant to the proposed Scheme and this chapter is outlined in Chapter 4 Legislation and Policy Overview and Appendix 4-A National Policy, Appendix 4-B Environmental Legislation and Appendix 4-C Local Policy’*.

A review of Scoping Report Appendix 4C: ‘Local Policy of relevance to the proposed scheme’ identifies the Local Policy Framework applicable to the consideration of heritage assets. In reference to the Suffolk Coastal Local Plan (2020), the relevant policies pertaining to the historic environment include:

- Policy SCLP10.4: Landscape Character
- Policy SCLP11.1: Design Quality
- Policy SCLP11.3: Historic Environment
- Policy SCLP11.4: Listed Buildings
- Policy SCLP11.5: Conservation Areas
- Policy SCLP11.6 Non-Designated Heritage Assets
- Policy SCLP11.7: Archaeology
- Policy SCLP11.8: Parks and Gardens of Historic Landscape Interest

In reference to the Waveney Local Plan (2019), the relevant policies pertaining to the historic environment include:

- Policy WLP8.29 – Design
- Policy WLP8.35 – Landscape Character
- Policy WLP8.37 – Historic Environment
- Policy WLP8.38 – Non-Designated Heritage Assets
- Policy WLP8.39 – Conservation Areas
- Policy WLP8.40 – Archaeology

### Assessment method 11-17

Overall, the scope and methodology described in the documents correctly take into account the expected designated heritage assets; i.e. Listed Buildings, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens.

In reference to Table 11-5 ‘Importance/value criteria for heritage assets’, Grade II\* Registered Parks and Gardens should be included in the ‘High’ Value category.

In reference to Table 11-6 ‘Magnitude of impact descriptions’, most (if not all) of the impacts on designated heritage assets will be impacts on their setting. Setting should be specifically mentioned in the table as a ‘key characteristic’. Under ‘Medium’ Magnitude of Impact; the term ‘Loss of heritage asset, but not adversely affecting integrity’ does not make sense. If a heritage asset is lost, then its integrity will be lost. Should this reference be ‘Partial loss of heritage asset’? Further clarity on these matters is sought by ESC.

## Chapter 12. Hydrology, Hydrogeology and Drainage 12-1

### 12.1 Introduction 12-1

ESC will primarily defer to the Lead Local Flood Authority (LLFA) and the Environment Agency for their technical review of this section of the Scoping Report. The Council would however like to take the opportunity to highlight the importance of adequately and robustly assessing flood risk from all forms of flooding including surface water flooding. Reviewing the converter station sites on the Environment Agency's surface water flood map identifies several flow water paths which could be affected by the project.

In relation to the grid connection location, there is a significant amount of published material available on the Planning Inspectorate's website submitted as part of the East Anglia One North and East Anglia Two DCO examinations. Friston village has been subject to surface water flooding on a number of occasions. A Surface Water Management Plan (SWMP) for the catchment of Friston village was commissioned by Suffolk County Council (SCC) as the LLFA. This includes a detailed assessment of the catchment topography and characteristics to accurately model surface water flow paths. Dependent on whether the Lion Link project progresses extensions to the proposed Friston substation or proposes a new substation, there is potential for the development to interact with the flow paths identified by the SWMP.

The project also has the potential to impact the drainage solutions identified at the Friston site including requiring the removal of one of the consented drainage basins to accommodate the National Grid extensions. It is essential the full cumulative impacts of the developments are carefully assessed and fully understood.

### 12.5 Design and control measures 12-17

#### Control measures 12-18

Paragraph 12.5.5 states *'Active licensed abstractions and private water supplies will be identified with landowners and appropriate measures would be considered during construction. In the event of a landowner or tenant reporting that installation activities have affected their water supplies, an initial response would be provided within 24 hours. Where the installation works have affected a private water supply, an alternative water supply would be provided, as appropriate'*.

ESC requires the developer to take measures to identify Private Water Supplies in the vicinity of construction works so that they can be planned and undertaken in such a way as to prevent impact to those supplies.

### 12.6 Scope of the assessment 12-20

In reference to Table 12-7 'Proposed scope of assessment', ESC notes that the operational impacts of the project have been scoped out of the assessment. This is not supported or considered to have been sufficiently justified within the Scoping Report. Operational impacts associated with the projects should be scoped in.

## Chapter 13. Landscape and visual amenity 13-1

### 13.3 Baseline conditions 13-3

### Study area 13-3

Paragraph 13.3.3 states *'Desk study and fieldwork has determined that intervening landform, buildings and vegetation generally limit the extent of views to within 3km from the Onshore Scoping Boundary. Beyond this distance, significant landscape and visual effects are not considered likely to occur. This is the area within which construction and operational effects could arise and is based on an understanding of the local landscape and experience of working on similar projects'*. ESC is satisfied that all onshore aspects of the project are included in the described scoping boundary to a satisfactory buffer limit of 3km and with the level of desk study and subsequent field work undertaken to determine the onshore scoping boundary.

### Baseline data sources 13-3

In reference to Table 13-1 'Scoping baseline data sources', ESC is satisfied with the list of baseline sources used to inform the assessment of likely landscape and visual impacts, although the applicant should confirm whether the Suffolk Coast and Heaths National Landscape Management Plan 2023-2028 has been included for consideration, noting that the Consultation Draft has since been upgraded to a fully adopted active Management Plan.

The general overarching descriptions of topography, hydrology, landcover, vegetation patterns, land use and settlement, movement and connections are acceptable, and the summary of landscape designations is noted. The initial proposed set of visual receptor groups is noted but equally noted and welcomed is the intention to continuously review and revise as appropriate as the study progresses and the project design evolves. The described scope of potential impacts that could arise during construction and operation is also noted and agreed.

### 13.5 Design and control measures 13-11

#### Design measures 13-12

Paragraph 13.5.3 states *'The LVIA will be a key tool in informing the design of the proposed Onshore Scheme, to minimise harm to the landscape and to provide reasonable mitigation where possible and appropriate'*. ESC welcomes the claim that the LVIA will be a key tool in informing the design of the proposed onshore scheme in order to minimise harm to the landscape and to provide reasonable mitigation where possible and appropriate, ESC expect this to be an underlying principle of the whole project.

The potential embedded design measures outlined at paragraph 13.5.4 are noted and welcomed and will be expected to be adhered to.

#### Control measures 13-12

The control measures described in paragraph 13.5.5 to 13.5.8 are noted, but it should be understood that the tree protection measures outlined at 13.5.6 will also be expected to include an Arboricultural Method Statement which shall include the appointment of an arboricultural Clerk of Works.

### 13.6 Scope of the assessment 13-13

ESC accepts the described scope of the assessment set out within Table 13-3 'Proposed scope of the assessment'.

#### 13.7 Assessment methodology 13-17

The described assessment methodology is accepted, however it is not clear how Table 13-4 'Establishing landscape value criteria' is supposed to read. In Table 13-9 'Susceptibility of visual receptors to change', it is considered that people engaged in outdoor recreation or travelling along public rights of way (PROWs) which are not promoted routes, but where an appreciation of the surrounding landscape is relevant to the experience, should be considered as having 'High Susceptibility' as visual receptors in accordance with GLVIA3 para 6.33.

In all other respects, the described scope of the landscape and visual impact assessment is acceptable.

### Chapter 14. Noise and Vibration 14-1

#### 14.3 Baseline conditions 14-2

The Baseline Conditions and Study Area are broadly acceptable, all assessments must be undertaken with some degree of flexibility taking account of any location specific issues if they are found to ensure the assessments are representative.

The proposed study area of 300m from construction areas is accepted, although this will not prejudice complaints from Noise Sensitive Receptors from further afield should they be received in the event the project is consented and implemented.

In terms of paragraph 14.3.9, ESC agrees with the statement that ambient (and background) sound levels in the majority of locations are likely to be low along with the context of the quiet rural residential environment which should be held uppermost in any assessment of significance of impact, moreover the context of introducing what will be an industrial noise source should also be considered in those assessments.

In terms of paragraph 14.3.12, DEFRA noise mapping should be used as an informative only and should not be relied upon at the expense of adequate and appropriate assessment.

#### Baseline 14-3

In reference to the 'Future Baseline', this topic is of critical importance and the impact on background sound level creep is something that requires careful consideration. The project should seek to prevent background sound level creep, or where robustly justified, mitigate and reduce it to an absolute minimum. This is particularly important at Saxmundham where the potential for co-location of substations from different projects exists and at Friston where there will be a requirement for increased infrastructure in respect to grid connection. Close coordination of projects is not only expected but insisted upon to prevent cumulative issues like background sound level creep and to prevent or minimise noise and vibration impact across the board in this low background rural residential area.

The project should also be aware of the site-specific constraints in relation to the noise rating levels set for Noise Sensitive Receptors in the area of the Friston connection site which were set in the East Anglia One North and Two DCOs which includes the National Grid Connection Infrastructure.

#### 14.4 Potential impacts 14-5

The matters noted in section 14.4 are a reasonable suggestion for the types of potential impacts to be expected and are therefore agreed. However, that being said, a significant amount of further detail will be required as the project progresses and assessments should be refreshed at reasonable intervals in order to take account of developments that occur to ensure that they are accurate and representative, this should be embedded in the project's ethos moving forward.

#### 14.5 Design and control measures 14-5

This section contains some broad categories and high-level controls that are appropriate to this project, they should however form a basis for the design and control measures for the project rather than it being confined to only those stated. It is accepted that at this early stage a commitment to controlling noise and vibration is indicated, but significantly more detail will be required in the form of a comprehensive Noise and Vibration Management Plan to be agreed with ESC and secured by the DCO.

The expectation is that appropriate, adequate, (and where necessary) exceptional standards of design and control measures will be selected to ensure that not only are all policy tests met, but that the impact to the local area is reduced to a reasonable minimum. Projects of this scale and nature, particularly where they are part of a wider landscape of NSIPs, are expected to provide exemplar protection to the area they are being placed within.

The developer has committed to Best Practicable Means (BPM), as defined in Section 72 of the Control of Pollution Act 1974 which is welcomed. This needs to be in conjunction with BS5228: 2009+A1: 2014 in respect of site operations and mitigation for noise and vibration. It is important that all relevant sections of BS5228 are considered and implemented including particularly section 8 – Control of Noise.

#### 14.6 Scope of the assessment 14-6

ESC considered that the developer has scoped in the relevant areas in terms of Noise and Vibration, however further surveys are required moving forwards and there is a general expectation that the developer will design and manage this project with the minimisation and mitigation of Noise and Vibration in mind as a critically important impact. The scope of assessment is broadly accepted, however as stated in paragraph 14.6.6, items that have been scoped out have been done so on the basis that there is clear evidence that impact will not be significant. This evidence will need to be discussed and justified in the PEIR with an appropriately detailed summary to ensure that these matters have been adequately considered and correctly scoped out. It is of critical importance that the scope of all assessments undertaken includes a robust assessment of cumulative effects with other NSIPs (and where appropriate, other large developments) within the district to ensure that combined impact is not unacceptable.



#### 14.7 Assessment methodology 14-10

The presented assessment methodologies are broadly accepted but with the following comments, caveats, and requirements:

*Legislation, Policy, and Guidance* - A list of relevant documents has been provided which is generally accepted, that said care should be taken using BS8233 as this is out of scope for a development of this type. Equally, whilst the inclusion of NANR45 is welcomed as an acknowledgment of consideration of Low Frequency Noise (LFN), it too should be used with caution given the guidance's intended primary use to assist in the investigation of LFN as a Statutory Nuisance in a complaint scenario.

NPS EN-1, NPS EN-3 and the Noise Policy Statement for England from which the noise and vibration sections are derived should also be used in the consideration of noise and vibration for this project.

*Assessment Method* - Adequate cumulative assessment as detailed in paragraph 14.7.7 is a key element to the overall assessments for this project in order to identify and mitigate, amongst other things, background sound level creep in combination with other projects primarily at the Saxmundham substation site and Friston connection location, that said it is also essential any cumulative construction impact is considered and addressed across the project.

*Baseline Surveying* - The areas that will be covered by the baseline sound level surveys, being in the vicinity of noise sensitive receptors near the proposed Friston Substation Site, proposed Underground Cable Corridor, proposed Converter Station Site and proposed Landfall Site, is accepted along with the standard to be used in respect to the surveys, that being BS 7445-1:2003. Further engagement with us on the detail of those surveys has been committed to and is welcomed.

*Construction Noise* - The developer has stated that BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise, and specifically the “ABC” methodology of that standard is to be used to assess and control noise on this project.

Likewise, the developer has stated BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration is to be used to assess and control vibration. These are accepted as appropriate methodologies and accord with other comparable projects both consented and in consideration. Consideration of British Standard 6472-1:2008 for potential disturbance of people and British Standard 7385-2:1993 to assess risk of building damage are also accepted as appropriate.

*Construction Traffic Noise* - The developer has considered noise and vibration from construction traffic, it is assumed this is in respect of highway noise and vibration which is a Highways Authority matter, and that site construction traffic noise and vibration will be considered in respect of the overarching construction noise and vibration requirements under BS5228.

*Operational Noise* - The proposed study area of 1000m from the proposed substation site and the Friston site is accepted as reasonable, the inclusion of a mechanism to include more distant Noise Sensitive Receptors should the necessity arise is welcomed. In respect to Friston, the developer is again advised that

the National Grid Connection Sub Station is included in the East Anglia One North and Two DCOs in respect to the rating level for the site, this is a site wide constraint that they will have to consider in their assessments, and practically meet in operation.

The developer has proposed BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS4142) in respect of operational noise assessment and this is accepted.

ESC's current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications, but is equally relevant here and has been stated for other DCO projects within the district:

*'Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified'.*

Due to the size of these types of project, the 5dB below background is an aspirational target and one we ask developers to consider as the appropriate limit, deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible reasonable noise level which we will also require robust justification for, this should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of National Policy Statement (NPS) EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise noise impact.

The overall expectation for operational noise is that a robust assessment will be undertaken using BS4142, that an appropriate rating level will be proposed relative to an appropriate representative background sound level and that it will inform design and mitigation so as to reduce noise impact to an absolute minimum. There will be a need for a requirement in the DCO and dependent on the rating level that is proposed there may be a need for a further requirement with a commitment to reduce that rating level further should it be possible to do so at a later detailed design and implementation stage. The need to keep impact from operational noise to an absolute minimum cannot be understated and we will require robust justification in reaching agreement.

The consideration of tranquillity as outlined in the Tranquillity Map: England is welcomed but it is important to consider the overall sensitivity of the area in this regard, particularly in terms of the current sound environment vs future potential noise character. This has been committed to as part of the assessment process which is further welcomed, however ESC wish to reiterate it here due to its importance in informing the determination of significance.

BS8233 and World Health Organisation (WHO) guideline levels may be considered in regard to a well-rounded assessment of impact, but their use should be done with caution, particularly in terms of BS8233 which as previously stated is out of scope for this type of development even if it is regularly used in this context.

*Determining Significance of Effect* - when determining significance of effect, the relevant policies will need to be satisfied, that is to say NPS EN-1 and the Noise Policy Statement for England (NPSE) and should relate back to a recognised standard that ascribes significance of impact such as BS4142 in respect to operational noise.

As previously stated, the acoustic character of the noise, the context of that noise and the context of the area should play an important role in determining significance alongside the objective monitoring, assessment and modelling of noise.

#### 14.8 Assumptions and limitations 14-15

Whilst the assumptions and limitations stated are broadly accepted, ultimately, ESC require a robust set of assessments to ensure that the conclusions that are made result in adequate protection to noise sensitive receptors. The precautionary approach stated is welcomed but is also expected to ensure that any uncertainties that are inherent in these assessments are kept to a minimum. ESC requires a firm commitment to refreshed assessment as necessary when significant further details become known to refine the outcomes in respect to significance and control of impact.

### Chapter 15. Traffic and Transport 15-1

#### 15.1 Introduction 15-1

Whilst ESC defers to SCC as the Local Highway Authority for their technical input on this section of the Scoping Report, ESC would like to make some high-level comments.

#### 15.3 Baseline conditions 15-2

##### Study area 15-2

Paragraph 15.3.2 states that *'The extent of the study area for the assessment of transport impacts has not been defined in detail at this stage'*, with paragraph 15.3.4 adding that *'The study area will be reviewed and, as appropriate, refined for the assessment in the Preliminary Environmental Information (PEI) Report and Environmental Statement (ES) with only one Landfall and one High Voltage Direct Current (HVDC) Underground Cable Corridor being taken forward. The study area will be based on the proposed Order limits in the ES'*.

The commitment to review the proposed study area is welcomed. ESC would like to be included in these discussions given the Council's detailed knowledge of the district and the linkages with effects on air quality. It is important to ensure that the study area is not too narrowly defined and includes appropriate

consideration of junctions. It is also considered there is potentially the need to assess network locations beyond the point where the construction traffic would connect to the A12.

The study area must be sufficiently sized to consider the potential inter-project cumulative impacts during the construction phase of the project with consented and proposed NSIPs and other major projects. These impacts need to be carefully considered and appropriately and adequately assessed and mitigated. Assessing the onshore study area only is considered inadequate.

## Chapter 16. Socioeconomics, Recreation and Tourism 16-1

### 16.2 Consultation and engagement 16-1

The ESC agrees with the main thematic issues raised during the non-statutory consultations and remains particularly concerned with the potential adverse impacts of the project on:

- a) The visitor economy in East Suffolk, especially visitor perception and experience during the construction phase of the project;
- b) Businesses located within the Scheme Scoping Boundary, as well as those businesses in proximity of the boundary;
- c) The themes raised by other special interest groups and organisations.

In addition, the potential 'in-combination effect' of the project and other NSIPs locally is of significant concern.

ED&R welcomes any opportunity to secure employment or apprenticeship opportunities for local residents during the construction or operational phases of the project.

ESC welcomes the opportunity for further engagement and discussion relating to;

- a) The extent of the study area;
- b) The local businesses identified as receptors;
- c) And the assessment of the potential impact on tourism.

### 16.3 Baseline conditions 16-3

ESC considers the aspects considered within the structure of the baseline to be appropriate. However, for local businesses, the impact on town centre vitality might also be a useful measure of socio-economic impacts of the project. Both within and in near proximity of the scoping boundary.

### Study area 16-3

ESC welcomes confirmation that the option to review and refine the study areas is embedded within the Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES). Particularly as ESC is concerned that the local study area appears to encircle, and therefore omit an assessment of project impacts on the town of Southwold. Equally, impact on the town of Saxmundham has been omitted despite

its close proximity to the scoping boundary and local study area limits. ESC feel that the local study area limits should be extended to fully include the towns of Southwold and Saxmundham.

#### Baseline data sources 16-4

ESC remains concerned that the baseline data for key receptors such as businesses will be sourced solely from internet-based searches. Internet based searches can be limited by the timeliness and availability of the data, its specificity and relevance, especially for a relatively small local study area. The sole reliance on desk-based research is puzzling to ESC and therefore not supported.

*Employment, economic activity, and the labour Market* - ESC questions the sensitivity of the age profile, employment and economic activity, and industry of employment to the socio-economic impacts of the project, and thereby limiting its value as reference indicators. Especially as the frequency and timeliness of updated data is limited.

*Local Businesses* - ESC would like to re-iterate that it seems short-sighted to omit the town centres of Saxmundham and Southwold from the local study area. Particularly as parts of each town fall within the planned limits of the local study area.

*Visitor Attractions and Tourism Destinations* - ESC concur that 'much of the local study area', and probably all, is considered a visitor destination and of considerable importance to a successful visitor economy.

Equally, many of the towns and villages locally, as well as the individual visitor attractions identified within Table 16-6 'Visitor attractions within the local study area' are important contributors to the visitor economy.

#### 16.4 Potential impacts 16-13

##### Construction 16-13

ESC agrees with the potential impacts described in paragraph 16.4.2 during the construction phase. The Council agrees with the assessment that the majority of the socio-economic impacts generated by the project would be experienced during the construction phase only; and that the operational phase could have positive direct impacts on employment.

#### 16.5 Design and Control measures 16-13

##### Design measures 16-14

ESC welcomes any design measures that limit the potential impacts of the project whilst recognising that some impacts are inevitable.

##### Control measures 16-14

ESC welcomes the control measures described to limit the magnitude of impact on receptors but would encourage continued review and exploration of additional control measures that could limit the impact of the project.

## 16.6 Scope of the assessment 16-14

ESC has reviewed the receptors in Table 16-8 'Proposed scope of the assessment' and agree with the assessment in terms of potential impacts during the construction and operational phases of the project. However, it is more difficult to consider the lasting impacts of the project on receptors during the operational phase and therefore ESC remain cautious.

## 16.7 Assessment methodology 16-22

### Data sources 16-22

ESC has been clear that there may be an over reliance on desk-based studies during the assessment. Whilst we recognise the value of desk-based research, it remains to be convinced that this is the best approach and look forward to reviewing the evidence base as it unfolds.

## Chapter 17. Material assets and waste 17-1

### 17.1 Introduction 17-1

ESC notes the scope of the assessment and has no specific comments at this time.

### **Scoping Report – Main Text – Offshore**

ESC is disappointed to learn that the proposed landfall options for Lion Link requiring the shortest onshore cable route have both been discounted (i.e. Landfall E Aldeburgh and Landfall H Dunwich). Justification is provided for this stating that the Aldeburgh landfall was discounted primarily due to significant environmental and technical risks associated with the nearshore approach to the site, crossing up to 11 other cable routes within the Outer Thames Estuary Special Protection Area (SPA). Given that the crossing of other subsea cables making landfall in the locality has been cited as a constraint factored into the emerging preferences for landfall, ESC highlights that insufficient information is provided regarding what the cables routes are for and whether these are constructed, consented, or proposed cable routes. Further justification for the discounting of the Aldeburgh landfall is necessary given the potential coordination opportunities.

## Chapter 18. Marine Physical Environment 18-1

### 18.3 Baseline conditions 18-2

#### Baseline 18-3

Paragraph 18.3.7 states *'This section provides a summary of the baseline marine physical environment in the study area, based on a review of tidal regime, meteorological information, wave climate, bathymetry and seabed sediment data and information from desktop study/reports. In addition, consideration is given to the future baseline, assessing potential for change during the operational lifetime of the Offshore Scheme'*.

ESC welcomes a thorough investigation in to marine and coastal environmental baseline conditions (established at scoping). However, clarification should be provided as to how the project-induced deviation

from the baseline will be ascertained and differentiated from naturally-induced (i.e. climate and geomorphological changes) to baseline conditions over time? This should be given consideration and explanation in the Environmental Impact Assessment (EIA)/Environmental Statement (ES).

Table 18-1 'Key data sources for baseline assessment' includes reference to '*Shoreline Management Plan – SMP7 - Local annual surveys of coastline - Coverage Relative to Study Area: Coastal*'. ESC wishes to highlight that the SMP description is incorrect. SMP's are non-statutory, high level, strategic policy documents for coastal flood and erosion risk management and planning purposes. The description error must be corrected. The SMP7 is a key document to consult however it is also old and better data is available from more contemporary sources. The EIA must show reference to a wider bibliography and fresh data for baseline assessment.

Table 18-1 also includes reference to the East Anglia projects' EIA and supporting studies regarding 'Review of baseline characterisation data'. It is positive that these reports, which are good examples of geomorphological change assessment, are referenced by NGV. ESC would like to see NGV adopt a similar approach to that used by SPR in their Landfall Location Assessment, with justification of final site selection.

#### 18.6 Scope of the assessment 18-18

Paragraph 18.6.7 states '*The physical processes features which are considered as potential receptors will be guided by the tidal excursion and will include: The adjacent coastline, particularly at the proposed Landfall sites (Southwold and Walberswick); Designated sub-tidal sandbanks; Nationally or internationally designated sites with seabed/sedimentary or geological interest features below MHWS; and Designated bathing waters*'.

The specific features/receptors of the generic 'coastline' at each landfall site should be actually named, mapped and described in the EIA.

Table 18-4 'Proposed scope of the assessment' scopes out the Construction Phase - Coastal morphology Receptor - Changes to coastal morphology stating '*Where the submarine cable makes landfall, disturbance of the coastal morphology will be minimised by use of trenchless techniques. A comprehensive coastal processes assessment would be conducted to analyse shoreline erosion rates, shoreline retreat and beach draw down. The assessment will inform the onshore position of the transition joint bay, the trajectory of the HDD to ensure burial over the asset lifetime and the HDD exit point. The land to sea transition will be engineered to ensure asset security i.e., to ensure the cable does not become exposed. This design measure will avoid impacts on coastal morphology during construction and operation....*'.

ESC welcomes the comprehensive coastal processes assessment to be conducted, and only after this assessment is evaluated should the potential for significant effects be dismissed. ESC does not agree on scoping out of EIA. Despite trenchless techniques being used, there may be a coffer dam installed and therefore the impact to this receptor should not be scoped out prematurely.

#### 18.7 Assessment methodology 18-26

Data sources 18-26

In reference to Table 18-5 'Key publicly available data sources for physical processes' and Table 18-6 'Scope of geophysical and geotechnical cable route survey' regarding Topographic and Intertidal Survey, the Anglian Coastal Monitoring programmes (ACMP) open source data should also be added to the data sources which includes topographic transects over the landfall sites since 1991, Lidar data, bathymetry, and annual aerial photography. These sources should be used to help analyse current geomorphological and hydrological change rates. ESC welcomes the collection of contemporary data as per the intended intertidal survey, the data gathered can then be analysed and compared to the aforementioned ACMP data to give an overview of recent changes.

#### 19. Intertidal and Subtidal Benthic Ecology 19-1

##### 19.6 Scope of the assessment 19-13

Table 19-5 'Proposed scope of the assessment' scopes out 'Construction and operation - Intertidal and nearshore habitats - Temporary habitat loss / seabed disturbance' stating '*The HDD will exit seaward of the low water mark and will therefore avoid disturbance of the intertidal area. The boundary of the proposed Onshore Scheme lies above mean high water springs and therefore outside of the intertidal zone*'.

The Intertidal area should be considered as anywhere between Highest Astronomical Tide and Lowest Astronomical Tide. Despite the use of HDD techniques, the impact of construction and operation activities on the intertidal area should not be scoped out at this early stage. Heavy plant on the beach, in the event of access required, should be assessed within the EIA.

#### Scoping Report – Main Text - Offshore chapters 20 to 26 (20-1 to 26-24)

ESC has no comments to make at this time.

#### **Scoping Report – Main Text – Proposed Scheme Wide:**

##### Chapter 27. Climate Change and Carbon 27-4

ESC has no comments to make at this time.

##### Chapter 28. Major Accidents and Disasters 28-1

ESC has no comments to make at this time.

#### Chapter 29. Cumulative Effects and Intra-project Effects of the Project 29-1

##### 29.1 Introduction 29-1

The previous comments highlighted within this response which relate to cumulative effects are relevant to this chapter of the Scoping Report.

##### 29.3 Cumulative assessment methodology 29-2



This section sets out the methodology to be used for inter-project cumulative effects. Paragraph 29.3.13 states *'The first step is to establish the Zone of Influence (Zol) for the proposed Scheme and from that a long list of 'other existing development and/or approved development'*. ESC acknowledges the commitment stated in paragraph 29.3.17 *'The Zols will remain under iterative review in response to refinement of the proposed Scheme design, feedback from consultees, identification of additional constraints and results of assessments undertaken to inform the EIA'*. This commitment is welcomed.

#### 29.5 Co-location 29-24

ESC highlights that within the section on cumulative effects, the grid connection site at Friston is subject of a masterplan. Any future connections or works at Friston will need to carefully consider the implications of the works on the masterplan for the site, in addition to carefully considering the in-combination effects of the proposals. It is essential that the developer understands the sensitivity of the connection site. In the Examiner's Report on East Anglia One North and East Anglia Two the Examining Authority observes:

*'... that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.'*

To accommodate additional extensions to the proposed Friston substation, not only was it acknowledged at the time of the examination that the landscape and visual effects would be intensified, but the development would also remove the land currently identified for a drainage basin. This would therefore require fundamental changes to the masterplan for the site.

#### Chapter 30. Summary 30-1

ESC has no comments to make at this time.

**From:** Judith Stouff [REDACTED]  
**Sent:** 19 March 2024 16:12  
**To:** Lionlink Interconnector  
**Subject:** Re: EN020033 - LionLink - EIA Scoping Notification and Consultation

You don't often get email from [REDACTED]

Dear Sir/Madam,

Thank you for your consultation on the above site, received on 7<sup>th</sup> March 2024. We have reviewed the request as submitted and we are pleased to see that the Environmental Statement will include an assessment of flood risk. Notably it is vital that the hydrology, hydrogeology and drainage remain scoped at least in at the construction stage.

We have no further comments to make at this stage.

Kind regards,

Judith




**Judith Stouff BSc (Hons), MSc**  
Sustainable Development (National Infrastructure) Officer  
Water Management Alliance  
dd: [REDACTED]

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With our commitment to ISO 14001, please consider the environment before printing this e-mail.

Defenders of the Lowland Environment

Laura Feekins-Bate  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House (2 The Square) Temple  
Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** XA/2024/100069/01-L01

**Your ref:** EN020033

**Date:** 03 April 2024

Dear Laura Feekins-Bate

## **Environmental Impact Assessment Scoping Opinion**

### **Lionlink Multi-Purpose Interconnector**

Thank you for consulting the Environment Agency on the Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development.

We have reviewed the 'Environmental Impact Assessment Scoping Report' by National Grid (dated March 2024). We were consulted by the Planning Inspectorate on 06 March 2024.

### **Flood Risk**

Having reviewed the submitted scoping report and associated appendices, we have made the following comments in respect of fluvial and tidal flood risk, to ensure that the Environmental Statement (ES) addresses the key environmental issues for this proposal.

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.1**.

**(Table 1.1 Flood Risk and Coastal Management Position Summary)**

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Flood risk - main rivers	Scoped out	Should be scoped in (for all phases)
Flood risk - flood plains	Scoped out	Should be scoped in (for all phases)

Flood risk - sensitive receptors and critical infrastructure	Scoped out	Should be scoped in (for all phases)
Fluvial and tidal flood defense assets during all phases	Scoped out (not considered)	Should be scoped in (for all phases)
Decommissioning	Scoped out (not considered for the above issues)	Should be scoped in

Table 12-7

Overall, we agree with the decision to scope the following into the assessment:

- (Construction phase) – impact to main rivers, resulting in disturbance to surface water features and subsequent changes in flood risk, with potential for significant effects on proposed Underground High Voltage Direct Current (HVDC) Common Cable Corridor, Underground HVDC Southwold Cable Corridor, and Underground HVDC Walberswick Cable Corridor.
- (Construction phase) – impact to floodplains, resulting in disturbance to surface water flows and flood risk, with potential for onshore elements of the scheme to be impacted by flooding because of elements of the route being located within the fluvial and pluvial flood zones.
- (Construction phase) – impacts to sensitive receptors and critical infrastructure (flood risk from the proposed onshore scheme to surrounding area), due to changes to surface water flows and flood risk, resulting in potential for increased flood risk due to construction activities within the fluvial and pluvial flood zones.

We disagree with the decision to scope the following out of the assessment:

1. All flood risk aspects associated with the operation phase of the development, covering impacts to:
  - a. main rivers, resulting from changes to surface water flows and flood risk
  - b. floodplains (flood risk to proposed onshore scheme) resulting in changes to surface water flows and flood risk
  - c. sensitive receptors and critical infrastructure (flood risk from the proposed onshore scheme to the surrounding area), resulting in changes to surface water flows and flood risk
2. All aspects associated with the decommissioning phase of the development.

Our reasons for disagreement are as follows:

- Regarding point 1a above (the applicant's justification for scoping out the impact to main rivers in the operation phase of the development): is based on land within the cable corridor being reinstated following completion of construction works, with there being no permanent physical disturbance of water features. We would be willing to agree to this, provided that it can be confirmed that no part of the scheme will result in:

- an increase in built footprint, or raising of ground levels, anywhere within the 1 in 100yr, plus an allowance for climate change, fluvial flood extent (which has not been demonstrated)
- there will be no ground disturbance or increase in built footprint within the 1 in 100yr, plus an allowance for climate change, fluvial flood extent, associated with any inspection or maintenance activities during the scheme's operation
- Regarding points 1b & 1c above, the Scoping Report states that the decision to scope these elements out of the EIA, is due to the impacts being considered under the construction impacts that are planned to be scoped into the assessment. This is not a valid justification given the many variables in the level of flood risk, type of receptors and flood resilience requirements, present between the construction and operation phases of the scheme. For example, the operational phase of the development will need to be assessed and designed to:
  - a 1 in 100yr, plus an allowance for climate change, fluvial flood, and;
  - a 1 in 200yr, plus an allowance for climate change, tidal flood event commensurate with the scheme's life expectancy

The construction phase would not have the same requirement for considering future flood risk.

- Regarding point 2 above, we feel it is important to consider flood risk for the whole lifespan of the scheme, including decommissioning, so that important design decisions can be made, and implemented early on in the scheme's development, where there is more flexibility. Deferring such decisions to a later stage, will limit the number of opportunities to make better flood risk decisions, due to the scheme already being operational and options being restricted. As a minimum, we would support the production of a Decommissioning Environmental Management Plan, which sets out the key principles that would be adhered to for decommissioning.

There are elements linked to fluvial and tidal flood risk that have not been sufficiently considered by the Scoping Report.

There is little acknowledgement within the Scoping Report of the potential impact the scheme could have on main rivers and flood/coastal defence assets, particularly at the possible landfall points; yet it has been stated that the cable route would be passing beneath these in several locations. Any adverse impacts on the main rivers or flood / coastal assets could result in an increase in flood risk to and from the proposed scheme. We would expect this to be scoped into the EIA, and be supported by condition assessments and as-built drawings of any assets, along with a strategy for monitoring any vibration and movement as a result of the scheme. Such information will be essential in determining the depth of the cable crossings beneath the main rivers and assets.

#### Section 1.10.5

States a Flood Risk Assessment (FRA) will be undertaken, which will be included as an appendix to the ES, considering flood risk both to and from the proposed scheme, as well as outlining how this risk will be managed in the context of climate change. With regards to the points raised above, we feel the risk is significant enough to justify inclusion within the EIA itself.

This will ensure flood risk is given the appropriate weighting and allow additional consultation on flood risk matters under the Preliminary Environmental Impact Report (PEIR) consultation.

### Other sources of flooding

In addition to fluvial and tidal flood risk, the proposal may also be at risk from other sources of flooding, which are outside of our remit, so have not been fully considered within our response. However, we would expect particular attention to be given to the surface water (pluvial) flood risk, particularly around Friston substation and converter site, where the risk is high, and the Lead Local Flood Authority have raised concerns regarding possible increases in the volume of surface water run-off. We would recommend that the surface water flood risk associated with the Friston site be considered through all phases of the scheme, factoring in any changes in risk over the lifetime of the scheme, taking climate change into consideration.

### Landfall options

Please note that the Southwold landfall location is low lying and subject to tidal inundation and coastal erosion. It also borders the Buss Creek main river and is adjacent to EA coastal defences.

The whole of the Walberswick landfall location is within Flood Zone 3a (fluvial and tidal), is low lying, and subject to coastal erosion. The Walberswick location borders the Dunwich River and is adjacent to EA coastal defences. It is also worth noting that the Walberswick beach ridge is no longer maintained. The site at Walberswick has flooded on numerous occasions and has been subject to erosion.

## **Flood modelling**

### Legislation, Policy and Guidance

Please also consider the following guidance:

- *Using Modelling for Flood Risk Assessments Guidance (December 2023)*. Available online at: [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments)
- There may be elements within the Environment Agency's *Coastal Standards Technical Report LIT 56561 (2022)* which are of use. Particularly regarding future wave conditions and climate change allowances.

### Section 12.8

States "*It is assumed that the data collated is accurate*". Please be mindful that in the context of flood risk modelling information, it is important to check that it is sufficient for your purposes and meets your requirements in line with guidance.

The detailed models the Environment Agency hold in the vicinity of the scoping boundary are recent, but some use older (UKCP09) climate change allowances and boundary data. Please refer to the guidance on using modelling for Flood Risk Assessments available online for further information: [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments)

### Section 12.7.3

In terms of flood risk models held by the Environment Agency a summary of available modelling datasets is provided below. Detailed hydraulic information can be requested via [enquiries\\_eastanglia@environment-agency.gov.uk](mailto:enquiries_eastanglia@environment-agency.gov.uk)

### Flood models

We have the following information regarding flood models:

- New modelling is currently being undertaken by the Environment Agency for the Minsmere River.
  - This modelling includes the Minsmere River and River Yox, the Middleton tributary (starting at head of main river 640645, 266920), the Theberton Tributary (starting from head of main river at 643380, 265645), and Leiston Drain (outside of the onshore scoping boundary). This work should be completed within the next 6 months. It would be sensible to use the most recent hydraulic modelling of these watercourses. Prior to this model update, the last modelling study for these watercourses was undertaken in 2013 and uses older hydrological methods and survey data. It is recommended that the new modelling information is used once available.
- The Alde, Ore, Fromus modelling, by Mott MacDonald (2020)
  - The Fromus falls outside of the scoping boundary. The model outputs up to and including the 0.1% (1 in 1000) extent for the Fromus also fall outside of the scoping boundary, however, this modelling may be of interest.
- River Blyth by Mott MacDonald (2020)
  - This modelling includes the River Blyth and Thorlington watercourse which crosses the scoping boundary. Climate change allowances used in this study are based on UKCP09 uplifts which have now been superseded by UKCP18.
- Dunwich River by Mott MacDonald (2020)
  - This watercourse was modelled in 2d only at a 5-metre grid resolution using TUFLOW software as part of the River Blyth Study (Mott MacDonald, 2020).
- The River Wand and Uggeshall watercourses
  - These watercourses were modelled in 2d only at a 5-metre grid resolution using TUFLOW software as part of the River Blyth Study (Mott MacDonald, 2020).
- Buss Creek
  - This watercourse was modelled in 2d only at a 5-metre grid resolution using TUFLOW software as part of the River Blyth Study (Mott MacDonald, 2020).
- Wrentham Watercourse by JBA (2020)
  - The Wrentham Watercourse is outside of the scoping boundary although the 0.1% (1 in 1000) Annual Exceedance Probability extent just clips the edge of the scoping boundary.
- Friston River by JBA (2016)
  - The Friston River crosses the southern end of the scoping boundary.
- Hundred River by JBA (2022)
  - The Hundred River crosses the scoping boundary.
- East Anglian Coastal Modelling by JBA (2019)
  - This modelling may be of interest for the Southwold landfall site. Please note this modelling uses UKCP09 sea level allowances, which have now been superseded by UKCP18 data and Coastal Flood Boundary data from 2014, which has since been superseded by the Coastal Flood Boundary (2018) dataset.

### General modelling data

- Table 18-5 Key publicly available data sources for physical process
  - The Surf Zone dataset 2019 may also be of use which is available here. <https://environment.data.gov.uk/dataset/77e6f743-d708-4909-a80f-9510b7dbaa16>
- Table 18-5 Key publicly available data sources for physical process
  - The NCERM (National Coastal Erosion Risk Mapping) may be of interest. This is currently out for consultation for NCERM2, however, the original NCERM data can be found here: [National Coastal Erosion Risk Mapping \(NCERM\) - National \(2018 - 2021\) - data.gov.uk](#)

### Climate change

Although the Scoping Report acknowledges the need to assess future flood risk, we would like to remind the applicant that the proposed scheme is classified as 'Essential Infrastructure' as defined in Annex 3: Flood Vulnerability classification of the [Planning Practice Guidance \(PPG\)](#). Based on the guidance '[Flood Risk Assessment: Climate Change Allowances](#)', the 'higher central' peak river flow allowance should be used to assess future fluvial flood risk for such developments located in Flood Zone 3a. For assessing future tidal flood risk, the minimum benchmark for flood risk mitigation is to design to the 'upper end' climate change allowance for the development's lifetime (including decommissioning, where relevant), based on '[Flood Risk Assessments: Climate Change Allowances](#)'.

### **Marine**

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.2**.

(**Table 1.2** Marine Position Summary)

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Sensitive habitats	Scoped out (not considered)	Should be scoped in (for all phases)
Changes to costal geomorphology	Scoped out	Should be scoped in (for all phases)
Temporary increase in suspended sediments and subsequent deposition	Scoped out	Should be scoped in (for all phases)
Habitat loss and seabed disturbance	Scoped out	Should be scoped in (for all phases)
Decommissioning	Scoped out (not considered for the above issues)	Should be scoped in

### Section 1.10.4



There is no mention of sensitive habitats in relation to the [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK \(www.gov.uk\) guidance](#). There is an expectation that this will be covered in the EIA, as stated in section 1.10.4 of the scoping report.

#### Section 18.6.2 and table 18-4

Currently changes to coastal morphology impact are scoped out of the EIA. We request that they are scoped in for the construction, operation and decommissioning phases.

If a temporary coffer dam or deposits are required, please provide some additional information around duration and scale of these impacts to justify this. The presence of an existing structure should not be used to mitigate the addition of a new feature, even if it is small scale and temporary in nature.

Temporary increases in suspended sediments and subsequent deposition have been scoped out of the construction and operation phases. We are unable to determine whether it will be scoped in for decommissioning. We request that it is scoped in for all phases, as we'd need to see the following information:

- Time of year for scheduled works
- Sampling methodology
- Any planned sediment/water quality monitoring – during and/or post construction phase to ensure chemicals have not been released
- Consideration for the release of nutrients from sediment disturbance resulting in a potential nuisance/harmful plankton bloom, particularly in the inshore area

#### Sections 19.6.2, 19.7.2 and table 19-5

Temporary habitat loss and seabed disturbance, for the receptor of seabed morphology, has been scoped out for the construction and operation phases. We request that it's scoped in for the construction, operation and decommissioning phases.

Section 19.7.2 of the report states that intertidal and subtidal benthic surveys will be carried out for habitat characterisation, and check for the presence of protected/sensitive features. Access to the intertidal area may require impact assessment/mitigation considerations depending on the results of the surveys. Therefore, it is not appropriate to scope out the temporary habitat loss and seabed disturbance, for the receptor of seabed morphology.

A total area of impact needs to be estimated, with all sediment disturbance activity is factored in (trenching technique and sediment plume). According to WFD Assessment guidance [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK \(www.gov.uk\)](#), if the footprint of the activity is greater than 0.5 km<sup>2</sup>, it should be included in the impact assessment. The impacts of smothering on filter-feeding benthic species, and the resuspension of inorganic nutrients with the potential to trigger a nuisance/harmful phytoplankton bloom, should be considered. Other works in the area taking place concurrently could lead to a larger combined impact on the marine environment. Therefore, cumulative impacts from other projects in the nearby area also need to be considered.

Please provide a reference for the statement “*With respect to changes in water clarity, the benchmark used by Natural England for the pressure is a change in one rank e.g., from clear to intermediate, on the Water Framework Directive scale for one year.*”

## Geomorphology

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.3**.

(**Table 1.3** Geomorphology Position Summary)

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Changes to costal geomorphology	Scoped out	Should be scoped in (for all phases)
Temporary increase in suspended sediments and subsequent deposition	Scoped out	Should be scoped in (for all phases)

We would like to re-iterate the general considerations for geomorphology/natural processes that were provided at the pre-app stage:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques, such as Horizontal Directional Drilling (HDD), to minimise the likelihood of cables entering the water environment
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change
- Ensure coastal landfall infrastructure is located outside of areas expected to be impacted by coastal change over the duration of the project
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes
- Consider opportunities to deliver WFD mitigation measures as part of the design
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration

Although most of these considerations appear to have been taken on board (e.g. using HDD/trenchless techniques at landfall and river crossings), it is disappointing that allowance for decommissioning design has been neglected.

### Sections 2.3.109 and 2.3.110

Proposed Landfall states that:

- 2.3.109 - The expected minimum operational life of the proposed Landfall infrastructure is 40 years, with replacement only expected to occur upon the failing of specific assets.
- 2.3.110 - Upon the decommissioning of the proposed Scheme, all above ground assets at the proposed Landfall would be removed to foundation level, and foundations capped. The below ground transition joint bay providing onshore to offshore cable interface may be left in place. As a result, it is expected that there would be similar methods used as

those required to install the asset and decommissioning would be separately assessed at the time. As a result, it is not proposed to assess the impacts of decommissioning as part of the EIA. In any event, it is not anticipated that impacts from decommissioning would present any greater environmental risk than any assessed impacts from the construction phase.

Effectively, the decommissioning phase is proposed to be separately assessed nearer the time of decommissioning. The removal of infrastructure at the end of the lifetime of the project, especially infrastructure installed at landfall, should be assessed now, alongside the construction and decommissioning phases. Simply stating that impacts from decommissioning would not present any greater environmental risk than construction cannot be justified, given the time-period between construction and decommissioning.

To avoid structures/cables/cable ducts being exposed on the foreshore due to coastal erosion, and interfering with coastal processes, these items should be removed, not just capped at ground level. With coastal erosion comes foreshore lowering, and consequently exposure of cables/ducting. This will have an impact on ecological processes and coastal geomorphology.

The development proposal, including its decommissioning phase, should take into account the effects of climate change, in this case in the form of coastal erosion. The [Overarching National Policy Statement for Energy \(EN-1\)](#) states the following under Section 4.10.13:

- *“The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA’s Climate Change Allowances for Flood Risk Assessments or the Welsh Government’s Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.”*

#### Section 9.6.2

States that the potential impacts of coastal stability or erosion are not assessed in Chapter 9, will be addressed in Chapter 18 Marine Physical Processes and a separate technical report on coastal stability. We look forward to reviewing this report as soon as possible.

#### Section 18.3.20

Acknowledges that sediment transport/longshore/littoral drift is locally variable, but states that sediment transport is primarily north to south. Although this is true for Walberswick, south of the mouth of the River Blyth, north of Southwold pier, there are areas of variance. At Kessingland, and Benacre Ness, the main drift direction is to the north. The applicant’s own wave roses (insert 18.2) indicate that the wave climate is bimodal, with largest significant waves from the south.

#### Section 18.3.21

States that:

- *“the Shoreline Management Plan (SMP) strategy is to continue to protect the coast at the proposed Landfall sites (i.e., to hold the line) but to allow natural erosion to continue to the north (i.e., no active intervention) at Covehithe and along the cliff and broads between Kessingland and Southwold. The strategy immediately to the north and south of the landfall sites is managed realignment.”*

This may not reflect the correct policy. The applicant should check the new SMP-Explorer website and make sure that these quoted policies are correct. Hold the Line is the policy for Southwold itself and the Buss Creek, but Walberswick beach ridge is no longer managed realignment.

#### 18.3.32

Suspended Particulate Matter (SPM), rather than Suspended Sediment Concentration (SCC) is being used. Consistent terminology should be used - the most common term is SSC.

#### 18.3.50

United Kingdom Climate Projections (UKCP) 18 does indeed say that average wave height may reduce by 10-20%. However, reduction in wave height means that wave base is shallower, and it is possible that more, smaller waves will have a greater impact on the coast; they will not be subject to breaking as they travel across offshore bars, thereby retaining energy. Higher waves have a deeper wave base and touch bottom/break in deeper waters.

#### Table 18.4

States that changes to coastal morphology during the construction phase have been scoped out. We request that this item is scoped in, for construction, operation and decommissioning phase, as a comprehensive coastal processes assessment will need to be prepared. We look forward to being consulted on this assessment.

It is mentioned that there is a man-made coastal defence structure at the mouth of the river Blythe. This is a training bank to maintain the mouth of the river, not a coastal defence structure. A coffer dam cannot use the presence of an existing structure to justify non-assessment of the impacts of a temporary coffer dam, or temporary sediment deposits, on coastal morphology.

#### Table 18.4

Temporary increase in suspended sediments has been scoped out for the construction and operation phase. Although other projects have found, through modelling, that the sediment plume is short lived and sediments drop out of suspension a short distance from the area of disturbance, the landfall locations in question are situated in areas where there may be former peat and mud/silt deposits. The unintentional disturbance of these sediments could release nutrients/chemicals into the water column, which would have a longer “residence time” within the water column, meaning they don’t settle out as quickly as coarser sediments. Therefore, this item should be scoped in for the construction, operation and decommissioning phases.

### **Groundwater and Contaminated Land**

We have reviewed the scoping report and provide the following comments in relation to the protection of controlled waters. We have paid particular attention to Chapter 9: Geology & Contamination, and Chapter 12: Hydrology, Hydrogeology & Drainage.

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.4**.

(**Table 1.4** Groundwater and Contaminated Land Position Summary)

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Secondary Aquifers - Pollution of groundwater bodies including Principal aquifer, abstractions and SPZ as a result of uncontrolled release of contamination during construction	Scoped Out (not considered)	Should be Scoped in (for construction and decommissioning)

The solid geology beneath the site is the Crag Group, which comprises sands, gravels, silts and clays. The Crag Group bedrock is classified as a Principal Aquifer. The proposed development site is large and is therefore underlain by a variety of superficial deposits, with associated aquifer classifications. Superficial deposits across the site include the following:

- Lowestoft Formation, comprising:
  - Areas of silt and clay (Secondary B)
  - Areas mapped as mapped as sands and gravels (Secondary A)
  - Areas mapped as Diamicton Secondary (Secondary undifferentiated)
- Alluvium deposits (Secondary A)
- Marine Beach deposits (Secondary A)
- Head deposits (Secondary undifferentiated)
- Peat (unproductive)
- Tidal Flat Deposits (unproductive)

Large parts of the development site are within Source Protection Zone (SPZ) 3 (Total Catchment) and a smaller area is within SPZ 2. There are multiple abstractions along the route. The site is therefore of high sensitivity.

We provide further comments in relation to sections 9 and 12 below.

#### Land contamination and pollution prevention

Various previous and current brownfield uses are present within the project boundary, including brickworks, fuel filling stations, the former military airfield at RAF Leiston and three historic landfills. Made Ground is also likely to be present. Avoiding these areas, where possible, will be preferable to installing cabling through or beneath them.

The scoping report has identified that contamination from these potential sources could be mobilised during construction. Leaks and spills during construction are also identified as potential impacts.

As a result, in relation to groundwater, the following have been scoped in for further assessment (table 9.2), prior to control measures being set out in the Construction Code of Practice (CCOP):

- Pollution of groundwater bodies including Principal aquifer, abstractions and SPZ, as a result of uncontrolled release of contamination during construction (e.g. accidental release of fuel or other construction chemicals)
- Temporary alteration of groundwater flows as a result of dewatering/construction activity, causing existing contaminated groundwater to migrate/spread to new areas.

We welcome this, but want to stress that Secondary aquifers should be included in the assessment of potential impacts. Secondary aquifers can support abstractions that must be protected from contamination.

#### Section 9.5.4

Sets out the potential embedded design measures. These include an intrusive ground investigation at the proposed Landfall and Converter Station Sites, with a further phase(s) of ground investigation planned for the proposed Underground Cable Corridor, as the proposed Onshore Scheme design progresses. The methodology proposed for this assessment is in accordance with the [Land Contamination Risk Management guidance](#), which we welcome. It has been identified that it could be an iterative process, with various stages of assessment and/or remediation being required. We welcome this proposed approach.

Potential impacts to groundwater during the operation phase of the development have been scoped out. This is on the basis that any identified contamination that poses a risk will have been appropriately managed during the construction phase. We are satisfied with this approach.

#### Cable installation

Large distances of horizontal directional drilling (HDD) are proposed within the scheme. Potential risk from trenchless crossings to groundwater in the superficial deposits, Principal aquifer, SPZs, private and licensed water abstractions, have therefore been scoped in for further assessment. We welcome this approach.

HDD could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters, particularly in sensitive areas such as near river crossings, close to abstractions and in SPZs. It is anticipated that a hydrogeological risk assessment and water features survey will be required in these vulnerable areas.

Where cables are to be laid in land affected by contamination, waste material will need to be carefully managed.

#### Foundation works risk assessment

If contamination is identified in areas of the development where foundations are proposed, we would expect to see that a foundation works risk assessment is completed. This could be included in the Construction Environment Management Plan (CEMP), along with pollution prevention measures, to ensure the groundwater beneath the site is not impacted by on-site activities.

### **Water Resources**

#### Section 12.3

We understand that data is to be obtained for the PEIR and ES with regards to groundwater, and surface water features, to inform the development's design. Additionally, site investigation and surveys will be undertaken in 2024 to further inform the geological and hydrogeological baseline. We recommend that features are identified with dry year and low flow sensitivity in mind, in addition to water quality and flood risk.

#### Section 12.4

The scoping report identifies the potential for water resources impacts during the construction phase of the project, which include sediment, pollutants and flood risk. Consideration for dry weather and drought conditions are not referenced in the potential impacts. Construction during the summer may take place during periods of prolonged dry weather or drought, when the ecology which depends on flow is most vulnerable. Changes to groundwater and surface water flows (identified in section 12.4.2), from physical modifications or groundwater control operations, which could interrupt natural groundwater flow pathways and groundwater levels, should also extend to drought risk.

No permanent abstractions are proposed as part of the development, and we agree that operational impacts are therefore likely to be minimal.

#### Section 12.5

The report notes that any abstractions required for the works would be temporary in nature (e.g. construction dewatering). Any temporary dewatering activities during construction would be undertaken in accordance with our guidance and, if required, relevant Abstraction Licence and Environmental Permits obtained. Activities would be limited to the depth and time required to facilitate construction activities. See **Informatives** for further information.

The scoping report does not identify sources of water which may be required for:

- On-site potable or domestic use water relating to workforce requirements
- Machine washing or dust suppression (which are commonly required by large projects)

Consumptive abstraction from Groundwater is not available in this area. More details can be found in the [Abstraction Licensing Strategy](#) for the East Suffolk catchment. This would apply to consumptive uses of water which include dust suppression; mineral washing; washing down machinery and potable supply.

In the case of de-watering, if an abstraction can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted. See **Informatives** for further information.

Surface water is available in this area, however it would be constrained by licence conditions which restrict abstraction to periods of high flow. This condition is likely to limit abstraction to the winter months only. The use of water from temporary lagoons, tanks, bunds, silt fences or silt screens as are noted in section 12.5.4, would also be subject to a licence in this way. See **Informatives** for further information.

If water is sought from the water company, the development is within the area supplied by Northumbrian Water Ltd (parent company of Essex and Suffolk Water). Timing (and cost) both

for the water company and the applicant, should be taken into consideration and factored into the project delivery timescales.

We have previously identified in the 2015 Water Framework Directive (WFD) Anglian Region River Basin Management Plan (RBMP), that current levels of water abstraction are causing, or risk causing, environmental damage in various river catchments across East Anglia. Measures have been allocated to the water companies for delivery through the Water Industry National Environment Programme for the period 2020-25. Any surplus in water companies' current Water resource management plan (WRMP), are subject to further consideration of whether it can be taken without causing environmental deterioration.

Given the pressure the underlying Crag and sand aquifer in Suffolk faces, we cannot rule out future further reductions in the supplies available to Northumbrian Water, to prevent deterioration of the water related ecology. Any resultant loss in available supplies will need to be addressed in the company's next WRMP. However, it needs to be noted that replacement supplies are likely to require strategic supply options (for example reservoirs and long-distance transfers), that could have significant delivery times.

We do not anticipate large quantities of supply being required, and the temporary nature of construction phases also reduces these risks. However, in-combination demands with other projects in this area means that early engagement with the water company is advised.

We recommend that a water resources assessment is undertaken, to identify all of the water requirements of the project. It should evaluate options and alternatives for available sources of water.

### **Water Quality**

Overall, the level of detail provided so far for potential mitigation measures is insufficient to provide the Environment Agency with confidence in their efficacy to reduce these risks to an acceptable level.

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.5**.

**(Table 1.5 Water Quality Position Summary)**

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Release of pollutants to surface water - Main Rivers including: River Wang, River Blyth etc...	Scoped out	Should be scoped in (for operation phase)
Release of pollutants to surface water - Larger Ordinary Watercourses	Scoped out	Should be scoped in (for operation phase)
Release of pollutants to surface water - Licensed and private abstractions from	Scoped out	Should be scoped in (for operation phase)



surface water and groundwater		
Release of pollutants to surface water - Consented discharges to surface water or land	Scoped out	Should be scoped in (for operation phase)

We cannot support the operational aspects of the development which have been proposed to be scoped out of further assessment (table 12-7):

- Main Rivers including: River Wang, River Blyth, Wenhaston Watercourse, Dunwich River, Minsmere Old River, Hundred River, Easton Broad, Buss Creek and Fromus (Release of pollutants to surface water)
- Larger Ordinary Watercourses (Release of pollutants to surface water)
- Licensed and private abstractions from surface water and groundwater (Release of pollutants to surface water)
- Consented discharges to surface water or land (Release of pollutants to surface water)

We recommend considering the detailed comments below to help develop clear mitigation measures, which are appropriately secured within the DCO application. We recommend all water quality impacts are treated equally regardless of the size of the watercourse. We also recommend revising the current proposed approach to determining the magnitude of impact on water quality. Although change in WFD classification is an important factor to consider, it should not be the only aspect being assessed.

#### Section 12.3.6

Table 12-1 lists the Environment Agency Hydrology Data Explorer as a source of water quality data. This service is currently in Beta testing, and is currently unable to provide any water quality data within the study area. If water quality data is required to understand the baseline environment, then alternative sources of data will need to be sought.

#### Section 12.3.66

Table 12-3 lists the chemical status for all WFD waterbodies as “*Does not require assessment*”. Chemical status was assessed in 2019 and classified as “*Fail*” for all waterbodies in England. Listing the chemical status as “*does not require assessment*” risks the assumption that chemical status in these waterbodies is not of concern, which would not be the case. We recommend the chemical status of all the waterbodies listed to be considered as “Fail”.

#### Section 12.5.5

This section lists potential control measures to limit the impacts of the development on water quality. As explained above, we do not believe that sufficient information has been provided for these measures to be relied upon to sufficiently reduce the risk to water quality. For example, the third bullet point states “*The Principal Contractor would require its contractors to manage their site activities and working methods to protect the quality of surface water and groundwater resources from other adverse effects*”. It is unclear from this paragraph how the Principal Contractor will achieve this. If this paragraph refers to ensuring that contractors follow best practice, then the relevant guidance which will be followed should be listed. It is also unclear how this control measure will be secured within the DCO application. For instance, if this is to be

achieved via contract management, then we would expect to see this secured within an appropriate mechanism, such as the CCOP.

The CCOP is mentioned in places throughout the scoping report as a mitigation measure that will be relied upon. However, light details have been provided regarding the likely contents of the CCOP. Although we appreciate that the CCOP is unlikely to have begun development at this stage, more detail needs to be provided regarding the likely contents of the document, before we can be satisfied that it will reduce the risks to water quality to an acceptable level. We would encourage the applicant to engage with ourselves during development an Outline Construction Code of Practice (OCCP) and CCOP, to ensure that the level of detail that we expect is being incorporated.

Another key mechanism, which will secure mitigation to reduce the risk the development poses to water quality, is the application for water discharge activity permits. We would like to make the applicant aware that a discharge permit will likely be required to discharge any trade, sewage or dewatering effluent from the development. The discharge of surface water run-off which has the potential to be contaminated, for instance run-off from areas of exposed soil, will also likely require a permit.

The applicant should make it clear which activities will be secured with an environmental permit, before the impacts of those activities are scoped out of the ES. Measures which will be taken to ensure compliance with any permits, can be secured within the OCCP and CCOP, to provide further assurance that effects from these activities will be appropriately managed. We would encourage the applicant to seek our enhanced pre-application permitting advice service at the earliest possible opportunity, to avoid potential issues and delays during the permit application process.

#### Section 12.6

We are not able to support the proposed approach to determining the sensitivity of receptors to water quality impacts. Table 12-7 makes a distinction between Main Rivers, "*large ordinary watercourses*" and "*minor ordinary watercourses*". No definition is provided for these terms, but the table describes minor ordinary watercourses as "*low value watercourses*". Table 12-8 describes watercourses with a higher flow rate as being higher in sensitivity. We are unable to agree that a lower flow rate necessarily equates to a lower value watercourse. Furthermore, the lack of dilution within smaller watercourses, often makes them more sensitive to pollution and increases their likelihood of significant changes in water quality.

#### Section 12.7.14

Table 12-9 outlines the approach to determining the magnitude of impact from effects on the water environment. It states that impacts will be considered "High" if an effect causes a change in WFD classification, and "Medium" if an effect contributes to a change in classification. This approach risks underestimating the magnitude of impact of serious pollutions, and water quality impacts which, due to their location, are unable to cause a change in WFD classification. Conversely, "Low" or "Negligible" impacts could be falsely considered "Medium" impacts, if they have even a small contribution to a WFD classification change, due to other potentially external factors. As a result, we are unable to support the proposed methodology for determining the magnitude of impact on water quality.

## **Biodiversity**

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.6**.

**(Table 1.6 Biodiversity Position Summary)**

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
Direct physical disturbance of surface water features. Direct impacts on WFD quality elements. Increased sediment supply to surface waters. Release of pollutants to surface water - Minor ordinary watercourses and land drainage	Scoped out	Should be scoped in (for all phases)

Sections 1.11.9, 8.7.21 and 13.5.8

We look forward to receiving the baselines data and results for Biodiversity Net Gain (BNG).

The PPG provides guidance on the application of net gain. The Chartered Institute of Ecology and Environmental Management (CIEEM), together with the Construction Industry Research and Information Association (CIRIA) and the Institute of Environmental Management and Assessment (IEMA), have published guidance on how to deliver net gain in practice. These can be downloaded [here](#).

This project will be sharing infrastructure with Sea Link, EA1N, EA2 and Nautilus Interconnector. It would therefore be best practice to consider how BNG can be coordinated with these projects, and in accordance with Suffolk’s Local Nature Recovery Strategy.

Table 12.7

Minor ordinary watercourse and drainage have been scoped out, with a reference to construction control measures, and that these watercourses are of “low value”. With BNG, although drains carry a lower multiplier than ordinary or main river watercourses, they still have a value. Even a drainage ditch can have a viable ecosystem and provide a valuable habitat and wildlife corridor. A WFD waterbody status is calculated based on the main and minor watercourses that constitute it. Actions should therefore be taken to ensure a minor watercourse’s ecosystem doesn’t deteriorate, which in-turn would cause a deterioration to a WFD waterbody’s overall status. We request that the effects from the construction, operational and decommissioning phases on minor ordinary watercourses and drainage should be scoped in.

Table 13.3

Indicates that consideration of visual impact of lighting for any above ground structures/construction compounds/operational activities has been scoped in. We are pleased to see this, and look forward to being consulted on any plans regarding the lighting near watercourses.

## Fisheries

To provide clarity on issues which have been scoped out and our position, we have provided **Table 1.7**.

(**Table 1.7** Fisheries Position Summary)

<b>Issue</b>	<b>Developer position Scoped in/out</b>	<b>EA position</b>
The Alde and Ore Waterbody (Smelt)	Scoped out (not considered)	Should be scoped in (for all phases)
Protected or notable species, all species: - Temperature increase due to the presence of operational cables - Permanent habitat loss/seabed disturbance - Temporary increase and deposition of suspended sediments - Underwater noise changes...(including transboundary)	Scoped out	Should be scoped in (for all phases)

### Section 12.3.2, Table 12-7 and Table 20-1

The Alde and Ore Waterbody has not been included in the assessment of potential impacts. Therefore, migratory fish species, who travel through the Alde and Ore waterbody, have not been included in the assessment, and may be impacted by the project.

The Alde & Ore is a WFD surveillance waterbody and has a breeding population of smelt present. Smelt are a species who migrate to sea from the Alde & Ore as adults to feed and return to the estuary to spawn. The Environment Agency has a statutory duty to ensure the conservation of smelt and their aquatic environment under the Environment Act 1995. Smelt are listed as a biodiversity action plan (BAP) species and are a key indicator species under the Water Framework Directive (WFD).

We require the Alde & Ore waterbody to be included in the assessment of impacts, and the disturbance effects on Smelt species. This should include potential thermal plume avoidance from cables. Smelt are very sensitive to anthropogenic disturbance, and are therefore at risk of being impacted by this project.

We note that EA Transitional and Coastal Waters (TraC) Fish Monitoring Program is scoped in, yet Smelt and potential impacts to them, have not been included in the report. WFD Assessment should also include the potential for a TraC fish deterioration in the Alde & Ore. Migratory species need to be included in an assessment of the project's potential impacts.

### Section 20.2.3

We have not been included in the consultation list for the EIA process. We are the responsible authority for Water Framework Directive compliance, and for the protection of migratory species to 6 nautical miles offshore. We therefore need to be included in the EIA consultation list.

#### Section 20.3.46

Eels are protected under the Eels (England and Wales) Regulations 2009. These regulations are not considered in the report; we therefore feel that impacts on eels have not been considered adequately. We request that potential impacts to eels are scoped in, and consideration of the Eels (England and Wales) Regulations 2009 are demonstrated.

#### Section 20.3.49.51 and Table 20-6

Smelt have been mentioned in this section, but the description does not include information that smelt will be migrating along the coast and through the project corridor. Impacts to smelt, undertaking seasonal migration along the coast, have therefore not been scoped in or assessed. We request that potential impacts on smelt migration are scoped in, and included in assessment of projects impacts.

#### Table 20-7

Smelt and eel are not included in the protected species table. We need smelt and eel included in this table, to ensure impacts on these migratory species are adequately assessed.

#### Table 20-8

Diadromous and Catadromous fish have not been mentioned in the table. We need these types of fish to be mentioned specifically, so that we are confident impacts to them will be assessed.

#### Section 20.7

The Environment Agency WFD Transitional and Coastal Waters (TraC) Fish Monitoring Program has not been included. There are potential impacts to migratory species which form part of the WFD fish assemblages in the impact zone, and impacts to migratory species not included. The TraC Fish Monitoring data needs to be included, to help determine the impacts to migratory species.

### **Informatives**

#### Abstraction, discharges and dewatering

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. More information can be found here [Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK](https://www.gov.uk/guidance/temporary-dewatering-from-excavations-to-surface-water-rps-261) ([www.gov.uk](https://www.gov.uk))

Since 01 January 2018, most cases of new planned dewatering operations above 20 cubic meters a day will require a water abstraction license from the agency, prior to the commencement of dewatering activities at the site, if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017](https://www.gov.uk/guidance/the-water-abstraction-and-impounding-exemptions-regulations-2017) Section 5: Small scale

*dewatering in the course of building or engineering works.* A subsequent discharge may require a permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If they don't meet the exemption and require a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#)

Please note that the typical timescale to process a licence application is 9-12 months. We suggest talking to our National Permitting Service early in the project planning.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here [Discharges to surface water and groundwater: environmental permits - GOV.UK \(www.gov.uk\)](#)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

[Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

### Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

It would be helpful to understand whether or not the developer is proposing to disapply the Environmental Permitting Regulations (EPR) for Flood Risk Activity Permits (FRAPs). We would recommend early engagement of this matter.

### Waste

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes. The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly, and only given to businesses authorised to take it. The code of practice can be found here

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/506917/waste-duty-care-code-practice-2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf)

If you need to register as a carrier of waste, please follow the instructions here

<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply. Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy
- we have produced guidance on the recovery test which can be viewed at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity>.

You can find more information on the Waste Framework Directive here

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive>

More information on the definition of waste can be found here

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here <https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests>

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in [Regulation \(EU\) 2016/1628](#) (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority (LPA).

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO<sub>x</sub>), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority, which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation, this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application, to which this then can be applied.

#### Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to our:

- position statement on the Definition of Waste: Development Industry Code of Practice
- website at <https://www.gov.uk/government/organisations/environment-agency> for further guidance



#### Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

#### **Further Advice**

We would welcome the opportunity to further engage and advise on the matters outlined above, in order to provide you with confidence and clarity in relation to our position on the DCO proposals, prior to formal submission and outside the statutory engagement process.

This would fall within the scope of our Cost Recoverable Planning Advice service, and as such would be subject to a fee of £100 per staff hour of time. We understand that you have engaged this service already, and would recommend that you approach us for further advice.

Yours sincerely

**Mr Morgan Haringman**  
**Planning Specialist**

Direct e-mail [NITeam@environment-agency.gov.uk](mailto:NITeam@environment-agency.gov.uk)

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**From:** Claire Wilkinson - Principal Planning Officer National Infrastructure  
[REDACTED]  
**Sent:** 02 April 2024 12:14  
**To:** Lionlink Interconnector  
**Subject:** N020033 - LionLink - EIA Scoping Notification and Consultation - ECC Comments  
**Attachments:** LION - Statutory Consultation Letter.pdf

You don't often get email from [REDACTED]

Dear Sir/Madam,

Thank you for consulting ECC in response to the EIA Scoping notification and consultation. I can confirm that I am the key contact at Essex County Council as the consultation body for LionLink (the Proposed Development) by the Applicant 'National Grid LionLink Ltd'.

The Applicant has submitted an EIA Scoping Report to support a request for a Scoping Opinion in respect of the LionLink Scheme (the Project). The scheme consists of a 1.8GW Multipurpose interconnector (MPI) which will provide a new electricity link between Great Britain and the Netherlands and connect to Dutch offshore wind turbines.

The options presented lay within Suffolk County, of which Essex County is a direct neighbour. Having reviewed the proposals, we note that there would be no direct impact as a consequence of the proposed development, as the proposals would sit away from the Essex County boundary.

However, having reviewed the proposals, we consider that there could be residual impacts from the development during construction and operation and we believe that these principally relate to employment, education and skills, procurement and highways impact. Therefore, we request that this information should be considered and provided in the Environmental Statement.

ECC is aware that there are numerous energy NSIPS within Suffolk and the effect of the cumulative impact of multiple developments on Essex must be considered. NGLLL must ensure that there is the fullest possible coordination and co-location of LionLink's onshore cable corridor and infrastructure with those of the emerging proposals, for example the SEALink project in order to minimise the combined impacts spatially and by aligning their timing and development across National Grid's two divisions.

Thank you for taking the time to review our comments and we look forward to further discussions with NGLLL in the future.

Kind regards

**Claire Wilkinson**  
**BA (Hons), PGDip TP, MRTPI**

Principal Planning Officer – National Strategic Infrastructure Projects  
Planning and Sustainable Development

 **Essex County Council**

*Please note that I work part time and my normal working hours are all day Tuesday, Wednesday, Thursday and Friday mornings.*

## Feekins-Bate, Laura

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**From:** Squire, Sandra [REDACTED]  
**Sent:** 03 April 2024 15:19  
**To:** Lionlink Interconnector  
**Subject:** EN020033 - Lionlink Interconnector Scoping Consultation

You don't often get email from [REDACTED]

Thank you for consulting the Forestry Commission on this proposal.

As the Governments forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as ancient\semi natural Woodland as well as other woodland.

We are particularly concerned about any impact on ancient semi natural woodland and will expect to see careful consideration of any impact and any weightings which might be applied to any assessments of route options.

We note there are numerous Ancient Semi Natural woodlands within the corridor of the scoping boundary and adjacent to it. Including Big/Common Wood, Hinton Long Spring Wood, Hollyhills wood and Buckles Wood. With the Reydon wood adjacent to the corridor. Natural England hold the Ancient Woodland Inventory, although it does not necessarily provide a complete picture of ancient woodland and is in the process of being updated.

Theberton Wood may also be considered an Ancient Woodland, although is not included in the Inventory, it is critical this wood is assessed to prevent any loss or deterioration. We would recommend consultation with Forestry England as the land manager and Natural England regarding potential inclusion onto the Inventory.

Ancient Woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is essential that any ancient woodland identified is considered appropriately to avoid the above impacts.

As highlighted in Paragraph 180 (c) of the National Planning Policy Framework, which states: "*Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*".

While Nationally Significant Infrastructure Projects are not subject to the NPPF, it sets out the importance of these habitats.

Buffer zones should be provided to protect trees from any potential impacts of the development. For ancient woodlands, you should have a buffer zone of **at least** 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. These zones should contribute to wider ecological networks and could include further tree planting or a mosaic of semi-natural habitats.

We note as reported in the EIA Scoping Report the plan for a 50m buffer where possible for Ancient Woodland, which will certainly reduce any potential effect of the proposal on the Ancient Woodlands.

We also note there are numerous other fragmented woodlands within the proposed corridor. Many of these are mixed deciduous woodlands on the Priority Habitat Inventory (England). This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the UK Post-2010 Biodiversity Framework but this priority status remains.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities you must take into consideration the Root Protection Zone. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).

The UK Forestry Standard (UKFS) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements. The UKFS has a general presumption against deforestation. Page 23 of the Standard states that: "Areas of woodland are material considerations in the planning process...."

It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change. Woodland also provides habitat for a range of Section 41 Priority Species including all bats.

With the Government aspirations to plant 30,000 ha of woodland per year across the UK by 2025. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered.
- Woodlands need to be climate and pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)

- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

We would expect to see hedgerows, individual trees and woodlands within a development site considered in terms of their overall connectivity between woodlands affected by the development. There is in particular the opportunity to connect some of the fragmented woodlands within the site to maximise connectivity and benefit biodiversity.

I hope these comments have been useful to you, if you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

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**National Grid Interconnector Holdings Limited**  
**LionLink Multi-Purpose Interconnector project**  
**Scoping Report submitted to the Secretary of State on 6<sup>th</sup> March 2024**

**Comments by Friston Parish Council**  
**4<sup>th</sup> April 2024**

**Introduction**

1. The LionLink project is one of three projects being promoted by the National Grid Group to make connections at the proposed NG connection hub<sup>1</sup> in Friston, which in itself was an NSIP included within the DCO Applications made by Scottish Power Renewables (SPR) for the East Anglia One North (EA1N) and East Anglia Two (EA2) projects. These DCOs were granted on 31<sup>st</sup> March 2022 but are currently being challenged through the courts.
2. Following the Examination of the EA1N, EA2 and the NG connection hub NSIP, the Examining Authority (ExA) issued its Recommendation Reports on 6 October 2021, one report for each of EA1N and EA2 with the NG connection hub included in each report. References in this document to the ExA report will be to the EA1N report as the reports are identical in all materials respects.
3. It should be noted that during the course of the examinations SPR (presumably on the instructions of National Grid) sought to deny there was any certainty about the prospect of two or more other energy projects connecting at Friston despite the fact that both Nautilus and LionLink had connection offers there and Sea Link (which did not need a connection offer as it is an NGET project) which was proposed to connect there. Further NG largely absented itself from the Examination process despite one of the projects being examined being its own, namely the National Grid connection hub.
4. In Volume 2 of the ExA Report, Chapter 28, “Conclusions on the Case for Development Consent” on page 274, it states at paragraph 28.4.5:-
5. ***“the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are **so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location.**”***
6. Paragraph 28.4.6 goes on to say:-  
*“In relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution) to landscape and visual impacts and to impacts on the historic built environment, should these arise from additional development proposals in the future.”*

[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-009800-EA1N-Recommendation%20Report-Vol2\\_Ch18-31%20COMPLETED.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-009800-EA1N-Recommendation%20Report-Vol2_Ch18-31%20COMPLETED.pdf)

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<sup>1</sup> Although the proposed National Grid development at Friston is described as a “substation” in reality, and as evidenced by the multiplicity of projects proposed to connect there and the multiple components of this “substation”, it is more accurately described as a “connection hub” or “connection node” a term which National Grid has itself employed when referring to connection infrastructure proposed to connect three projects in Essex.

## **Friston Parish Council's Position**

7. Friston Parish Council (FPC) opposes the onshore elements of the LionLink, Sea Link and Nautilus projects in East Suffolk. It should be noted that these projects do not generate any renewable energy. Further they do not improve energy security for the United Kingdom<sup>2</sup> or reduce prices for consumers. However without prejudice to this position of opposition, FPC has the following comments on the Scoping Report. Please note that FPC has not had the benefit of expert planning law advice or the advice of relevant technical experts. Accordingly FPC reserves the right should these projects proceed to examination to raise issues in relation to the environmental impacts of these projects which have not been referred to in this report, including without limitation where FPC has misunderstood or not appreciated the potential environmental impacts of the LionLink project. Further FPC relies on its members providing their time voluntarily to consider these projects, a situation which has not been helped by the limited time available to consider the Scoping Report.

## **The LionLink project**

8. It is clear from the LionLink Scoping Report that NG has not considered these substantial adverse effects at Friston and in fact is not giving any consideration to them at all.
9. The LionLink Scoping Report shows a disturbing lack of familiarity with the key determinations set out in the ExA Report. There are notable omissions from this Report, including a complete lack of a plan or any visual information on the connection hub site at Friston contrary to the EIA Regulations. To rely on a short written description of the infrastructure that LionLink proposes to add to the Friston connection hub without acknowledging or demonstrating how the LionLink infrastructure relates to the proposals already made by Scottish Power Renewables (SPR) EA1N & EA2 and Sea Link,(all of which are further advanced in the planning process) is unacceptable.
- 10. The scoping boundary as set out in the onshore figures is incorrect as it bisects the village of Friston. It is illogical only to consider the environmental impacts on half of the village. The scoping boundary should be extended further south/south-west so that the entirety of the village is included.**
11. LionLink has not followed PINS Advice Note 17 which provides for a staged and sequential approach to cumulative effects assessment. In that document Stages 1 and 2 should be undertaken before requesting a Scoping Opinion. Stages 1 and 2 comprise a "long list" and a "short list " of other developments which may have an interaction with the project. These two lists are completely absent from the Scoping Report despite multiple other NSIPs being proposed for the region. NGET's Sea Link project included Sizewell C, SPR, Nautilus, Eurolink (now LionLink) and East Anglia Green in their Scoping Report of November 2022.
12. In FPC's opinion LionLink's Scoping Report is incomplete and these omissions need to be remedied before a scoping opinion can be given.

## **Projects being promoted by National Grid Group**

13. NG held a Statutory Consultation for its Sea Link project in autumn 2022 and simultaneously submitted its Scoping Report to the Secretary of State, to which FPC responded on 22<sup>nd</sup> November 2022. Sea

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<sup>2</sup> An improvement to energy security does not bear examination since these interconnectors do not generate electricity therefore the UK would be dependent on other countries providing energy which is unlikely in circumstances where energy supply is limited. See also comment on policy below.

Link is proposed to connect at the Friston NG connection hub and an NSIP Application to the Planning Inspectorate is expected in the autumn of 2024 or early 2025.

14. A non-Statutory Consultation was held for the NG Nautilus project to connect at Friston in October 2021. No Scoping Report for this project has yet been submitted but there were meetings held at the Planning Inspectorate in June 2022 to discuss onshore co-ordination of these projects. FPC notes the intention in this Meeting Note for Sea Link, Nautilus and Eurolink (now LionLink) to connect to the proposed NG connection hub at Friston.

[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020026/EN020026-Advice-00005-1-220620%20SEA%20Link%20Nautilus%20Interconnector%20project%20update%20meeting%20note%20\(Final\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020026/EN020026-Advice-00005-1-220620%20SEA%20Link%20Nautilus%20Interconnector%20project%20update%20meeting%20note%20(Final).pdf)

15. NG LionLink also held its Non- Statutory Consultation concurrently with Sea Link in the autumn of 2022 and has now submitted its Scoping Report. Its Statutory Consultation is expected early in 2025 with an NSIP application being made late 2025 into 2026. However the Scoping Report refers to the scheme commencing in 2026 with a 4 year construction period.
16. East Anglia Green, now known as Norwich to Tilbury, submitted its Scoping Report in November 2022 and is anticipated to make a DCO Application in Quarter 3 2024. This is National Grid's controversial plan for pylons from Norwich to Tilbury, which has implications for East Suffolk – see following paragraph.
17. Meanwhile National Grid ESO has very recently published its East Anglia Study which raises the prospect of more onshore infrastructure at Friston, such as an additional pylon line. Further it and contemplates Sea Link 2 ( sometimes known as SCD3). Other interconnectors such as Tarchon are also a possibility.
18. All these NSIPs are placing an overwhelming burden on the local community, not only due to the serious impacts of the development on the quality of life of residents, but also on the sheer amount of documents and processes to which a response is needed from the local community.
19. The Planning Inspectorate made the following comment on 20 June 2022:  
  
*“The Inspectorate responded that considering the amount of consultation in the East Anglia region, the Applicant should be aware of what procedures can be taken forward in a combined manner to minimise resourcing pressures. Also, ensuring that parties understand the differences between projects, as well as the timelines between them is crucial for a successful consultation”.*
20. National Grid has made no attempt to follow this advice from PINs. As can be seen from the projects referred to above, National Grid is pursuing a separate application process for each of its projects with the prospect of more to come. This is exacerbating an already unfair process, given the mismatch in resources between developers and the community, and is oppressive. It is as if National Grid is deliberately pursuing an application strategy designed to wear down the community and further damage its mental well-being.

### **Site selection**

21. No alternative site selection has taken place with regard to the Friston connection hub site contrary to policy.



## Scheme Description

22. As stated previously there is no visual representation or plan of the infrastructure proposed for the project at Friston. The figures provide no assistance. Two different scenarios for building out the project are briefly summarised in the text, but it is impossible to determine the different impacts these options would have on the landscape or the practical issues posed regarding overall landtake, drainage, ponds, mitigation planting etc. Both options require an extension of the boundary of the site, one requires relocation of the access road.
23. Further it should be noted that the proposals for the National Grid connection hub at Friston are different for each of the SPR and Sea Link developments. As a result the substance of the infrastructure required for the National Grid connection hub is very confused.
24. Under the second scenario the permanent footprint is stated to be up to 3 hectares yet the consent for the National Grid connection hub (included in the EA1N and EA2 DCOs) states that the footprint (for a GIS substation) will not exceed 1.68 hectares. Given this connection hub can accommodate EA1N, EA2 and Nautilus this increase in landtake is disproportionate. Given the absence of a proper plan it is unclear whether that amount of land is available, not least as no account has been taken of the land required for potential mitigation. The scheme description is inadequate and confused so far as the National Grid connection hub at Friston is concerned..
25. Also under the second scenario the project is said to require an additional 8 associated buildings of up to 5M each, but no further details are offered on type or location. Similarly this option would require a new permanent access road, but again no plan is provided to show its location.
26. There is no option given for Sea Link to construct the connection hub first although that project is further ahead in the planning process. If that were to take place, then a different and far more complicated scenario would arise with overwhelming impacts. **The development of all energy projects at Friston should be examined as one integrated project to allow for all impacts to be properly addressed and assessed.**
27. FPC is aware that gas Insulated substations use SF6 gases (greenhouse gasses) and that currently there is no completely “clean” alternative. No mention is made anywhere in the Scoping Report of this issue, which is of great concern to FPC.
28. FPC is also concerned about the location of the converter station on the outskirts of Saxmundham. This area is crossed by Public Rights of Way which link Friston directly to Saxmundham, and which are most likely lost to the development. LionLink proposes 5 main buildings, of which two will be up to 26M high with a control building of up to 15M high. The proposed land-take is 6 hectares, which it is assumed is for the LionLink project only. The proposal however is for there to be a total of 3 converter stations on the site which would therefore require 18 hectares (44.5 acres). This would be equivalent to 30 football pitches. The site is on elevated land and with the buildings 26M high, and they are likely to be seen over a wide area. It is therefore essential that proper plans and visualisations from multiple and distant locations are provided, along with proposals for landscaping and the re-location of PRoWs
29. The HVAC cables linking the three converter stations to the Friston connection hub require 26 ducts in 6 trenches with a working width of 112M. The sequence of construction for the projects is uncertain but it cannot be said that the effects of this will be temporary or insignificant. The installation of the cables will inevitably involve the removal of trees and hedgerows across this wide swathe of land.

30. The project also involves the installation of up to 8 permanent link pillars of 1.3M high along the route of each cable. This will leave a permanent industrial mark on the landscape and must be taken into consideration.
31. The Sea Link project also involves bringing DC cables from its landfall at Aldeburgh to the converter station at Saxmundham. This will create yet more disruption to land north of the Friston connection hub.
32. The description of the construction of the Friston connection hub requires earthworks for re-profiling of the land to accommodate the connection hub. This is a permanent effect and should not be limited to the temporary effects of construction.
33. The operation and maintenance of the Friston connection hub is said to involve one or two persons per week on a regular basis, but that 5-10 persons would be necessary on site for two months every 5 years. However the Report does not consider the cumulative effect of the operation and maintenance of all projects including EA1N, EA2, Sea Link and Nautilus and their converter stations. Therefore the effect cannot be considered as Negligible.

## **Policy**

### **Cumulative Impact**

34. A fundamental feature of this development is that it is one of a large number of energy projects in the same small rural area. Such an approach is unprecedented and is placing an unreasonable burden on a small rural community and its environment.
35. Further National Grid has not sought consent for its connection hub but rather for a “substation” as an incidental part of other developments. This was the approach adopted for Scottish Power’s EA1N and EA2 projects despite the fact it was known that the so-called “substation” was to be a connection hub, connection offers having been made for LionLink (then called Eurolink) and Nautilus and Sea Link (then called SCD1) being proposed. The legitimacy of such an approach should be questioned.
36. Therefore it is either inexplicable (or perhaps telling) that National Grid has not referred to cumulative impacts at all in the policy section of its scoping report. The only reference appears to be buried at the end of Appendix 4B where there is a reference to Schedule 4 paragraph 5(e) of the Environmental Impact Assessment (EIA) Regulations. This states that there should be:

*“A description of the likely significant effects of the development on the environment resulting from....*

*(e)the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;”*

37. Further National Grid has ignored the numerous references to assessing cumulative impact in EN-1 and other policy statements.
38. This indicates that National Grid has not given sufficient thought or emphasis to cumulative effects despite the comments of the ExA in the EA1N and EA2 examinations as referred to above. This must be corrected.

## Energy Security

39. In its commentary on EN1 National Grid states “Paragraphs 3.3.32 to 3.3.33 focus on the role that interconnectors play in facilitating a secure, low carbon electricity system at low cost and recognises that there are benefits of increasing levels of interconnection.” National Grid then refers to Paragraph 3.3.34 to confirm that setting out this extract:

*“Interconnection provides access to a diverse pool of generation, enabling the import of cheaper electricity, while also providing a route for electricity export. Interconnectors provide the system with additional flexibility, reducing the curtailment of renewable energy, and can also provide a range of ancillary services, such as voltage and black start services.”*

It should be noted that there is in fact no reference to energy security in this extract as one of the benefits of interconnectors.

## Air Quality

40. The Report states that the Friston connection hub is located approximately **500M** from the closest human receptor. This is completely untrue. The relevant OS map shows Little Moor Farm (Listed Grade II) to be **250M** from the connection hub. There will also be human receptors on the many close by public rights of way in the area. Statements like this render the Scoping Report unreliable and must be challenged. With regard to air quality it is essential that all aspects of Traffic and Transport relating to the multiple projects in the area are properly cumulatively assessed.

## Agriculture and Soils

41. The Friston connection hub site is on Grade 2 and Grade 3a Agricultural Land. The creation of a large energy hub at this location leads to permanent loss of Best and Most Versatile agricultural land. The loss of agricultural land at Friston is proposed to be scoped out of the EIA and this is unacceptable as the loss is of significance. The Scoping Report has assessed Grade 2 and 3a land as of medium value/sensitivity and deserves proper consideration.
42. Figure 7.2 shows the Friston connection hub site to be of a soil type described as “*Imperfectly or poorly drained, fine loamy and clayey over clay*”. The note on Figure 7.2 confirms the likely Agricultural Land Classification as Grade 2/3a. As has been shown during the EA1N and EA2 examinations this soil structure has a very significant adverse impact on drainage and flooding in the area. The infiltration tests undertaken in 2021 by SPR were inconclusive and are yet to be repeated.
43. The above facts support the high value of the agricultural land to the north of Friston and demonstrate the unsuitability of the area for industrial development such as LionLink and the National Grid connection hub with the proposed multiplicity of projects.

## Ecology and Biodiversity

44. FPC notes that Grove Wood is classified as irreplaceable habitat and there should be a buffer of at least 15M or preferably 50M between this woodland and the development. In the absence of any plan, this cannot be ascertained. This woodland and the connection hub site itself have roosting bats, badgers, hares and a wide variety of birdlife, including skylarks which are ground nesting birds. FPC notes that hares and hedgehogs, which are found widely in the area, are Species of Principal Importance.

## **Health and Wellbeing**

45. FPC is pleased that LionLink has taken note from its consultation of the concerns of residents over their quality of life and mental and physical health. The fatigue and stress on the community related to repeated consultations and other aspects of the DCOs from multiple energy projects over the past 6 years cannot be understated. This is before any construction has started and the cumulative effects of the construction of multiple energy projects in conjunction with the building of Sizewell C is widely felt as unbearable. People feel trapped and unable to relocate due to loss of value in their properties and the reduced ability to sell. All these matters must be properly considered and full compensation received for every resident of Friston.
46. Other worries relate to the danger of the connection hub catching fire and the use of SF6 gasses which must also receive proper consideration and also cumulatively with other projects.
47. Air quality, noise, visual amenity and lighting would also impact on wellbeing and quality of life. As will the closure of PRowS which affect severance of communities, exercise and access to green space. These matters must be fully scoped in.
48. FPC asks for direct engagement with NG over the progress of this project and that such consultation is not limited to Suffolk County Council and East Suffolk Council.

## **Historic Environment**

49. The Report states that the Suffolk Historic Environment Record shows no heritage assets recorded at the proposed Friston connection hub Site. However Footpath 6 (known as the Pilgrim's Way) is an ancient route which runs directly north from opposite Friston Church, and is a non-designated Heritage Asset which should be properly considered as it will be lost in perpetuity by the building of the connection hub.
50. In the absence of a plan for the proposed Friston connection hub Site, it is not possible to see the relationship with the six Listed Buildings closely surrounding the site. The setting of these Listed Buildings must be considered as they are material decision-making factors. The ExA's Report of the SPR examinations makes the following comment in relation to Little Moor Farm: "*The ExA consider the harm in a range of low-medium-high within less than substantial harm, high harm would be caused*"
51. The Church of St Mary is located very close to the southern boundary of the connection hub site. It is Listed Grade 2\* and there is a War Memorial which is separately Listed within the Churchyard.
52. Friston post mill is located within the village and is "*judged to be one of the foremost remaining post mills in the world*" – Historic England. Impacts, including the setting, on this grade II\* listed structure must be assessed. The Mill is known to be the tallest Post Mill in the UK at 15.4M and is a prominent landmark in the area. By comparison the proposed Friston substation is described as 16M high and the converter stations 27M high.

## **Hydrology, Hydrogeology and Drainage**

53. This topic is of extreme concern to the village of Friston, which already has a history of flooding, particularly surface water flooding. LionLink's Report has acknowledged this flooding but describes it as "anecdotal". This is far from the case as there is much evidence of flooding, including photographic evidence for a number of years and a report commissioned by SCC "The Friston Surface Water Management Plan (BMT)" published in May 2020.

54. NG have not included a map showing surface water flood risk in Friston (although a fluvial flood map is included), despite this being readily available on the Environment Agency website. This map shows a high risk of surface water flooding on parts of the proposed Friston connection hub site. FPC do however note that Table 12-A-1 from the Appendices shows Friston connection hub Flood Risk Baseline as HIGH for Surface Water flooding. The surface water flood map for Friston, including the connection hub site, must be included in the EIA.
55. Rainfall in recent years has become more intense and flood events in Friston have become more frequent. There have been numerous flood events this winter of which records have been made. This can be expected to continue into the future due to climate change. The rainfall data supplied by NG in the Scoping Report only covers the period 1991 to 2020 and is taken from Lowestoft, Scole and Levington, none of which locations are close to Friston. Rainfall levels can vary significantly between local areas. Proper verified records of rainfall and flooding in Friston itself should form part of the preparation for the EIA and be scrutinised.
56. The Scoping Report is wrong in its statement that *“The Friston Substation Site is not located within a delineated river or transitional water body catchment. It is approximately 400M from the nearest water body catchment, which is the Hundred River water body catchment.”* The authors of this Scoping Report appear to have missed the fact that the watercourse through Friston is designated as a Main River by the Environment Agency and has its own catchment area. This watercourse is not named in the Scoping Report’s list of Surface Water Bodies and Watercourses listed on Tables 12.3 and 12.4, which is a grave omission and needs to be rectified.
57. The Friston Watercourse has its own catchment area which includes the connection hub Site. This is very pertinent to the flood risk in Friston and NG must rectify this.
58. FPC do not accept the Scoping Report’s submission that *“The surface water flooding issues at Friston are not considered to impact the feasibility of using the proposed location for the substation”*. This is entirely unproven.
59. There are further errors in Table 12.7 (Scope of Assessment) including the omission of the Friston watercourse as a Main River and the conclusion that there are no receptors within the study area of the Friston connection hub. Effectively the Friston Watercourse has been scoped out of assessment which is unacceptable. Minor ordinary watercourses are also scoped out, which they should not be as there are several drainage ditches across the connection hub site which are intrinsic to the drainage of the area. All watercourses in Friston must be scoped in.
60. Paragraph 12.7.30 states that *“The FRA will need to demonstrate the application of the Sequential Test. It is assumed that the proposed Onshore Scheme would be classed as ‘essential infrastructure under the vulnerability classification ..... It is expected that the FRA will also need to satisfy the Exception Test”*. The policy basis for this statement is unclear and needs to be justified.
61. In Table 12-9 ‘Magnitude of impact,’ High, Medium and Low Flood Risk is defined as *“In the absence of modelling this will be assigned based on engineering judgement, applying a precautionary principle”*. It is totally unsatisfactory to leave such an important impact to a matter of judgement by the developer. There must be clear evidence on such an important topic given the impact of flooding at Friston is high requiring the greatest care in assessment. The ExA in the SPR DCOs having found Friston had a high flood risk made the following comment:

***“the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution) to landscape and visual impacts and to impacts on the historic environment, should these arise from additional development proposals in the future.”***

62. The LionLink Scoping Report is not following this advice in leaving flooding impacts to a matter of judgement.

### **Landscape and Visual**

63. There is little information in this chapter and in the absence of any plans or visual information about the connection hub and converter station sites, FPC reserves its position until these are provided.
64. Of particular concern to FPC will be the assumed growth rate of new planting and the length of the maintenance and replacement period. In this area, trees are very difficult to establish and have slow growth rates in large part due to increasingly very dry summers and increasingly wet winters.

### **Noise and Vibration**

65. Paragraph 14.3.14 states *“The Noise and Vibration chapter within the PEI Report and ES will consider changes in the sound environment that would exist in the absence of the proposed Onshore Scheme. The future baseline will also take into account any developments that are likely to be present in the future baseline.*
66. Paragraph 14.3.15 goes on to say *“The future baseline of the proposed Onshore Scheme has the potential to change as a result of the construction and operation of nearby local developments. The noise and vibration assessment will use a future baseline of 2028 to align with the future baseline traffic year.*
67. The background sound level in Friston, and in particular the connection hub site, is very low as to be indiscernible to normal sound monitors. The agreed maximum sound limit for the connection hub site in the SPR DCOs is 31 DB and there should be no reason for the cumulative sound level of all proposed development to exceed this. FPC considers noise creep to be totally unacceptable.
68. Any temporary increase in noise due to traffic or construction of other projects cannot be taken into account when assessing background noise. For example there is a reference to the railway line which runs between Saxmundham in the west to Leiston in the east. This line is currently unused and will only be used for the purposes of the construction of Sizewell C whereupon it is understood such use will cease therefore it should form no part of the baseline.

### **Traffic and Transport**

69. FPC is extremely concerned about the cumulative increase in traffic due to the numerous energy projects proposed in the area. This is a rural area with a network of small narrow lanes. It is vital that a proper cumulative assessment of traffic including all other projects is carried out given the likelihood of overlapping construction periods
70. Paragraph 15.3.7 names road links, key junctions and walking/cycling routes within the vicinity of the Onshore Scoping Boundary. One of the road links listed is Grove Road which is a two-way single track road, which is designated as a Quiet Lane. NO traffic associated with the Project should use this road for any purpose whatsoever.

71. Traffic associated with the Project will also affect roads outside the scoping boundary, in particular the A12. This needs consideration.
72. Of the key junctions, there are notable omissions, being: the junction of the A12 and the A1094; the junction at Snape of the A1094 and the B1069. Both are dangerous junctions already nearing capacity and require assessment.
73. Friston has a highly valued footpath network popular with residents and visitors alike. FPC wishes to see a full assessment of these paths undertaken by NG
74. Table 15.2 shows increased congestion and increased journey times relating to Abnormal Loads to be scoped out of assessment. This is unacceptable as delivery to both the connection hub and converter station sites involves the use of local roads. The effects of the delivery of abnormal loads must be scoped in to the Assessment.
75. The Scoping Report proposes GPS tracking for HGVs but not for LGVs. The movements of LGVs must be restricted to main access routes and not be allowed to “rat run” through villages and minor roads.
76. The Report proposes to assess Impacts on 2028 Future Development to take account of committed development and transport schemes. Cumulative impact of traffic relating to all energy projects must be assessed and not merely traffic relating solely to the LionLink project. FPC notes Rule 1 where traffic flows on highway links will increase by more than 30% and this figure must be assessed cumulatively. Likewise Rule 2 applies to highways of high sensitivity where there is a threshold of 10%.
77. FPC also notes IEMA guidelines on defining sensitive receptor locations as follows: people at home; people at work; sensitive or vulnerable groups, hospitals, places of worship; schools; retail areas; recreational areas; tourist attractions; collision clusters/routes with road safety concerns and junctions and highway links at or over capacity; historic buildings. All of these sensitive receptors are present in the local area and must be properly assessed.
78. Table 15.3 attempts to assess this sensitivity but is based on the number of sensitive users present without any definition of the extent of the area being assessed. This is totally arbitrary. For example, Medium Sensitivity is defined as “*Many residential properties with direct frontage to highway link being used as construction route*”. What is meant by “many” and over what distance? Low Sensitivity is defined “*Few residential properties with direct frontage to highway link or Workplaces with direct frontage to highway link.*” This definition of Sensitivity is loaded in favour of the developer to assign a low level of sensitivity. This is unacceptable in a quiet rural area.
79. Table 15.6 categorises the overall magnitude of impact of a highway link or junction. Again the levels are loaded in favour of the developer. For example to achieve a high impact on driver delay due to congestion, there would need to be an increase in traffic of 90% and above. An increase of 30% is considered negligible. This is unacceptable and all the figures require substantial revision downwards.
80. Paragraph 15.7.42 states that all Traffic and Transport effects associated with the construction onshore would be temporary effects and that professional judgement will be used on the duration of these effects. As far as the local community is concerned the prospect of traffic impacts cumulatively with other projects will not be perceived as temporary and will require full and proper assessment.

### **Socio Economics, Recreation and Tourism**

81. FPC notes the main themes raised in the Non-Statutory Consultations, which are reported at paragraph 16.2.2. FPC then notes at paragraph 16.3.3 that a 500M buffer outside the Onshore Scoping Boundary is to be used for the majority of the effects. This clearly cannot be applied to traffic nor should any

assessment be restricted to the LionLink project in isolation. Cumulative impact with all other projects on the visitor economy as well as the economic effects on the local population, who will see a drop in value of their homes and businesses must be assessed.

82. Table 16-5 lists community facilities and open spaces within the local study area. With regard to Friston, the village hall is missing from this list and should be added for assessment.
83. Table 16.6 lists visitor attractions within the local study area. Notably Snape Maltings is missing from this list. Snape Maltings draws visitors nationally and internationally to its famous concert hall plus an extensive retail development which is open 7 days per week year round with the exception of Christmas. The value of Snape Maltings culturally and economically cannot be understated and should be properly assessed, together with traffic impacts.
84. Table 16.7 attempts to list development land in the area. The notable omission here is the South Saxmundham Garden Neighbourhood, which is a proposed development of 800 houses and an employment area close to the converter stations and connection hub site. <https://eastsuffolk.inconsult.uk/localplanfinaldraft2019/viewCompoundDoc?docid=10604948&partid=10614932&pfv=y> This development must be included within the Scoping Report.
85. Table 16.8 is the scope of the assessment. Impacts, both direct and indirect, on residential property have been scoped out. It is not acceptable to only consider community amenity, as there will inevitably be individual properties who suffer worse effects than others. The effect on the value and the saleability of homes should also be assessed.
86. Also scoped out is the potential for impacts on the availability of tourism accommodation in East Suffolk due to use by the construction workforce. The reason given is *"it is expected that the majority of the construction workforce will be sourced locally"*. At Table 16.3 unemployment in East Suffolk is stated to be 2.6% compared to a national average of 3.5%. Further there are skills shortages locally. The LionLink project cannot make an assumption that it will source its workforce locally especially when there are other projects, such as Sizewell C concurrently requiring a huge workforce. The availability of tourist accommodation should be scoped in.
87. Impacts during operation have also been scoped out. Impacts at Friston and Saxmundham will continue to be felt in Friston and Saxmundham. Friston has a number of holiday cottages and a large proportion of second homes, which will be less attractive to visitors and prospective buyers. Impacts during operation should be scoped in.

### **Climate Change**

88. Paragraphs 27.3.3 to 27.3.8 deal with Greenhouse Gases. There is no mention of the gas to be used within the connection hub building, which would typically contain SF6 gases. SF6 gases are linked to global warming and climate change and need to be properly assessed. To date there are no completely "green gases" which can be used to insulate the connection hub building. This matter requires careful scrutiny.
89. Paragraph 27.4.6 states *"As the construction period is in the short term (2027-2029) climate change is not expected to result in significant changes"*. The effects of climate change are already being experienced and it will be important that up to date information is provided as the project goes through the NSIP process. For example Storm Babet in the autumn of 2023 caused extensive flooding across East Suffolk with Suffolk County Council estimating 60-80 investigations are required compared to 3-4 in a normal year.  
<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/storm-babet>



90. FPC notes at paragraph 27.4.6 that during operation increased occurrence of lightning could result in structural damage to infrastructure, power surges and tripping electricity breakers and fires. FPC is very concerned about the potential for fires at the Friston connection hub which is close to the village. The combination of a fire and a wind from a northerly direction (NW,N, NE) direction could result in toxic gases in the village.

### **Accidents and Disasters**

91. Surface water flooding has been scoped out (this should not be scoped out for Friston where the flood risk is recognised as high).

92. Thunderstorms have been scoped out. FPC has raised before the risk of connection hubs and converter stations catching fire. Thunderstorms should be scoped in for electrical installations.

93. Wildfires have been scoped out. Wildfires were a serious problem in East Suffolk during the summer of 2023 and should be scoped in. Summers are increasingly dry.

94. Public demonstrations have been scoped out with the comment: *“The proposed Scheme is located in a rural area and generally stable and whilst there are opposition groups it is unlikely to result in widespread civil unrest”*. This is complacent. The conduct of National Grid in not being transparent about its plans for a major connection hub at Friston, with the multiplicity of other projects this will involve, has resulted in widespread ill feeling and anger. This can only grow once the impacts of construction begin to be felt.

95. Table 28.3 has scoped out a wide range of major hazards including utilities failures, transport accidents, malicious attacks and human error. As above it is complacent to scope out these matters. In particular the existing overhead lines at Friston should not be considered as ‘not vulnerable’ as is suggested in Appendix 28-A.

### **Cumulative and Combined Effects of the Project<sup>3</sup>**

96. The text at paragraph 29.1.3. refers to a Cumulative Development Boundaries Map at Figure 29.1. However this is predominantly an offshore map and the only onshore information given is an Onshore Zone of Influence extending 10KM from the Scoping Boundary. This is insufficient information and a separate onshore map at a much larger scale should be provided.

97. No Zone of Influence has been established for traffic and this needs to be determined and properly cumulatively assessed.

98. As stated previously, FPC is concerned that no ‘Long List’ or ‘Short List’ relating to cumulative effects has been produced. PINS Advice Note 17 provides for these stages 1 and 2 to be undertaken before requesting a Scoping Opinion. The lack of such lists is unacceptable and a definitive list of all projects and developments must be made available. This current request for a Scoping Opinion is therefore premature.

99. FPC notes that a Zone of Influence for noise and vibration during construction is 300m from the order limits and that during operation the ZoI is 1km from the converter station and connection hub. The ZoI for construction is too low.

The ZoI for Health and Wellbeing is a mere 250M. It is imperative that the health and wellbeing of all residents of Friston is properly assessed.

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<sup>3</sup> See also comments on Policy above

## **Conclusion**

100. This Scoping Report is inadequate with serious omissions demonstrating a lack of understanding of the Friston area and the impacts of multiple projects.. It seeks to minimise the effects of both the LionLink project itself and also in combination with an as yet unidentified list of other development in the area. It takes no account of the Recommendation Report issued by the Examining Authority with regard to the EA1N and EA2 projects. Indeed some important issues which arose are proposed to be scoped out. The ExA found that the “**utmost**” care should be taken. This Scoping Report does not demonstrate care let alone “utmost care”.
101. FPC has the impression that National Grid considers the DCO process to be a ‘negotiating game’ where NG puts forward an unreasonable position in the Scoping Report and any movement from that is regarded as NG demonstrating how fair and reasonable it is as a developer. This is a waste of time and resources for everyone. It is also particularly unfair to local communities who have limited time and resources, as opposed to NG which has relatively unlimited time and resources, facing an unprecedented number of DCO applications.

**END**

Dear Sir/Madam,

4<sup>th</sup> April 2024

### **Lion Link**

We write on behalf of the combined Parish Councils of Frostenden, South Cove and Uggeshall to express in the strongest terms possible our opposition to the current plans for the development of the Lion Link project. Whilst there are numerous reasons for objecting to the proposed scheme our opposition is based upon the following fundamental factors:

- The impact that the development would have on what is essentially a rural economy in which the tourism industry plays a major role. We believe that the development as currently planned will have a materially negative impact on the local economy with few benefits being delivered.
- The impact on local flora and fauna, wildlife and local landscape on what is known as The Heritage Coast. With the development of Sizewell C alongside the variety of other grid-based projects such as Sea Link it is possible that East Suffolk will turn into one large construction site.
- There are a variety of similar projects currently being proposed in Suffolk, but it would appear that each will be considered individually. It is critical that all of the potential projects are considered together by the Planning Inspectorate, and that their cumulative and aggregate impact is considered.
- We do not believe that alternative solutions have been properly considered. In particular the potential use of a Modular Offshore Grid (MOG) seems to have been discounted because current legislation does not allow for its use. We consider this to be an unacceptable response and would request that this option be re-considered.

We accept the need for offshore wind both from Energy Transition and Security of Supply perspectives but do not consider that the Lion Link project as currently presented is the best way to achieve either of those objectives.

Yours Faithfully

  
Ian Catterall

For and on behalf of the combined Parish Council of Frostenden, South Cove and Uggeshall.



---

**From:** Kim Balls <[REDACTED]>  
**Sent:** 03 April 2024 15:09  
**To:** Lionlink Interconnector  
**Subject:** EN020033 LionLink - EIA Scoping Response - Great Yarmouth Borough Council

You don't often get email from [REDACTED]

Dear Sir/Madam,

Thank you for notifying Great Yarmouth Borough Council, as a relevant consultation body, in relation to the above Scoping Opinion for the above LionLink scheme.

I can confirm that Great Yarmouth Borough Council does not have any comments to make regarding the above scheme.

Regards,

---

**Kim Balls MRTPI (He/Him)**  
Principal Strategic Planner  
Strategic Planning  
Planning and Growth  
Great Yarmouth Borough Council

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Winners at the LGO Awards 2023 for 'Economic Support'  
Highly Commended at the MJ Awards for 'Community Heroes'

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Dear Sir/Madam,

Date: 26/03/2024

**PROPOSED LIONLINK PROJECT  
PROPOSAL BY NATIONAL GRID LIONLINK LIMITED  
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2017 (as amended) REGULATIONS 10 and 11**

Thank you for your email on 7<sup>th</sup> of March 2024 regarding the information to be provided in an environmental statement relating to the above project.

**HSE's land use planning advice:**

**Will the proposed development fall within any of HSE's consultation distances?**

For this EIA scoping notification and consultation from the Applicant, according to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is not within the consultation zones of any major accident hazard sites or major accident hazard pipelines. This is based on the proposed DCO boundary (as of March 2024), the red line, of Figure 1-3 Proposed Onshore Scheme Scoping Boundary and Scheme Components (LL-ARP-FIG-DEV-0014-P01, Rev P01) viewed here [Scoping Report - Onshore Figures submitted to the Secretary of State on 6 March 2024](#).

HSE's Land Use Planning advice [[HSE: Land use planning - HSE's land use planning methodology](#)] is dependent on the type of population and location of areas where people may be present within HSE's land use planning zones. As the project area 'redline' is not within any of HSE's land-use planning zones, under HSE's existing policy for providing land-use planning advice, HSE would not advise against the development. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

**Would Hazardous Substances Consent be needed?**

Based on the [Environmental Impact Assessment Scoping Report \(March 2024\)](#) and [its supporting Appendix](#), it is unlikely that hazardous substance consent ('HSC') will be required.

Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. For substances under the controlled quantity, there is an '[addition rule](#)' in Part 4 of Schedule 1 for below-threshold substances.

Further information on HSC should be sought from the relevant Hazardous Substances Authority, if required or if changes to the scheme are made.

**Consideration of risk assessments**

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G on the Planning Inspectorate's website [[Annex G – The Health and Safety Executive](#)]. This document includes consideration of risk assessments under the heading "Risk assessments".

**Explosives sites**

Explosives Inspectorate response is no comment regarding this project as there are no HSE licenced explosive sites in the within site boundary of the proposed development.

**Electrical Safety**

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at [nsip.applications@hse.gov.uk](mailto:nsip.applications@hse.gov.uk). We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team



Historic England

EAST OF ENGLAND OFFICE

Environmental Services  
Operations Group 3 The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
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Our ref: PL00791509  
Your ref: EN20033  
Telephone 01223 582710

BY EMAIL

info@lionlink.nationalgrid.com  
lionlinkinterconnector@planninginspectorate.gov.uk

02nd April 2024

Dear LionLink Team,

**Request for a Formal EIA Scoping Opinion for the 'Lion Link Project'**

**Summary and General Comments**

Historic England has been notified by letter (Planning Inspectorate dated 07<sup>th</sup> March 2023) about a scoping request for the proposed Lion Link electricity interconnector project. The Lion Link Project is a proposal by National Grid Lion Link Limited to reinforce the transmission network in the South East of England and East Anglia.

The Project comprises a new interconnector with a capacity of up to 1.8 gigawatts (GW) to link the Electricity Transmission Systems (NTSs) of Great Britain (GB) and the Netherlands. It includes a connection into a wind farm located in Dutch waters.

The project would comprise two HVDC cables and two fibre optic cables with a landfall location on the Suffolk coast between Southwold and Walberswick (see Section 2.3.51).

The letter is accompanied by the Lion Link Environmental Impact Assessment Scoping Report which includes volumes with the text, figures and appendices (dated March 2024).



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Historic England, as the governments lead advisors on the historic environment would like to offer our comments on this proposal, taking into consideration the information provided by the applicant in the scoping report.

We are aware that although not within the definition of a Nationally Significant Infrastructure Project (NSIP), a Section 35 direction was made under the Planning Act 2008 to the Secretary of State in July 2022 and that that this project will now be treated as a Nationally Significant Infrastructure Project (NSIP), as defined under Part 3 of the Planning Act 2008 (as amended).

Our primary concern in relation to this proposal is the impact of the development upon the significance of designated heritage assets and non-designated heritage assets, both from construction and within the area surrounding the development. This includes impacts and changes to the setting of heritage assets.

Our comments are set out in in a what that that correspond to the report structure.

We are aware this is a scheme which is partly outside of UK terrestrial and marine environments. We feel it could be beneficial to have a discussion about assessment standards and approaches for the historic environment across the scheme in order to replicate and synthase data. Particularly across North Sea areas.

## **Historic England Advice**

### **Chapter 2: The proposed Scheme Description**

**Tables 2-1 & 2-2** This section outlines some of the key characteristics of the Friston Substation, but only the above-ground footprint has been stated.

Details of the below-groundwork/impact are also needed in order to understand the potential archaeological impact. The same comments apply to the convertor station (Table 2-5). Further archaeological assessment will also be required to inform the ES.

The setting of heritage assets is also a consideration and would also need to be addressed in the ES, via the LVIA and heritage impact assessments.

**Sections 2.3.13 and Table 2-10** HVAC and HVDC cables – there are a number of different scenarios of how this element of the work may be brought forward, but all scenarios would have a below-ground impact. The trenches would need to be up to 2.45 m by 1.5 m for the HVAC cables onshore (Tables 2-3 and 2-4), and up to 3 m by 1.5 m for the HVDC cables offshore (Table 2-10).



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Key areas of the cable routes will also need to be taken underground to avoid features, such as rivers and railways using approaches such as horizontal directional drilling (HDD). The cables will also be brought on land using HDD approaches (Section 2.3.48).

We acknowledge historic environment assets are likely to be impacted and as stated above recommend further assessment work is undertaken to inform the ES.

In addition to the direct physical impacts of the drill on archaeological deposits and remains of interest, the issues associated with the breakout of the drilling fluids used as part of the HDD process (e.g. bentonite slurry) will need to be considered in terms of the impact that this may have on any buried archaeological remains.

This needs to be considered in the ES, and mitigation included in the Written Scheme of Investigation (WSI) for archaeological mitigation.

**Section 2.3.48** This section states that the cables will be brought on land using HDD approaches. This technique can directly impact any buried archaeological remains located in the path of the HDD route. If this technique is to be used, the potential issues associated with bentonite slurry outbreak will again need to be considered with mitigation as set out above.

**Section 2.3.5** It is noted that there are currently two options being considered for the landfall location. We have serious concerns over both locations because we are aware there are significant issues about the historic environment in those locations. Further discussions are recommended as soon as is practical.

**Sections 2.3.58 and 2.3.65** Several of the Site Preparation works have the potential to physically impact below-ground archaeology. This includes the impacts of any temporary changes to the local groundwater levels that could alter the preservation conditions of nearby archaeological sites. It should be noted that these impacts may be felt outside of the redline boundary of the proposed scheme. This would need to be factored into your assessment.

**Section 2.3.69 & Table 2-9** It is noted that several cable installation approaches are being considered. The impact that each approach may have on buried archaeological remains and on the preservation conditions of the sites will need to be considered as part of the archaeological assessment.

**Sections 2.3.89 and 2.4.24** The use of spud/jack-up legs on barges could impact any near-surface archaeological located offshore, and so the position of barges relative to any archaeological remains would need to be considered.



**Section 2.4.13 & 2.4.16** We have noted that works will be needed as part of the pre-installation work offshore, which will include geophysical, ROV and UXO surveys as well as geotechnical and environmental sampling. We would recommend that an archaeologist is involved in the design and implementation of this work to maximise the potential of the data collected but also to reduce the risk of duplication of effort.

**Section 2.4.19** It should be noted that the pre-installation preparation works (boulder clearance, pre-lay grapnel-run, pre-sweeping of sand waves) may impact any surface or near-surface buried archaeological remains, and assessment is required prior to implementation.

**Section 2.4.22** It is stated that several approaches may be used to bury the cables installed offshore: jet-trenching, conventional narrow cable plough, advanced cable ploughs and cutting. The impacts that these approaches may have on nearby buried or surface archaeological remains will also need to be considered.

**Section 4.2.23** Several different cable protection options are being considered for the cables offshore: rock berms, concrete mattresses, rock bags etc. The installation of these sorts of items can result in localised scour in adjacent areas, which could potentially impact any surface or near-surface archaeological remains. The impacts that these approaches may have on nearby buried or surface archaeological remains will also need to be considered.

## **Chapter 9: Geology & Contamination**

**Section 9.1.3** The section outlines the interrelationships between the information in Chapter 9 (Geology & Contamination) with other chapters discussed within the Scoping Report.

We would recommend that the Historic Environment chapters 11 (onshore) and 26 (marine archaeology) are included in the list as the geological information can aid the production of preliminary deposit models to characterise sequences of deposits and indicate their archaeological potential.

**Sections 9.3.21, 9.3.28, 9.3.39, Figure 9-2** For example, it is stated that peat and alluvial deposits have been identified in areas of the proposed development. Peat is of high archaeological and palaeoenvironmental potential as it can preserve evidence of past environments, landscape, land use and climate change. Peat can also preserve organic archaeological and environmental remains of interest, such as wood, leather and a range of environmental remains.

**Section 9.3.40** It is noted that the Pakefield to Eastern Barents Geological SSSI is located directly to the north of the proposed Southwold Landfall site. Deposits of archaeological interest have been recorded at Pakefield that date to the Lower



Palaeolithic (c.670-790,000 yrs ago). These are of national importance and the potential for similar deposits to be present at the proposed Southwold Landfall site should therefore be considered.

**Section 9.3.47** The Dunwich River is located 170 m to the southeast of the proposed Walberswick landfall site. The archaeological and palaeoenvironmental potential of the area around the river will need to be considered due to the resources that these sorts of environments offered people in the past (food, resources for crafts, transport etc.).

**Sections 9.4.2, 9.4.3 & 9.6.2** It is noted that the construction and operation works associated with the proposed project could result in the mobilisation of contaminants. The impact that these contaminants may have on archaeological sites will need to be considered. This could include how the contaminants may change the preservation conditions of a site, or that the contaminants could limit the assessments that could be carried out on archaeological materials in the future.

We also recommend that the following Historic England document is referred to:

*'Land Contamination and Archaeology'* (2017) <https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/>.

**Sections 9.4.2** It is stated that the construction work at the proposed Southwold Landfall site could result in opportunities for geodiversity enhancement through the temporary exposure in area of geological importance, or through the provision of data from ground investigation. As stated above, there is the potential for deposits of archaeological and palaeoenvironmental importance dating to the Lower Palaeolithic period to be present in this area.

We would therefore recommend that the archaeological potential and value of these deposits are also investigated as part of this work. Likewise, this is potentially a negative impact upon archaeological deposits.

**Sections 9.5.4 & 9.7.4** A programme of intrusive ground investigation works are being designed for the proposed landfall locations and the Refined Scheme Boundary. We would recommend that an archaeologist is involved in designing this work in order to investigate the archaeological potential and significance of the deposits impacted by the proposed construction work, but also the potential impact of issues such as contamination.

We would also recommend that the following Historic England documents are referred to in these sections:



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*'Environmental Archaeology'* (2011): <https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/>.

*'Geoarchaeology'* (2015): <https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>.

*'Deposit Modelling and Archaeology'* (2020): <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>.

*'Land Contamination and Archaeology'* (2017): <https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/>.

**Section 9.7.3** It should be noted that the information obtained to understand the geology and contamination risks discussed here (e.g. BGS borehole data) can also be used to develop a preliminary deposit model. The deposit model would help to characterise the sequence of deposits and understand their archaeological and palaeoenvironmental potential.

## **Chapter 11: Historic Environment**

**Section 11.1.3** We are pleased to see that the interrelationships with other disciplines are noted, but we would recommend that Chapter 12 (Hydrology) is also included in this section.

**Section 11.3.2** It is stated that the study area extends beyond the Onshore Scoping Boundary for some receptors to determine an appropriate Zone of Influence. This includes factors such as the hydrology and hydrogeology discussed in Chapter 12 (Section 12.3.3).

**Section 11.3.3** The study area for the designated heritage assets include a 1 km buffer. For non-designated heritage assets, the study area is limited to Onshore Scoping Boundary. The difference between gathering information for assessment of setting impacts and direct impacts have not been clearly defined.

Historic England supports refining of the scope of the assessments; however, applicant should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

We are particularly concerned that data concerning non-designated heritage assets outside Onshore Scoping Boundary is not used to inform the assessment of archaeological potential of the area. Appropriate buffers for gathering information should be agreed with relevant stakeholders and used for assessments.



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The baseline information and scope of assessment for setting impacts could be defined differently from direct impacts, this however will need to be clearly stated and described. The baseline for setting impacts should also consider landscape and the zone of theoretical visibility assessment.

**Table 11-1 & Section 11.7.7** lists the sources that will be used to provide the baseline information. We would recommend that the Coastal and Intertidal Zone Archaeology Network (<https://citizan.org.uk/>) data is also included and used for the areas of the proposed landfall zones.

**Section 11.3.8-10** Plans showing extent of Conservation Areas are out of date. Southwold Conservation Area and Walberswick Conservation Area boundaries were amended on the 12<sup>th</sup> January 2024. In case of Southwold CA areas have been added either adjacent or within Scheme Scoping Boundary. The assessment of impacts should be based on the up to date data related to designated heritage asset (see also Figure 11-1 Sheet 7 of 8)

**Section 11.3.10** It is noted that two of the scheduled monuments are located within the Onshore Scoping Boundary, which includes the Moated site in Moatyard Covert (NHLE 1005978). There is the potential for conditions conducive to the preservation of organic archaeological and palaeoenvironmental remains to be present within the moated parts of the site. It would therefore be important to consider if the proposed development would impact on the scheduled monument and the preservation conditions for the site.

For example, any changes to the local water environment could result in deposits drying and being exposed to oxygen, which in turn could result in the degradation and loss of vulnerable archaeological remains.

**Section 11.3.11** The area covered by the proposed Onshore Scoping Boundary represents a busy archaeological landscape, with 413 entries recorded in the SHER. The presence of previously unknown heritage assets with archaeological interest in the Suffolk landscape has been demonstrated by other infrastructure schemes.

Potential for survival of unknown archaeological remains should be recognised and should inform need for further surveys and assessments. Account therefore needs to be taken of this density and the impact that managing archaeological landscapes, including ensuring adequate time is given to understanding the significance of these assets and managing appropriate outcomes within the project timetable.

**Section 11.3.13** It is acknowledged that known early prehistoric sites are rare within the proposed Onshore Scoping Boundary, but the based on recent findings the



potential should still be given appropriate consideration. This is particularly important for the proposed landfall locations where deeply buried deposits with potentially very early finds may be impacted.

**Section 11.3.15** We understand that this Section also relates to remains datable to the Anglo-Saxon period (early medieval remains are mentioned). If this is the case, then the assumption for presence of remains predominantly within build up areas is not entirely correct. The nature of these remains makes them hard to detect without intrusive investigations. Extensive and previously unknown Anglo-Saxon remains have been identified in recent years in the wider area of coastal Suffolk during archaeological works. The assessment of potential should take these findings into account.

**Section 11.3.31** The shortlisted Landfall Site likely contains one of historic channels of the River Blyth, with high potential for presence of palaeoenvironmental evidence and archaeological waterlogged deposits associated with development of the town of Southwold. Several finds including boat timbers and side rudders dating to Late Anglo-Saxon period have been recovered from Buss Creek directly to the west of the Landfall Site (HER - SWD 006). The archaeological potential of this area is therefore high.

Non-designated heritage assets recorded outside of the Proposed Onshore Scheme Scoping Boundary (within appropriate buffer) should be considered when assessing archaeological potential of the area.

This area is also located adjacent to amended boundaries of the Southwold Conservation Area.

**Section 11.3.33** The statement of high archaeological potential of this area is correct. The area likely contains part of abandoned settlement of Walberswick dating to early medieval and medieval periods. It has been suggested that well preserved remains of structures, including a possible early church are located in this area.

The significance of this area has been suggested as being very high, in the context of other lost medieval settlements on the Suffolk coast such as Dunwich. Given it may potentially have an equivalence in policy terms to that of a designated heritage asset any assessment would need to establish these values and consider this policy question.

**Section 11.4.3** This section summarises the permanent impacts that may occur during the construction phases, including physical damage through direct impact or vibration, and the changes to setting.



We recommend that the impact of the development on groundwater levels is also considered. Specifically, that changes to groundwater levels may result in impacts upon the local preservation conditions, which in turn could lead to the damage and loss of vulnerable waterlogged archaeological remains that may be present within the development areas or in adjacent areas. This could include items such as wood, leather or palaeoenvironmental remains.

We would also consider changes to the preservation conditions of a site to represent a direct impact to the historic environment

If there is potential for the proposed work to impact groundwater levels, additional work may be required to understand the water environment, the nature and scale of any potential changes and how any impacts could be mitigated. We would therefore recommend that the following Historic England document is referred to.

*'Preserving Archaeological Remains'* (2016) (<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>).

**Section 11.5.3** We welcome inclusion of embedded measures to avoid harm to heritage assets. We would like to stress that results of archaeological surveys would need to be considered, therefore undertaking these surveys early in the process is crucial to inform the design of the scheme

**Section 11.5.5** We welcome that archaeological assessment will be informed by geophysical and landscape surveys. Additional surveys might also be required. It is stated for example that the assessment of archaeological potential and the development of an appropriate mitigation strategy will be informed by targeted geophysical and topographical survey. It is further stated that this would be supplemented by a targeted scheme of trial trenching "if appropriate".

We would recommend that targeted trial trenching is carried out prior to the submission of an ES, to inform the statements of significance that underpin the ES and to aid the development of a robust mitigation strategy.

This work would ground truth the findings of the survey programme, but also answer questions about the nature and extent of the remains present as well as their condition. This is of importance when seeking to consider the heritage values and significance of the site at the Walberswick landfall and whether they have equivalence to a designated heritage asset in policy terms. (See our comments at Section 11.3.33)

Historic England would want to highlight the need for undertaking appropriate surveys prior to preparation of assessment to enable understanding of significance of



the affected heritage assets and degree of any harm. The extent of the surveys should be agreed with Historic England and other stakeholders prior to commencing.

**Section 11.5.6** We are pleased to see that an Overarching Written Scheme of Investigation (WSI) will be produced to cover the scope of the works required to mitigate impacts to the historic environment. We look forward to reviewing this document in due course. Please ensure it is shared with Statutory Consultees as early as possible

**Section 11.6 (Table 11-4)** We agree that temporary and permanent effects during construction and operation phases would need to be scoped-in and included in the assessments of potentially significant effects. We understand that de-commissioning impacts have been scoped out of the assessment. The document should list the phases which have been scoped out for completeness.

**Section 11.7.2** We are pleased to see that a DBA will be produced as part of the initial heritage assessment, but we would recommend that a preliminary deposit model is also produced for key parts of the proposed scheme. This work would be desk-based and utilise information that is being collated as part of the assessment for other disciplines (e.g. BGS borehole information, geotechnical data etc.). The resulting model would aid the characterisation of the sequence of deposits and provide an indication of their archaeological and palaeoenvironmental potential.

**Section 11.7.2** If waterlogged, organic archaeological and palaeoenvironmental remains are present it may be necessary to understand the water environment and how the proposed development may alter the at current situation (Section 11.7.2).

It is also noted that a Hydrogeological Impact Assessment will be undertaken to assess the potential hydrogeological impacts of the proposed scheme (Section 12.7.17). We would recommend that this work is also used to investigate the potential impacts to heritage assets through changes to the conditions of the archaeological site and/or the remains. As noted elsewhere, we would also recommend that the following is referred to.

*'Preserving Archaeological Remains'* (2016, <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>)

This document outlines the staged approach to assess the water environment, which may be like the assessment procedure mentioned in Chapter 12 (Section 12.7.19).

**Section 11.7.3** A Historic Environment Desk-Based Assessment would ideally be based on all relevant information. While we support the refining the study area, assessment of the archaeological potential should consider non-designated heritage





assets with archaeological interest within the 1 km buffer zone. Basing it solely on Refined Scheme Boundary would exclude information relevant to accurate characterisation of archaeological potential of the area (as in case of Southwold Landfall site).

**Section 11.7.7** In addition to listed sources an effort should be made to obtain the results of archaeological works undertaken in the study area for other infrastructural projects. These results might not yet be incorporated into local Historic Environment Records. The relevant data should also be used when conducting an assessment. The local authority should be able to provide additional details on this matter.

**Section 11.7.8** We noted the use of an ‘archaeological walkover survey’. While we support the need for walkover survey; it needs to be recognised that its use to determine the potential for previously unrecorded heritage assets is limited to above ground remains only (such as historic buildings and landscape features, historic routes, etc.).

We recommend the assessment of potential for unknown buried archaeological remains should be informed by different survey methods (geophysical surveys, trial trench evaluation etc).

The Walkover Survey should also include a Site Inspection of any heritage assets where a potential impact through changes to setting is identified; in order to inform the baseline setting assessment of heritage assets and impact assessment.

**Section 11.7.10** Standard geophysical survey and evaluation trenching will be appropriate for relatively shallow archaeological remains. However, boreholes, deposit modelling, and deep penetrating geophysical techniques are recommended where more deeply buried remains might be expected. Appropriate survey method should be used depending on the location.

Deposits of archaeological interest are likely to lie below the depth of standard geophysical survey across parts of the Reydon Common Marshes and within the valleys of rivers Wang, Blyth, and Old Minsmere.

Results should be informed-by and feed back into deposit models, to map the distribution and character of the buried deposit sequence. We would expect to be consulted on the Written Schemes of Investigations (WSIs) for any elements of work.

**Section 11.7.11** Historic England would expect to be involved in these discussions to ensure that appropriate assessment of historic environment has been conducted.



**Section 11.7.12** – We would recommend that in addition to listed documents following guidance was also referred to:

*'Preserving Archaeological Remains'* (2016) (<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>)

*'Deposit Modelling and Archaeology'* (2020) <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>

**Section 11.7.14** Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting of the designated heritage assets (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be in an appendix and seen as material that supports a clearly expressed and non-technical narrative argument within the cultural heritage chapter.

**Section 11.7.19 Table 11-5** Further clarification of the criteria for establishing importance and the values of heritage assets is needed. For example, no clear differentiation of the significance of non-designated archaeological remains has been provided and the distinction between classification of conservation areas (medium and high value) is not sufficiently explained.

It should also be recognised that certain remains might not be eligible for designation, however they can still be of national or international importance. Equally, some categories of archaeological remains might be of less than regional importance.

This needs to be reviewed and amended prior to undertaking any further assessment.

**Section 11.7.19 Table 11-5** Clarification of Magnitude of impact descriptions would be helpful. Separately, provision of descriptions for setting and direct impacts would be beneficial for making transparent assessment of these impacts. 'Loss of heritage asset, but not adversely affecting the integrity' is listed as an impact of medium magnitude. It is not clear what is meant by this statement, which suggest that total loss of heritage asset might not result in loss of its integrity.

**Section 11.7.23-11.7.26** The terminology used in Table 5-3 (Assessment of significance of impacts) is not consistent with list provided in Table 11-7 (Significance of effect descriptions). As such it is not clear how the described process of



assessment relates to the outcomes. Clarification and use of standardised terminology are needed.

**Section 11.8.4** It is assumed that all archaeological remains within the footprint of the scheme would be removed, and that there is the potential for the setting of assets to be adversely impacted. We would recommend that the potential impacts to changes of preservation conditions (e.g. from changes to the local water environment) are considered.

## **Chapter 12: Hydrology, hydrogeology and drainage**

**Section 12.1.3** We are pleased to see that the interrelationships with other disciplines are noted, but we would recommend that Chapter 11 (Historic Environment) is also included in this section.

**Section 12.3.9** It is acknowledged that no site-specific water quality or quantity data (such as groundwater levels) has been collate for the proposed development area, but that site investigations will be carried out. We would recommend that the value of the information to understand the potential archaeological impacts of the proposed scheme are considered.

**Section 12.4.2** It is anticipated that the proposed development may result in the direct physical disturbance of surface water or groundwater features, as well as the mobilisation of contaminants and pollutants. It is further stated that the proposed work may result in the temporary physical modification of groundwater operation which could interrupt natural groundwater flow pathways and groundwater levels. Any changes to the groundwater levels could damage vulnerable archaeological remains that are preserved by waterlogging and anoxic conditions. These issues will need to be taken into account as part of this work to ensure that archaeological information is not damaged or lost.

## **Chapter 18: Marine Physical Environment**

**Table 18-4** It is noted that several of the elements of the proposed development and construction and maintenance operations could result in changes to the coastal processes. These in turn could result in areas of scour. Erosion of the seabed could also therefore result in the exposure and damage of archaeological remains present near the surface of the seabed.

We therefore recommend that these issues are taken into consideration as part of the assessment of marine and coastal heritage assets.

## **Chapter 26 Marine archaeology**



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**Section 26.2.2** mentions that there will be continue engagement with stakeholders in relation to the proposed project and its evolving design. However, no plan or timetable has been shared with us to date in reference to further consultation in reference to when a PEIR might be produced.

It is therefore essential the applicant contact us as soon as possible with an engagement plan and timetable for further discussions.

**Table 26-1, Section 26.3.22 and Table 26-3** These tables lists the data sources used for the Scoping baseline assessment. We would recommend that BGS borehole data and previous geotechnical investigations are included. These sources will provide information that could be used to develop a preliminary deposit model, allowing the sequence of deposits to be characterised and their archaeological and palaeoenvironmental potential to be assessed.

As noted above we also recommend that the Coastal and Intertidal Zone Archaeological Network (<https://citizan.org.uk/>) is included as this may record recent discoveries within the coastal and intertidal zones.

**Section 26.3.22** We also appreciate the recognition given to the potential for archaeological materials to be encountered in the proposed development corridor and the attention given to research frameworks. However, the reference to *North Sea Prehistory Research and Management Framework* is incorrect and should be as follows: <https://researchframeworks.org/nsprmf/> (as accessed through the online Research Frameworks Network).

In reference to the attention given to Historic Seascape Characterisation, it is important to understand that spatial consideration of historic character is designed to provide context for heritage assets as could be encountered by the proposed development.

The reference to other key sources also needs to be updated. For example, the Regional Research Framework for the East of England (<https://researchframeworks.org/>) which have been recently updated.

**Section 26.3.41** Any PEIR subsequently produced should not attempt to equate notions of sensitivity to character types. It is recommended that attention should be given to what change in historic character could be introduced by the proposed LionLink Interconnector project.

This should include a consideration of cumulative change.



**Section 26.4** It is acknowledged that several of the construction and operation impacts within the offshore and intertidal areas could directly or indirectly damage or destroy seabed receptors. This could include all excavation activities, anchorage of vessels, seabed preparation, the installation of cable protection and scour caused by changes to the hydrodynamic patterns.

We agree with the range of potential impacts that may occur during the construction and operation phases. We also agree with the statement that damage to archaeological sites and material is permanent and that design of the project should always apply an avoidance strategy, and support this approach

Involving professional, experienced and accredited archaeological staff and services is therefore essential.

**Section 26.5** We noticed the attention given to adopting an assessment of effects takes into account measures that are embedded into the proposed Offshore Scheme design and that if it is not possible to avoid sensitive receptors, "...measures will be embedded into the design to limit any effects."

We consider it important however, that the assessment exercise does recognise and implements an adaptive approach to selecting an offshore (development) scheme design.

The key aspect of an adaptive approach is that the design selection is directly informed and amended where necessary by archaeological analysis and interpretation of survey data. The objective being to secure in-situ avoidance of features, sites and anomalies of known or possible archaeological interest.

**Section 26.5.4** It is stated that embedded design measures will be implemented if sensitive receptors cannot be avoided. This could include desk-based survey and archaeological review of marine geophysical survey and geotechnical datasets. We would recommend that an archaeologist is included in the design of this work to ensure that opportunities are maximised to obtain useful data for multiple disciplines, but also to reduce the potential for duplication of effort at a later stage.

We would also recommend that a suitably qualified geoarchaeologist is included in the project team at the earliest opportunity. They should be allowed to have direct access to the geotechnical cores in addition to the logs. It is better for a geoarchaeologist to record and assess continuous core sequences rather than isolated deposits or logs as this allows for greater reliability and confidence in the resulting conclusions.



It will also allow the geoarchaeologist to identify the deposits that require archaeological sampling and assessment, carrying out a staged review of samples in line with relevant guidance (e.g. Table 4, Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects, 2021: <https://www.thecrownestate.co.uk/media/3917/guide-to-archaeological-requirements-for-offshore-wind.pdf>).

**Section 26.5.5** A reference is made here to geophysical and geotechnical data acquired in 2023. No initial assessment is however offered as to its suitability for archaeological analysis and interpretation.

We have checked throughout the Scoping Report and we can find no other mention of geophysical or geotechnical survey data acquired in 2023. However, sections 18.7.2 and 18.7.3 (Chapter 18 Marine Physical Environment) are clear that geophysical, geotechnical and environmental surveys have yet to occur, including the use of those data to support identification of “archaeological sites” with a scope for survey campaigns set out in Table 18-6.

We therefore confirm that such data acquisition programmes that should be designed and delivered in consultation with the applicant's specialist archaeological advisors and the analysis reported in the PEIR and as an appendix to the ES.

**Section 26.5.6** We are pleased to see that a marine archaeology Written Schemes of Investigations (WSI) and Protocols for Archaeological Discoveries (PADs) will be produced to manage potential impacts, and to recommend appropriate mitigation. We look forward to reviewing these documents in due course.

We are also pleased to see that Archaeological Exclusion Zones (AEZs) will be applied to known wreck sites, but it should be noted that other known and potential historic assets may require an AEZ to be established until the nature of the assets are better understood.

We therefore recommend more attention is given to production of a marine archaeological Written Scheme of Investigation (WSI) and to the Protocol for Archaeological Discoveries (PAD) prior to the PEIR publication.

It is essential that the Applicant understands the specific purpose of a WSI is to set out a methodological approach to the acquisition and analysis of all relevant survey data (inclusive of geophysical, geotechnical and visual inspection).

The scheme design should be directly informed in a timely way, by archaeological analysis, to allow for adjustment that supports in-situ avoidance or investigation,



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excavation, recovery and conservation should archaeological materials require removal from the development corridor.

The methodological approach and description of survey technologies set out in a WSI should optimise how data are acquired to inform any of the following works should they be necessary (as suggested in Section 2.4.13):

- sand wave clearance;
- boulder clearance;
- seabed preparation that requires dredging; and
- disturbance due to use of any seabed impacting installation vessels.

The use of Archaeological Exclusion Zones (AEZs) also requires more attention.

It is insufficient to only refer to “known wreck sites”. Firstly, an avoidance strategy is only likely to be useful if readily identified charted wrecks are located in the development corridor. Secondly, the use of AEZs must also encompass other seabed anomalies (i.e. not necessarily readily identifiable as “wreck”) for which a professional data interpretation is offered by the Applicant’s archaeological advisors.

It is therefore a fundamental aspect of an AEZ led approach that any proposed exclusions are spaced sufficiently to prevent any direct or indirect impacts. This should help to deliver the intention expressed in Section 26.7.6 regarding known and potential marine heritage receptors.

**Table 26-2** in reference to “Construction” in order to avoid the described “impact” it is essential that the applicants Retained Archaeologist is directly involved in the planning of all subsequent survey campaigns.

In reference to Intertidal heritage receptors, it is directly relevant that WSIs are effectively designed in consultation with the relevant local authority to address any concerns over the use of HDD and so that they can provide a specification for any intertidal walkover survey (as mentioned in Section 26.7.4).

We acknowledge the attention given to possible direct or indirect damage caused by alteration of sediment transport regimes and that an assessment is scoped into the ES through the marine physical environment chapter.

We agree with the scoping in of transboundary impacts through direct and indirect impacts. In reference to project phase “Operation”, and with the potential changes to physical regimes (e.g. sedimentation).

**Section 26.7** We confirm that any PEIR subsequently produced should include desk-based sourced of information. This should include “publicly available



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data sources (literature and Geographical Information System (GIS) mapping files).” However, to produce a baseline character assessment that is adequate for EIA purposes, the Applicant will need to acquire site-specific survey data to corroborate desk-based sources of information, such as listed in Table 26-3 and illustrated in Figure 26-1.

**Section 26.7.2** It is noted that the geophysical data will be assessed by a trained archaeological specialist to provide a full assessment of the known marine heritage receptors. The palaeogeographic baseline survey will also be based on the geoarchaeological review of geotechnical and geophysical datasets (Section 26.7.3).

It should note that dedicated cores for archaeological assessments may be required if significant deposits or remains are identified. It is also not clear that the material from the cores will be assessed for archaeological purposes (e.g. collect samples for dating and environmental analysis) as the discussion focuses entirely on desk-based approaches.

In the sections under “Assessment method” we appreciate the attention directed to identifiable heritage assets and the determination of significance of impact (direct and indirect).

It is important however to take account of, and to make allowance for the limited amount of information about the historic environment located in the English Marine Planning area (inshore and offshore).

It is equally important to generate sufficient evidence to determine the presence of sites, features or other anomalies that should be considered as “heritage assets” (as defined and regardless of any designated status). We therefore direct the Applicant to our “Introduction to heritage assets” guidance series:

*Ships and Boats: Prehistory to 1840* (<https://historicengland.org.uk/images-books/publications/iha-ships-boats/>); and

*Ships and Boats: 1840-1950* (<https://historicengland.org.uk/images-books/publications/iha-ships-boats-1840-1950/>)

These publications provide summaries of what we know about specific vessel types and technological changes that have occurred and how they can be recognised as heritage assets.

It is important to differentiate this guidance from our Designation Selection Guide *Ships and Boats: Prehistory to Present* (May 2012), as presently included in Section 26.7.8, which provides a selection guide used for statutory protection i.e. under the





Protection of Wrecks Act 1973 or Ancient Monuments and Archaeological Areas Act 1979.

**Table 26-4** It is apparent that a “value” system is offered which should be considered in reference to the historic environment as detailed within National Policy Statement EN-1 (Overarching – Energy), published November 2023.

In particular, if a heritage asset is identifiable, then its archaeological “value” has already been determined. The focus should therefore be to determine the significance of the heritage asset(s) and how best to avoid or minimise conflict between its conservation and the proposed development.

**Section 26.7.8** The references included here in need to be reviewed and updated This is because as relevant documents have been published recently. For example, the Historic England document ‘*Managing Lithic Sites*’ (2024: <https://historicengland.org.uk/images-books/publications/managing-lithic-sites/>).

**Section 26.7.21** It is apparent that an approach is being advocated that is based on the “...perceived value of each marine archaeological receptor...” and we consider it relevant to direct the applicant to National Policy Statement EN-3 (Renewable Energy Infrastructure), published November 2023.

We consider any subsequent assessment requires objectivity to identify the presence of any heritage assets and what the impact might be (direct or indirect) associated with the proposed development on the significance of any such heritage asset (whether designated or not).

## Summary

We have set out comments above. Overall, we are broadly content with the applicant's approach to sources, baseline information and the assessment of heritages impact. There are however some very specific matters that need to be addressed before moving forward.

We are conscious there has been little discussion between ourselves and the applicant up to this point. A programme of meaningful dialogue should therefore be considered essential. We also recommend a programme of field work is commenced as soon as possible to inform the PEIR and ES reports. We also consider this should include a trenched evaluation.

We confirm that historic environment represents a potentially significant issue in EIA terms, and confirm that the historic environment should be ‘scoped in’ to the assessment and that further work as outline above is needed.



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We are pleased that marine and terrestrial historic environment matters have been included within the scope for the Environmental Statement (ES). For marine matters because only desk-based sources of information have been accessed so far, corroboration with future survey data acquisition programmes is essential to complete an adequate EIA exercise.

All elements of the proposed scheme will however require excavations, both on- and offshore in order to install the infrastructure. This means these activities will have an impact on any buried archaeology present

Any Preliminary Environmental Impact Report and ES subsequently produced should focus attention on determining the presence of heritage assets and objectively determining how the significance of any such sites might be impacted by the proposed development.

We note the applicant intends to produce an LVIA. We support this approach but recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that would illustrate specific heritage receptors.

These images will be valuable to both inform ES and illustrate the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Ideally though a separate heritage viewpoints appendix should be produced.

The setting of heritage assets is however not just restricted to visual impacts. Other factors should also be considered in this assessment; in particular, noise, light, and traffic. Where relevant, the cultural heritage should also be cross-referenced to other relevant chapters.

We also advise that all supporting technical heritage information is included as appendices.

We strongly recommend that the applicant involve the County Councils specialist advisers on archaeological matters, and we recognise that they are best placed to provide advice on non-designated heritage assets and the programme of assessment.

Likewise, the local Conservation Officer will need to be consulted in relation to the built environment especially Grade II listed buildings which are outside of our remit.



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In addition to the National Planning Statements the development of an ES should also use the ideas of benefit, harm and loss as described in NPPF to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

Alongside appropriate mitigation to offset adverse effects on heritage assets we are also be seeking explicit and demonstrable heritage enhancements and benefits from the scheme to be set out clearly in the application. This could include interpretation, public engagement in the archaeological discoveries, heritage education and a heritage focus in relation to design and placemaking.

### **Recommendation**

We broadly accept the approach set out in the scoping report, but we have some specific concerns and comments. We recommend the applicant consider refining the scope of the scheme to address these comments and review these concerns as they move towards the PEIR stage. This would be in order fully address heritage matters and to fully consider the impact on the historic environment in relation to policy.

If you have any queries about any of the above, or would like to discuss anything further, please contact me

Yours sincerely

Will Fletcher

Dr Will Fletcher  
Infrastructure Lead (East Region)

[REDACTED]



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JNCC Reference: OIA-10060

Planning Inspectorate Reference: EN020033

Date: 4 April 2024

### **LionLink Multi-Purpose Interconnector, National Grid, Scoping Report**

Thank you for consulting JNCC regarding the above-mentioned development proposed by National Grid for which we received the Scoping Report on 7 March 2024.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

The proposed Offshore Scheme that is covered in the offshore portion of the Scoping Report will route from either the Southwold or Walberswick Landfall across the Southern North Sea to the boundary between the UK and Netherlands Exclusive Economic Zones (EEZ).

Our review has concentrated on the following sections of the Scoping Report:

- Chapter 1: Introduction
- Chapter 2: The Proposed Scheme Description
- Chapter 5: EIA Approach and Method
- Chapter 8: Ecology and Biodiversity
- Chapter 19: Intertidal and Subtidal Benthic Ecology
- Chapter 21: Intertidal and Offshore Ornithology
- Chapter 22: Marine Mammals and Reptiles
- Chapter 29: Cumulative and Combined Effects of the Project

Our thoughts and advice on these sections are provided below.

We note that the project passes through the following offshore sites designated for nature conservation:

- Outer Thames Estuary Special Protected Area (SPA), designated for the protection of red-throated diver, common tern and little tern and the conservation objectives of the site are to maintain or enhance favourable condition of the features.
- Southern North Sea Special Area of Conservation (SAC), designated for the protection of harbour porpoise and the conservation objectives of the site are to maintain site integrity by ensuring:
  1. Harbour porpoise are a viable component of the site;
  2. There is no significant disturbance of the species; and
  3. The condition of supporting habitats and processes, and the availability of prey is maintained.

## **Chapter 2: The Proposed Scheme Description**

### **Paragraph 2.4.9**

We note that the final target burial depth would be determined by a Cable Burial Risk Assessment (CBRA) which will be used to inform the EIA.

If possible, we would welcome the opportunity to be able to review the project CBRA once this becomes available. This would provide valuable supporting information on the requirements for any proposed cable protection.

### **Paragraph 2.4.14, pp. 2-29**

Pre-installation survey:

JNCC note that the pre-installation geophysical survey does not require a license for cabling activity so therefore will be scoped out of the EIA. However, as per our advice provided under DAS dated 12<sup>th</sup> January 2024, and noting the acoustic element of the geophysical surveys mentioned within section 2.4.14 (pp.29), JNCC note the cable route passes through the Southern North Sea (SNS) SAC. This site has been designated for the protection of harbour porpoise, a cetacean species at risk of injury due to the impacts of noise. The northern portion of this site has been identified as having higher abundance of harbour porpoise during the summer months and the southern portion of the site as having higher abundance of harbour porpoise during the winter months. JNCC recommend consideration is given to these periods within the survey design to try and avoid times of peak species abundance within the site, as well as the cumulative impacts of other operations that may be planned. Whilst the operations are not licensable, we also recommend that JNCC's marine mammal mitigation guidelines for geophysical surveys are followed to reduce the potential for injury <https://hub.jncc.gov.uk/assets/e2a46de5-43d4-43f0-b296-c62134397ce4>

### **Section 2.4.15, pp. 2-30**

UXO identification and clearance:

Following a desk-based assessment (DBA) and pre-installation magnetometer survey, JNCC agree with the approach detailed to prioritise avoiding potential UXOs by micro-routing the cable. If this is not deemed feasible, JNCC agree that the safe removal of any UXOs is the

preferred approach over any in-situ clearance by detonation. If in-situ clearance is unavoidable then JNCC recommend that low order deflagration is the prioritised method, in line with the Governments position statement. It is JNCC's view that high order detonation of UXOs should only be utilised as a last resort. JNCC understand that UXO clearance methodology will only be determined during the pre-installation survey and will welcome the project's application for a permit at that time, should clearance be required.

#### **Paragraph 2.4.19**

We note in this section that both plough and grab methods are being considered for boulder clearance. We commend the applicant for considering grab methods which are less environmentally damaging than plough clearance. Boulder fields are often areas of high biodiversity providing important niche habitats. However, we question the feasibility and practicality of offering the use of grab methods for significant distances to reduce impacts, and so, we would encourage the applicant to avoid or minimise cable routing through areas of boulder fields.

#### **Section 2.4.43, pp. 2-32**

External cable protection:

We highlight Conservation Objective 3 of the SNS SAC, which states that the 'condition of supporting habitats and processes, and the availability of prey is maintained'. Please ensure potential impacts are considered in light of all the conservation objectives of this site, including the potential for external cable protection to adversely affect this site, both alone and in-combination.

### **Chapter 5: EIA Approach and Method**

#### **Paragraph 5.4.16 - 5.4.18**

JNCC note that decommissioning effects have not been assessed as part of this scoping report and will be assessed at the decommissioning stage. We would advise that any decommissioning details known at this stage still be scoped into the earlier assessment. We also note that the assumption is that the proposed Scheme would need to be removed if it cannot be re-purposed but we would advise that all potential scenarios for decommissioning are considered when the time comes to assess these impacts.

#### **Section 5.8**

JNCC agree with the proposed hierarchical approach to applying mitigation measures, with the primary aim being to 'design out' adverse effects to the greatest extent possible. An example of this might be micro-routing a cable around Annex I stony habitat or boulder fields in the first instance in order to avoid additional rock protection. JNCC would expect sufficient survey evidence as justification as to why avoidance mitigation measures aren't being proposed before any measures to offset significant impacts are considered.

### **Chapter 8: Ecology and Biodiversity**

**Table 8-2, Pp. 8-10,:** Internationally important statutory designated sites within the study area

This table lists the SNS SAC as being '0m east of the Southwold and Walberswick corridors'. As the text states the projects are listed in order of distance from the onshore scoping boundary, and the sites listed prior to the SNS are described as being within the boundary. It is not clear if this is an error?

Additionally, Harbour porpoise are listed in the ES only as an Annex II species with no mention of Annex IV. Noting that the baseline section goes on to discuss EPS licenses granted within the study area for bats, otter, and great crested newt, it would have been beneficial if the baseline section highlighted up front all European Protected Species identified as occurring within the study area in the same way protected areas were highlighted.

## **Chapter 19: Intertidal and Subtidal Benthic Ecology**

### **Paragraph 19.3.1 – 19.3.6**

JNCC agrees with the proposed study area for intertidal and subtidal benthic ecology incorporating the area where there is potential for direct and indirect impacts such as those associated with the deposition of suspended sediments. We also agree with this study area remaining under iterative review in response to refinement of the project design.

### **Paragraph 19.7.1 – 19.7.10**

JNCC notes that environmental sampling will be based on geophysical survey data interpretation and that it is anticipated that sample stations will be located every 5km along the proposed submarine cable corridor. JNCC would like to highlight that sampling effort should be thorough enough to adequately characterise the benthic environment and understand all potential impact pathways that may present themselves throughout the whole cable corridor. We would recommend flexibility is built into the survey scope to allow for this.

We note that within paragraph 19.3.20 and 19.3.21 that there are some areas of predicted *Sabellaria spinulosa* and widely distributed sublittoral biogenic reefs known to occur throughout the study area. We would recommend that the actual extent of these sensitive habitats be determined during the EIA stage. We would encourage the Applicant to consider surveying and potentially micro-routing outside of the survey corridor if sensitive habitat is found to cover the width of the corridor. In some situations, the habitat extent may only extend to just outside the cable corridor and so micro-routing just outside of the corridor could present opportunities for cable micro-routing and reduced permanent rock deposits for cable protection.

JNCC also recommends that adequate geotechnical sampling is undertaken to ensure confidence in the successful burial of the cable for the lifetime of the asset (taking account of potential changes in climate). This will minimise the requirement for future intervention and reduce the likelihood of any subsequent cable protection measures needed in the future. Providing sufficient survey evidence as justification for the amount of rock dump being applied for at the Marine Licence stage will reduce the risk during the application process as it will reduce the footprint of direct habitat loss and the pressure on the benthic environment caused by permanent rock deposits.

We would be grateful to be able to review the full survey reports from the site-specific surveys carried out for this application once these become available. This would allow more time for JNCC to process the information within these reports.

### **Paragraph 19.3.24 – 19.3.32**

JNCC agrees with the designated sites for benthic features that have been scoped into the assessment. We defer to Natural England in regard to comments on all benthic sites within the inshore area (within 12nm of the coast).

North Norfolk Sandbanks and Saturn Reef SAC is managed by JNCC, whilst Haisborough Hammond and Winterton SAC is a jointly managed site by JNCC and Natural England.

The applicant has highlighted the designated features for these sites which are benthic species and habitats. We would recommend that the Applicant reviews the site information and Conservation Objectives available on JNCC's website in order to assess the impact the project might have on these sites<sup>1</sup>.

The applicant states that a Habitat Regulations Assessment (HRA) Stage 1 Screening exercise will be undertaken to consider possible impacts to European designated sites but does not include SPAs within the list of designated sites to be considered. Although SPAs are not designated for benthic features, benthic impact pathways may impact upon the features of SPAs (e.g., suspended sediment can interrupt the foraging activities of diving birds) and so JNCC considers SPAs to be relevant for inclusion here.

### **Paragraph 19.3.33-19.3.36**

JNCC agrees with the applicant's proposed approach to consideration of future baseline conditions including the potential for climate change impacts. Weather extremes will be of particular relevance to cable burial and we urge the applicant to take this into consideration during the EIA stages of the application.

JNCC would also recommend that future designation of protected sites is considered within the project EIA.

### **Section 19.6**

JNCC defer to Natural England in regard to comments on the receptor: intertidal and nearshore habitats.

JNCC disagree with temporary habitat loss / seabed disturbance being scoped out of further assessment for subtidal-broad-scale habitats owing to receptors having medium to high resilience. Whilst we recognise that this impact has been scoped in for subtidal Annex I habitat, we feel this should also be scoped in for other benthic receptors and habitats. Not all preparation techniques to be used have been decided at this stage and we note that in paragraph 19.4.3. the applicant indicates that the impacts of pre-lay grapnel run and sand wave pre-sweeping are included within the impacts of temporary habitat loss / seabed disturbance. JNCC would consider the impacts of these activities to cause significant temporary seabed disturbance and so would advise that temporary habitat loss / seabed disturbance to subtidal-broad-scale habitats should be scoped in for further assessment.

We note that temporary increase and deposition of suspended sediments has been scoped out owing to the control measures detailed in Paragraph 19.5.4. Whilst we recognise that the implementation of these measures will increase the likelihood of these impacts not occurring and the justification for this has been scoped out is relatively robust, JNCC would like to see

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<sup>1</sup> North Norfolk Sandbanks and Saturn Reef <https://jncc.gov.uk/our-work/north-norfolk-sandbanks-and-saturn-reef-mpa/> & Haisborough, Hammond and Winterton SAC <https://jncc.gov.uk/our-work/haisborough-hammond-and-winterton-mpa/>



demonstration of the temporary increase and deposition of suspended sediments being within background levels within the Environmental Statement.

#### **Paragraph 19.7.13 – 19.7.17**

JNCC agrees with the applicant's proposed approach to assessing the impact of works on benthic ecology. We would recommend that the applicant uses the Marine Evidence based Sensitivity Assessment (MarESA) on the Marine Life Information Network website<sup>2</sup> to help with understanding of the sensitivity of receptors identified during desk-based reviews and site-specific surveys to inform the impact pathways identified in Table 19-5.

### **Chapter 21: Intertidal and Offshore Ornithology**

#### **Section 21.5.4**

We agree with the proposed avoidance of works during 1<sup>st</sup> November to 31<sup>st</sup> March, where possible. We recommend that this is implemented, for example through a licence condition, and works are planned around this restriction. Where this is not possible, or it remains uncertain that a restriction can be implemented, we advise that an assessment of red-throated diver disturbance due to vessels is carried out.

In terms of carrying out a vessel disturbance assessment, we recommend that the following steps are taken. In light of evidence of vessel displacement, we advise that a 2km buffer around each vessel is used for the assessment of 100% displacement of red-throated diver (Burt *et al.*, 2022, Burger *et al.*, 2019). We advise that the area of impact should be calculated and put into context of the SPA area by calculating the proportion of the SPA area impacted. We also advise that the number of birds impacted are calculated. Crucially, this should be done by using distribution maps of the relevant features in the relevant SPA. The distribution maps per species should be overlain with the area of impact per species to calculate the number of birds potentially impacted. This can then be put into context of the SPA population by calculating the proportion of the SPA population impacted. This should be done for each vessel present, and the dates that a vessel will be present should also be provided.

For an assessment of the Outer Thames Estuary SPA, we advise that the distribution maps within Irwin *et al.* (2019) are used. The data contained within Irwin *et al.* (2019) consists of two distribution maps per species from two survey days (both in February 2018). Therefore, a vessel disturbance assessment should be made using data from each of the two surveys days, and a mean and range of number of birds potentially displacement presented.

#### **Section 21.7.1**

Data sources on qualifying features of the Outer Thames Estuary SPA is available here <https://jncc.gov.uk/our-work/outer-thames-estuary-spa/>

### **Chapter 22: Marine mammals and marine reptiles**

#### **General**

Please note, we defer to Natural England for all reference relating to seals and otters.

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<sup>2</sup> The Marine Life Information Network website <https://www.marlin.ac.uk/>

### **Section 22.3, pp 22-4 – 22-11**

We agree with the approach to use the relevant cetacean management unit as the study area for the species identified (paragraph 22.3.1, Table 22-1).

The baseline data provided for all species is sufficient and relevant at this stage of the project, although we would expect this to evolve in line with the project's timeline for EIA assessment. In Figure 22-1, the legend has a small error when referring to the naming of species management units; Short-beaked dolphin should read Short-beaked common dolphin (*Delphinus delphis*).

### **Table 22-3, pp 22-10**

We note the information presented in this table but highlight that when assessing cetacean impacts at the population level, the densities provided for the cetacean management units should be applied unless agreed otherwise with the regulator and SNCBs. Note the densities currently presented are based on the SCANS III surveys and will likely be updated to reflect the SCANS IV survey in the near future.

### **Section 22.3.37, pp. 22-11**

In this section we note that *'the proposed Submarine Cable Corridors lie within the winter grounds, as illustrated in Figure 22-2, which cover an area of approximately 12,696km<sup>2</sup>, equivalent to 34% of the entire SAC'*. When reviewing Figure 22-2, the proposed survey routes cross both the winter and summer grounds. We suggest reviewing the JNCC MPA mapper<sup>3</sup> in light of this and that it is made clear in future documents how much of the survey will occur in which area of the site and when i.e. whether the survey will occur during the period of peak abundance for that area.

### **Section 22.4 Potential impacts, pp22-15**

We agree with the impacts identified for the different phases of the project.

### **Section 22.6 Scope of the Assessment, pp. 22-17**

Overall, we agree with the impacts scoped in and out of the assessment, as detailed in Table 22-5.

However, we note the impact changes in prey availability prey does not consider temporary or permanent seabed loss, which would occur should external cable protection be required. As both variations of the proposed cable route will pass through the Southern North Sea SAC, for which Conservation Objective 3 states that, "The condition of supporting habitats and processes, and the availability of prey is maintained," we would suggest that consideration of the potential loss of seabed is also required to ensure that the supporting habitats are maintained within the site. Furthermore, we are content with the approach to scope out underwater noise changes however, we again highlight the JNCCs mitigation guidelines for geophysical surveys recommends pre-data collection searches are undertaken for all surveys using sub-bottom profiling equipment.

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<sup>3</sup> JNCC MPA Mapper <https://jncc.gov.uk/mpa-mapper/?zoom=7&center=-0.105,53.448&layerIds=43,67,74&baseLayerId=-2&activeFilters>

## **Chapter 29: Cumulative Effects and Intra-project Effects of the Project**

### **Section 29.3**

From this section of the Scoping Report, it is clear a cumulative assessment has not been undertaken yet and will be undertaken at a later stage. However, it would have been useful to review a long list of projects anticipated to be assessed at this later stage and we would be grateful to be able to review this list when it becomes available.

This chapter does not include a list of data sources that will be used to assess cumulative effects. We recommend that the applicant considers a variety of sources to assess all potential cumulative effects which may include sources such as Kingfisher Activity Reports<sup>4</sup>, the MMO Public Register<sup>5</sup> and the Crown Estate<sup>6</sup>.

We note that the applicant considers any development with a consent older than five years will have been built or will have lapsed after the three-year consent for commencement has passed. However, JNCC understand that offshore wind farm projects are allowed a seven-year period to commence construction and other industry pressures can cause project delays and ongoing impacts to receptors. JNCC advise that the applicant scopes projects out based on specific information around that project rather than it being five years since consent was granted.

JNCC agree with the proposed methodology for the cumulative impacts to assess inter and intra project related effects on marine mammals.

When compiling information to inform HRA, we would like to ensure that when considering noise disturbance within the SNS SAC, the project prioritises an in-combination assessment that focuses on the daily and seasonal noise thresholds that the summer and winter areas of this site using the prescribed Effective Deterrent Ranges (EDRs). [JNCC's Guidance on noise management in harbour porpoise SACs](#) (2020) should be used to inform the assessment.

Please contact me with any questions regarding the above comments.

Yours sincerely,

**Daisy Leadbeater**

**Offshore Industries Adviser**

Email: [REDACTED]

Telephone: [REDACTED]

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<sup>4</sup> <https://kingfisherbuletin.org/notice-map>

<sup>5</sup> [https://marinelicensing.marinemanagement.org.uk/mmofox5/fox/live/MMO\\_PUBLIC\\_REGISTER/](https://marinelicensing.marinemanagement.org.uk/mmofox5/fox/live/MMO_PUBLIC_REGISTER/)

<sup>6</sup> <https://www.thecrownestate.co.uk/>

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Burger, C., Schubert, A., Heinänen, S., Dorsch, M., Kleinschmidt, B., Žydelis, R., Morkūnas, J., Quillfeldt, P. & Nehls, G. (2019). A novel approach for assessing effects of ship traffic on distributions and movements of seabirds. *Journal of Environmental Management*, Vol. 251, Article 109511 <https://doi.org/10.1016/j.jenvman.2019.109511>

Burt, M.L., Mackenzie, M.L., Bradbury, G. & Darke, J. (2022) Investigating effects of shipping on common scoter and red-throated diver distributions in Liverpool Bay SPA. Report number: CREEM-15198-2017-2. Provided to Natural England (Project ref. 23732) August 2017 <https://publications.naturalengland.org.uk/publication/6581005841596416>

Irwin, C., Scott, M.S., Humphries, G. & Webb, A. (2019) HiDef report to Natural England - Digital video aerial surveys of red-throated diver in the Outer Thames Estuary Special Protection Area 2018. Natural England Commissioned Reports, Number 260. <https://publications.naturalengland.org.uk/publication/4813740218515456>

## Kelsale-cum-Carlton Parish Council

### Response to LionLink Environmental Impact Scoping Report

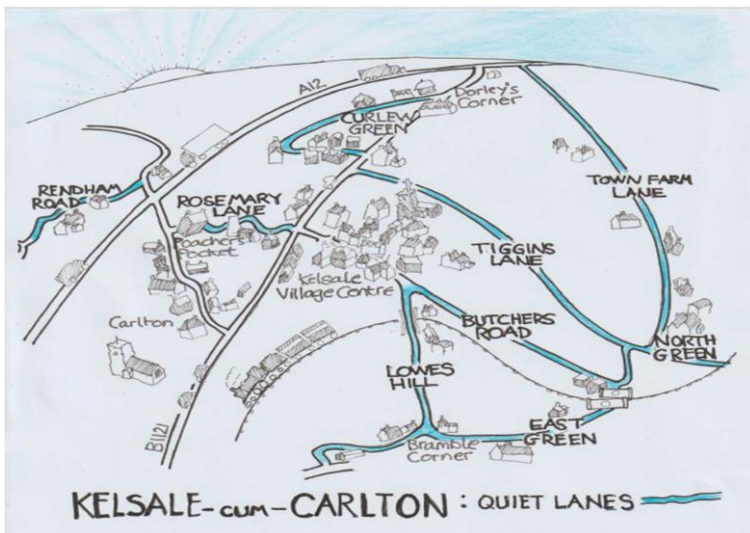
Kelsale-cum-Carlton Parish Council (KcC PC) will focus its response on the deficiencies found in Chapter 15 – Roads and Traffic and Chapter 29 – Cumulative Impact within the Environmental Impact Assessment (EIA) Scoping Report.

KcC PC submitted a general response to the first non-statutory consultation in 2022 when the project was called EuroLink, but now, as plans for LionLink as well as EIGHT (8) OTHER and NINE (9) TOTAL energy projects including Sizewell C have moved forward, KcC has increasingly significant concerns about the capability of our road network to cope and the adverse impact of the potentially substantial volume of traffic on our Parish. No prejudice should be ascribed to KcC's non-statutory consultation response in 2022 as the landscape has changed substantially, especially with regard to the escalation of traffic issues.

### Response Summary

Construction and general traffic related to LionLink, especially with the combined EIGHT (8) OTHER and NINE (9) TOTAL projects concentrated in our tiny parish, will overwhelm the very limited road network in the area. This will result in dangerous conditions for all road users, excess pollution, despoilation of the natural landscape and significant deterioration in the quality of life for local residents. It also must extend the projected construction period for LionLink as well as all of these projects thereby exacerbating the negative effects.

### Description of Kelsale-cum-Carlton Parish



KcC is situated just to the east of the A12 and is about 12 miles south on the A12 from Walberswick (the proposed landfall site for LionLink). KcC is 1.5 miles on the B1121 from Saxmundham, the proposed site for up to 4 converter stations. KcC will, therefore, suffer a substantial negative impact from the construction of LionLink as well as the up to NINE (9) TOTAL energy projects including Sizewell C concentrated in this small, roughly 25-mile area along the East Suffolk Coast.

Prior to 1885, Kelsale and Carlton were separate Parishes, but were combined in March during that year under the divided Parishes Act. The Parish now comprises Kelsale, Carlton, and the hamlets of East Green, North Green, Curlew Green and Dorley's Corner.

The B1121/Main Road cuts through the Parish and is the primary access road to Saxmundham. Kelsale Village is to the east of Main Road (B1121), the hamlet of North Green is to the north east and the hamlet of East Green is to the east. Carlton Village and the hamlet of Curlew Green are on the west side of the road (B1121). Dorley's Corner is near the junction of the A12.

The Sizewell Link Road will be built to the north of the Parish beginning at North Green and 'travelling' via Theberton and Middleton to Sizewell.

Saxmundham, the proposed site for up to FOUR (4) converter stations, acts as the primary 'service centre' to KcC with shops and two large grocery stores as well as many other useful services. Leiston, a village near the Sizewell C construction site, also provides services including a doctors' surgery, vet and grocery store especially to North Green and East Green residents in the north east of the Parish. Access to Leiston, however, has been made more challenging due to SZC changes to the road network. The Saxmundham doctors' surgery is located to the south of Clay Hills Road on the east side of the B1121 just north of Saxmundham which is where one of the alternatives for proposed new access roads to LionLink may be. The loss of the KcC Post Office in the Village Hall makes access to Saxmundham or Leiston, either by way of public or private transport, even more critical.

## **EIA Chapter 15 – Roads and Traffic**

The B1121 (Main Road) bisects KcC Parish. Increased traffic could effectively sever our community. Services are located on either side of the B1121. Those living on one side will have difficulty reaching the other side safely. For example, the Village Hall which houses the Social Club, the Church and the recreation ground is on the north side of the B1121. Residents on the south side may find it difficult to access these services. The knock-on effects on smaller roads in the Parish will also have a substantial negative impact on residents' lives on an everyday basis from getting children to school either by car or public transport (there is a bus stop on the B1121), shopping for necessities, accessing healthcare etc as described above. This topic is consequently of great importance to our residents and must be viewed not only with respect to LionLink, but also in relation to the NINE (9) TOTAL energy projects including Sizewell C, the largest construction project in Europe. Traffic and congestion is a material and significant issue and more information is required of traffic flow at peak periods.

1. Section 1.6.4 - At the outset of the SR, the area is characterised as 'rural'. This characterisation sets the tone for the rest of the SR, giving the impression that somehow 'rural' means that the roads are not well-used. It fails to mention the poor road network with mostly B roads and single-track roads that are not capable of handling large volumes of heavy traffic nor were they designed to do so. See Description of Proposed Onshore Scheme 1.6.4 – 'The proposed Onshore Scheme Scoping Boundary is located in a predominantly rural setting'.

2. Future Baseline – Section 15.3.71 to 15.3.76 – There is a real risk that the proposed methodology will substantially underestimate the cumulative impact of traffic on the B1121 and other local roads during the construction phase in an effort to avoid double-counting, and, therefore, it needs to be carefully scrutinised by the Planning Inspectorate. Peak times, rather than averages, need to be analysed, the hot spots identified and seasonal variation considered. Proper research needs to be done in advance given the substantial numbers already projected for Sizewell C. A full traffic study is crucial.

A task force of PC members and community leaders is being set up to establish a credited system for monitoring the traffic at peak times, during peak tourism seasons and continuously in order to collate baseline data at peak times and to examine the question: how will these main arterial routes be able to handle more traffic at peak times without endangering local members of the community, visitors and tourists as well as emergency services? What is the peak time? How many vehicles are passing a hot spot at a peak time? What type of vehicles?

3. Control Measures – Section 15.5.7 – 15.5.9 –

The geography of the Suffolk Coast and Heaths is central to an understanding of the road infrastructure and needs to be properly assessed. The region is home to many rivers and river estuaries: the Blyth, the Fromus, the Hundred, the Alde, the Butley, the Ore, the Deben, the Orwell and more. The arterial routes from the A12 to the coast are therefore limited in number, due to the estuaries and there are no long connecting roads which run in parallel with the shoreline closer to the coast than the A12, for that reason.

Many of the roads are in fact rural lanes, B roads with narrow space for passing vehicles and numerous pinch points. They were not designed for heavy industrialisation, access and use, but for rural life and a slower pace, ideal for scenic touring and cycling.

There is nothing mentioned in the control measures about co-coordinating with Sizewell C and other energy projects. A structure needs to be put in place that will mandate this. The LionLink CTMP must take a holistic view and not just focus on its specific vehicle numbers but rather the total numbers of ALL NINE (9) energy projects. This is a small area with a poorly served road network. There are no motorways and most roads including the A12 are not designed to cope with the amount of AILs, HGVs, LGVs needed to build all these projects along with the normal traffic from residents, workers and tourists. Chapter 29 assessing Cumulative Impact is inadequate and more work must be done.

4. Table 15.2

- AILs – there is no real justification for the proposed ‘scoping out’ of AILs other than that they will travel at non-peak times. This rationale is not robust. More information is needed. Many roads are not suitable for use by AILs and the use and number of AILs should not be scoped out just because they are not travelling at peak periods. In our Parish, having AILs travel down the B1121, even during non-peak times, will put other road-users in danger as there is already a problem with speed on this road. The accompanying noise and vibration will affect residents’ ability to enjoy the peace and quiet of the countryside and scheduling AILs at non-peak times will not mitigate the negative impact on ecology or biodiversity.
- Temporary congestion – the characterisation of congestion as ‘temporary’ is derisory and insulting as it minimises the effect of congestion which will take place over the course of several years and will have a real impact on communities and tourism

which is essential to the local economy. Further, this does not take into consideration the NINE (9) TOTAL energy projects and the timelines for those projects. As above, Chapter 29 does not do a proper assessment of cumulative impact.

- Public transport – as above which misrepresents and minimises the actual impact. For instance, the bus stop on the B1121 used by school children and vulnerable adults will be impacted over the years with the construction of the converter stations and the knock-on effects from Sizewell C.
- Cycling and pedestrians – as above, but with enhanced safety concerns. Cycling is not only a transport issue, but also related to tourism as many visit the area to cycle on scenic, un-congested and relatively flat roads. They are not expecting to share the road with construction traffic.

5. Assessment Methodology – Section 15.7 – More clarification is needed and a different approach taken. For example:

- 15.7.5 - There is no definition of 'development'. Does 'development' mean committed development as specified in 15.7.6? Also, why was 2028 chosen? What is the rationale? LionLink is proposed to start construction in 2026. What about potential development that is not committed? Would not the better approach, rather than choosing years, be to produce a year-by-year master timeline with the other projects included? A Gantt Chart is needed with all construction projects overlaid on it. This should have been in Chapter 29, but wherever it is placed, it needs to be produced.
- 15.7.7 – What is meant by 'overall construction'? Does this mean other energy projects? More clarification is needed.
- 15.7.8 – Mentions workers. Is there any coordination planned with Sizewell C for park and ride facilities for workers to lessen the impact on local roads? This potential needs to be included.

6. Legislation, Policy and Guidance

All local planning documents must be included. Much of KcC Parish is in a conservation area. See the boundary area below:

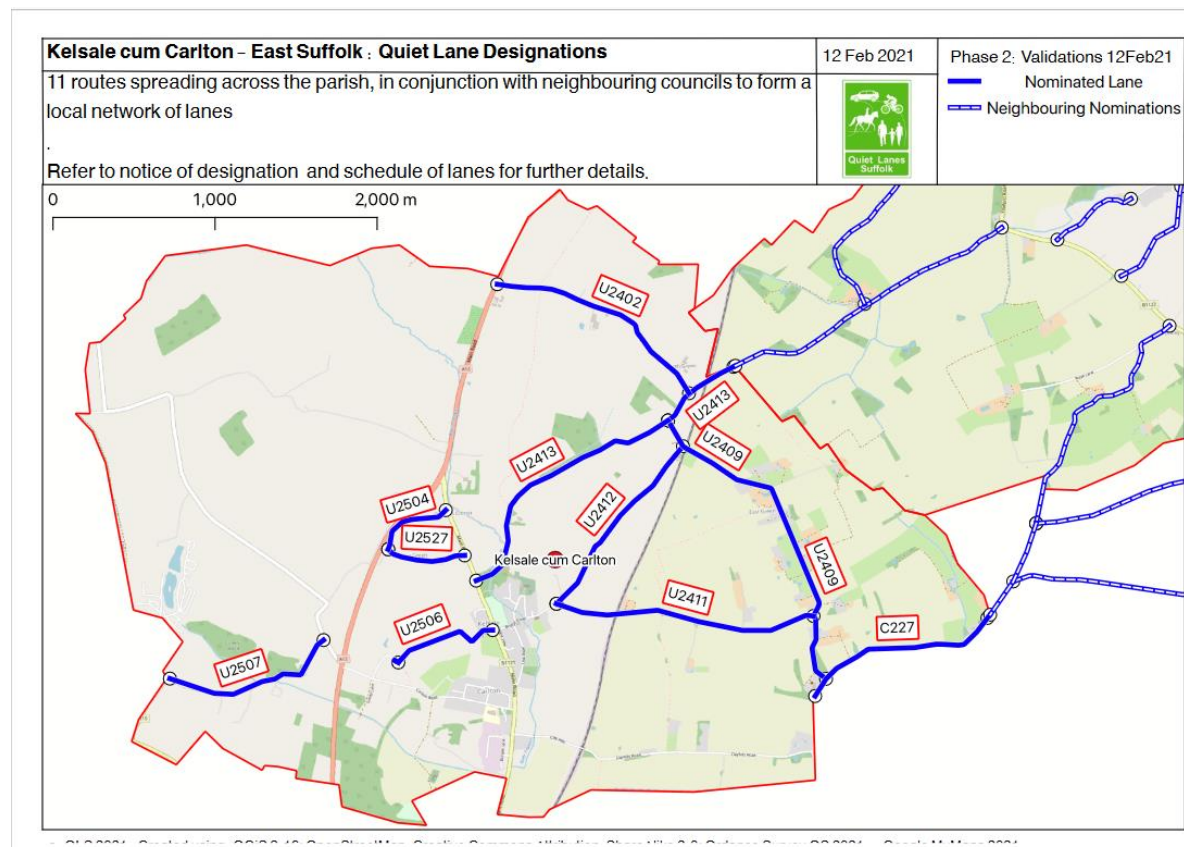


This information is missing and is necessary to further inform the EIA.



Additionally, there is a system of 'Quiet Lanes' in our parish. These have not been mentioned and are essential to form part of the EIA due to serious safety considerations. Quiet Lanes are single track, unpaved winding lanes on which (dog) walkers, riders (horse or cycle), joggers etc. co-exist with a very small quantity of motorised traffic which is highly respectful of these users. Construction traffic, either from self-routing or diversion, will put these vulnerable users in danger of grave harm and will destroy the tranquility of country life.

The Parish Council nominated Butchers Road, Curlew Green, Dorleys Corner, East Green, Theberton Road, Lowes Hill, North Green, Town Farm Road, Rendham Road, Tiggins Lane and Rosemary Lane as part of a Quiet Lanes network. The Quiet Lanes network also works with public rights of way, of which there are over 40 in the Parish.



## Chapter 29 – Cumulative Impact

This chapter focuses more on co-location and coordination rather than the overall effect NINE (9) TOTAL energy projects including Sizewell C, the largest construction project in Europe, will have on this small area in East Suffolk. This is not an accurate analysis of Cumulative Impact.

There is not a community in the country which is suffering the number, density and variety of energy projects. A Gantt Chart must be produced showing the impact not just of LionLink but the NINE TOTAL energy projects if the EIA truly wants to assess Cumulative Impact correctly.

1. Table 29-1 - Traffic and Transport is only listed in Table 29-1 as affecting Air Quality, Climate Change and Historic Environment. This assessment is woefully inadequate and misrepresents the true impact of increased traffic on the area. A surge in traffic and

transport will affect the Health and Well-being of residents especially those who are vulnerable as it further isolates those residents. It will affect Noise and Vibration as the massive number AILs, HGVs and LGVs rumble down our roads. Recreation and Tourism will most certainly be affected – data independently commissioned by the Destination Marketing Organisation (DMO) in 2019 has projected that 17-30% of tourists will choose to go elsewhere which will have a detrimental effect on the local economy amounting to a loss of £1 BILLION over the next 12-15 year. Biodiversity and Ecology will be negatively impacted as animals cannot travel safely around the area and their habitats will be destroyed. This table needs to be revisited as the analysis of Cumulative Impact has been cursory at best.

Whilst building materials for Sizewell C will be brought in by boat and rail as well as by road, and perhaps, for the converter stations at Saxmundham there is the possibility of rail, the sheer scale of these projects necessitates hundreds of lorries each day. The chronology of these projects is such that at least two National Grid or Scottish Power projects will be in process at the same time as SZC. SZC will increase the impacts on the road system in a dramatic way. At Hinkley Point, HGVs along the principal arterial road to the site rose from 470 HGVs per day in 2014 to 900 in 2018. In 2019, there were two HGVs passing every minute on rural roads close to the site. At least 700 HGVs are estimated for SZC and another 700 HGVs for the wind energy projects. In addition, there are coaches bringing in workers and trades working on these projects.

This is an inconvenient truth for the developers and there has been a good deal of obfuscation relating to the timetables of these schemes and, as a result, the cumulative impact has not been fully considered either by National Grid's LionLink or SeaLink. A Gantt Chart is needed.

2. Section 29.3.6 – It was suggested in Chapter 15, that the cumulative impact of traffic and transport will be addressed in Chapter 29, but this section effectively says that it will be addressed in Chapter 15. Circular logic! The cumulative impact of AILs, HGVs, LGVs and worker vehicles for all these projects needs to be properly assessed.

## **Alternatives Not Considered**

Many assumptions have been made in this EIA including the location of substations at Friston and converters at Saxmundham. Alternatives such as an offshore grid and the location of onshore infrastructure on brownfields sites closer to London where the power is needed have been ignored. This lack of robust analysis has the effect of destroying and industrialising the Heritage Coast forever. A full and fair appraisal of offshore alternatives and options for landfall on brownfield sites based on HND ('Holistic Network Design') principles using consultants who are independent of all current stakeholders for both LionLink, SeaLink and the other proposed transmission lines to the Suffolk coast must be produced. If alternatives are not analysed in a full and fair way, then the EIA cannot be complete. Scope this in.

## **Conclusion**

LionLink has not properly assessed the impact on communities such as KcC specifically with respect to the effect of traffic and transport. More work needs to be done to better inform the EIA especially with regard to cumulative impact. The Sizewell vehicle estimates have been published in its CTMP. SeaLink has published vehicle estimates in its CTMP. More than enough information exists to do a proper assessment. Traffic and Transport have far-reaching effects but especially

have real impact on the people who live in, work in and visit East Suffolk. It is important that the EIA properly examines these as well as alternatives or it cannot be considered a full and fair appraisal.



Maritime &  
Coastguard  
Agency

Helen Duncan  
**Maritime and Coastguard Agency**  
Bay 2/24  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

[www.gov.uk/mca](http://www.gov.uk/mca)

Your Ref: EN020033

Date: 28 March 2024

Via email: [lionlinkinterconnector@planninginspectorate.gov.uk](mailto:lionlinkinterconnector@planninginspectorate.gov.uk)

Dear Planning Inspectorate

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.**

**Application by National Grid LionLink Limited (the Applicant) for an Order granting Development Consent for LionLink (the Proposed Development).**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

Thank you for your letter dated 7 March 2024 inviting the Maritime and Coastguard Agency (MCA) to comment on the Scoping Report which will inform the Environmental Statement (ES) for LionLink.

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act 2009 before carrying out any marine licensable works.

We note the offshore elements of the proposed development including the offshore cable infrastructure which would continue beyond the UK EEZ, although this does not form part of the Proposed Development. We also note the onshore scheme which would pass under the Rivers Dunwich, Minsmere, Hundred, Blyth and Wang via trenchless crossings.

The proposed Offshore Scheme comprises:

- Two HVDC Submarine Cables; One dedicated metallic return (DMR) cable; Up to two fibre optic cables; and

- Associated external cable protection (e.g. rock berm, concrete mattresses) necessary where the required burial into the seabed cannot be achieved.

The Offshore Scheme would route from the Landfall across the Southern North Sea to the boundary between the UK and Netherlands EEZ. Within Dutch waters the HVDC Submarine Cables would connect to a Dutch Offshore Wind Farm (OWF).

We note the Scoping Report consists of several options for the cables which are the subject of further appraisal allowing flexibility to further refine the route throughout project development, as marine surveys and engineering activities are completed. The final target burial depth would be determined by a cable burial risk assessment which would take into consideration location specific factors such as ground conditions and intensity of shipping and fishing activity. The results of the cable burial risk assessment would be used to inform the ES, which we welcome.

The Scoping Report has been considered by representatives of UK Technical Services Navigation and we would like to comment as follows;

- 1) The development area carries a significant amount of through traffic, with a significant number of important international shipping routes in close proximity, including the Traffic Separation Schemes (TSS); Off Botney Ground TSS to the North of route B and the TSS Off Brown Ridge to the North East of route C. Although the exact route has not yet been finalised, the proposed offshore cable routes B and C pass through and nearby significant amount of through traffic to offshore wind farms, as well as cargo traffic and fishing activity. Attention needs to be paid to changes in vessel routing, particularly in heavy weather ensuring shipping can continue to make safe passage without large-scale deviations, and any reduction in navigable depth referenced to chart datum.
- 2) The Environmental Statement (ES) will consider the potential impacts of the construction, operation, maintenance and decommissioning phases of the proposed development and will follow the IMO Formal Safety Assessment methodology, which we welcome. The information from the Navigation Risk Assessment (NRA) will feed into the shipping and navigation chapter of the ES. The ES should supply detail on the possible impact on navigational issues for both commercial, fishing and recreational craft, specifically:
  - Collision Risk
  - Navigational Safety
  - Visual intrusion and noise
  - Risk Management and Emergency response
  - Marking and lighting of site and information to mariners
  - Effect on small craft navigational and communication equipment
  - The risk to drifting recreational craft in adverse weather or tidal conditions
  - The likely squeeze of small craft into the routes of larger commercial vessels.
- 3) The MCA welcomes the commitment in section 23-14 to undertake an NRA as an appendix to the ES shipping and navigation chapter including a baseline study which will summarise the navigational features, historical incident data, vessel activity including anchoring and

fishing activity in the vicinity of the selected Submarine Cable Corridor, and a constraints map which will include consideration of marine users and potential Unexploded Ordnance (UXO) to inform the choice of cable route.

The NRA should establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). The MCA would also welcome a hazard identification workshop to bring together relevant navigational stakeholders for the area to discuss the potential impacts on navigational safety associated with the proposed development. We note that 12 months of up-to-date AIS data, with complete coverage of the study area, for January and July 2023 have been selected to allow for consideration of seasonal variations in vessel traffic.

We also note the intention to follow the IMO Formal Safety Assessment (FSA) process which we welcome.

- 4) There are other works to facilitate the development including temporary construction compounds, drainage and access, and HDD under the so called "main rivers" if culverts are not used. It should be confirmed by the applicant whether there are any proposed works / activities undertaken below the Mean High-Water Spring within the Hundred River, River Minsmere, River Blyth and River Wang as a result of these aspects, which would impact on any other marine users for the selected locations.
- 5) Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. Where cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and at cable crossings where potential impacts on navigable water increase. Where this is not achievable, the applicant must discuss further with the MCA.

a . We note the intention for the cables to be buried along the total length of the route with the exception of crossings, with an intended burial depth of between 1 and 2m with a maximum depth of 3m. The Offshore Scheme would cross numerous existing in-service cables and pipelines. The cables would cross over existing infrastructure on a 'bridge' comprised of either aggregate or concrete mattresses or by making use of a separator system put around the cable at installation. This section would subsequently be covered over with a protective layer of either aggregate (rock) or concrete mattresses.

Where ground conditions prevent the full cable burial i.e., only partial or no burial is achieved, then there may be the need to install external cable protection. This can take the form of concrete mattresses, rock berms or rock bags.

As the design progresses, further assessments may be required in order to assess the subsea cables protection against shipping and fishing activities (anchoring and trawling). The MCA welcomes the development and review of the Cable Burial Risk Assessment (CBRA) mentioned in section 18.5.3 which will inform detailed

understanding of the burial details along the Offshore Cable Corridor in the ES. The CBRA should take into consideration location specific factors such as ground conditions (i.e., ability to bury), intensity of shipping and fishing activity. The MCA welcomes the marine survey campaign that would be undertaken prior to cable lay and burial.

6) We note the potential for a reduction of under keel clearance, which will be scoped into the assessment. It is expected a significant number of cable crossings will be required. Where the cable crosses in-service cables, whether buried or surface laid, a layer of separation in the form of rock berm or concrete mattresses may be installed over the crossed asset. The cable would then also require protection in the form of a post-lay rock berm. The height of the concrete mattress and rock berm above the seabed is currently not specified.

a. Safe realistic under keel clearance (UKC) assessment should be undertaken for the maximum drafts of vessel both observed and anticipated. The MCA's Under Keel Clearance Policy paper can be found at the following link: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/373456/Under\\_Keel\\_Clearance\\_paper\\_May\\_14\\_-\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/373456/Under_Keel_Clearance_paper_May_14_-_FINAL.pdf)

7) A study should be undertaken to establish the electromagnetic deviation, affecting ship compasses and other navigating systems, of the high voltage cable route to the satisfaction of the MCA. On receipt of the study, the MCA reserves the right to request a deviation survey of the cable route post installation. There must be no more than a 3-degree electromagnetic compass deviation for 95% of the cable route and for the remaining 5% of the cable route there must be no more than a 5 degree electromagnetic compass deviation. If the MCA requirement cannot be met, a post installation actual electromagnetic compass deviation survey should be conducted for the cable in areas where compliance has not been achieved. We note this has been scoped in (section 23.7.0) of the project which we welcome.

8) Finally, we note that there are no potential impacts on shipping and navigation that have been scoped out for the ES, which the MCA welcomes. The MCA will of course provide full consideration of the detailed proposals, along with the supporting Navigation Risk Assessment which may highlight further areas for consideration and risk mitigation measures.

We further note that the MCA will be consulted for the Major Accidents and disasters section of the ES.

We hope you find this useful at Scoping Report stage.

Yours faithfully



Helen Duncan  
Marine Licensing Project Lead  
UK Technical Services Navigation

# LionLink Consultation on the Environmental Impact Assessment (EIA) Scoping Report

*Response by Middleton cum Fordley Parish Council (MPC)*

## Introduction

MPC makes these comments without prejudice to its intention to continue to oppose the routing of HVAC cables through our Parish, as set out in our November 2023 consultation response.

## Ecology and biodiversity

We note that the listing of designated County Wildlife Sites in Table 8.4 includes two entries for sites in or near Middleton Parish. These are the sections of the Minsmere Valley respectively east and west of Reckford Bridge. The section west of Reckford Bridge, which from just west of our village centre is within the proposed cable corridor, is described in Table 8.4 as an *“Extensive area of unimproved marsh supporting rare flora and a number of productive barn owl nest sites. The site is also frequented by otters.”*

We consider this statement should be amended to also refer to rare invertebrate species. This (unpublished) map in the Appendix confirms the Minsmere Valley as an important invertebrate area.

We also note with concern that there is no corresponding listing of non-designated wildlife sites in the scoping document.

In our opinion such a listing should be compiled based on consultation with local Councils and, in the case of our Parish should include at least the following sites.

1	The water course and wetland area within the scoping boundary bounded in the south by Mill Street and in the north by the Causeway	This includes habitats similar to those found in the Minsmere Valley including pasture, reedbeds and woodland.
2	Middleton Moor comprising land within the scoping boundary to the north of the B1122 and just outside the boundary on the south side of the B1122. Middleton Moor is managed by MPC under a stewardship agreement with English Nature.	This is rare example of lowland meadow which supports a large diversity of flora, birds and invertebrates. The pond on the south side is an important breeding site for Great Crested Newts. Furthermore, the tussocky



		grass and the boundary hedges are also part of the supporting habitat for the newts.
--	--	--

With respect to the cable routes crossing the Minsmere Valley we request that serious consideration be given to using trenchless methods given the acknowledged ecological sensitivity of these areas.

## Roads and access during construction

We note that construction may require new temporary access routes to be constructed. Given the ecological sensitivity of much of the land in the part of the cable corridor crossing non-arable land within our Parish, we would request that where possible access routes through these areas be avoided and that the choice of such routes should be subject to specific environmental impact assessments.

We also note that access to construction sites may require the passage of HGVs along narrow single carriageway roads. We request that the EIA include methodology to assess the impacts of such routing on access by our residents and visitors. If necessary, we request that provision be made for the improvement of passing places and the better provision of refuges for pedestrians using these roads, which do not generally have footways.

## Cumulative impacts

We note that the chapter on Cumulative Impacts does not specifically mention the likely concurrence of your project with the construction of Sizewell C, should that go ahead.

Our Parish will be subject to major disruption by traffic accessing the SZC site in the early years of that project and the construction of the Sizewell Link Road.

We request that the EIA set out a detailed method for assessing the impact on our roads of the two projects, including protocols to avoid clashing road closures.

## Causeway Farm

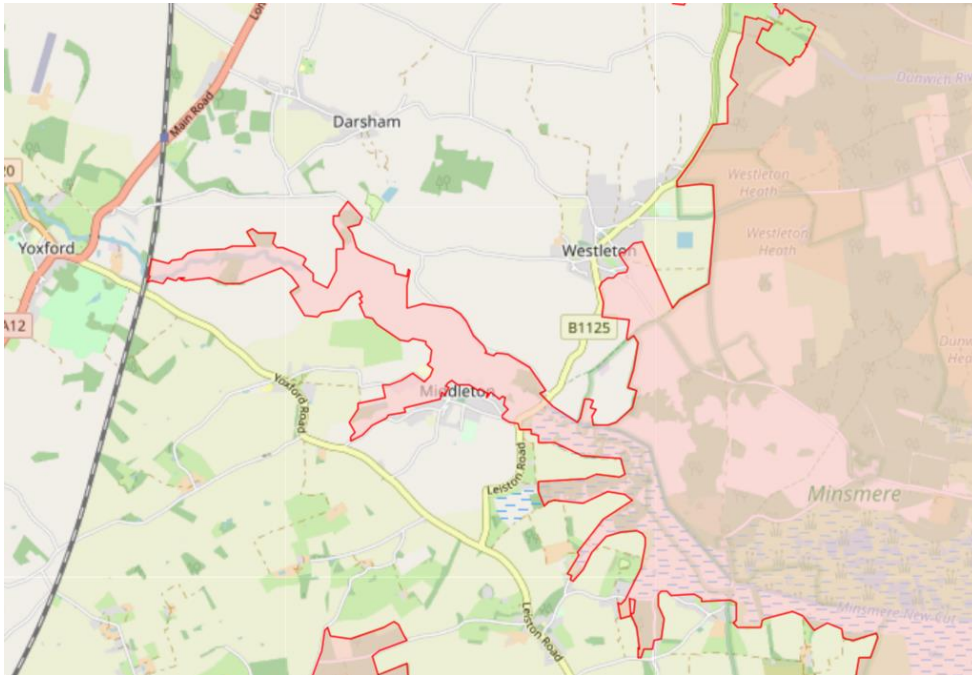
Part of the cable corridor passes through Causeway Farm which is a Suffolk County Council County Farm. This property is about to undergo changes as a result of the ending of the existing tenancy in October 2024. SCC is consulting MPC on the future of this land and the MPC is planning to request that additional (permissive) footpaths be provided to improve opportunities for exercise and access to green spaces, including the Minsmere River Valley. It is also possible that the land may be developed in other ways.

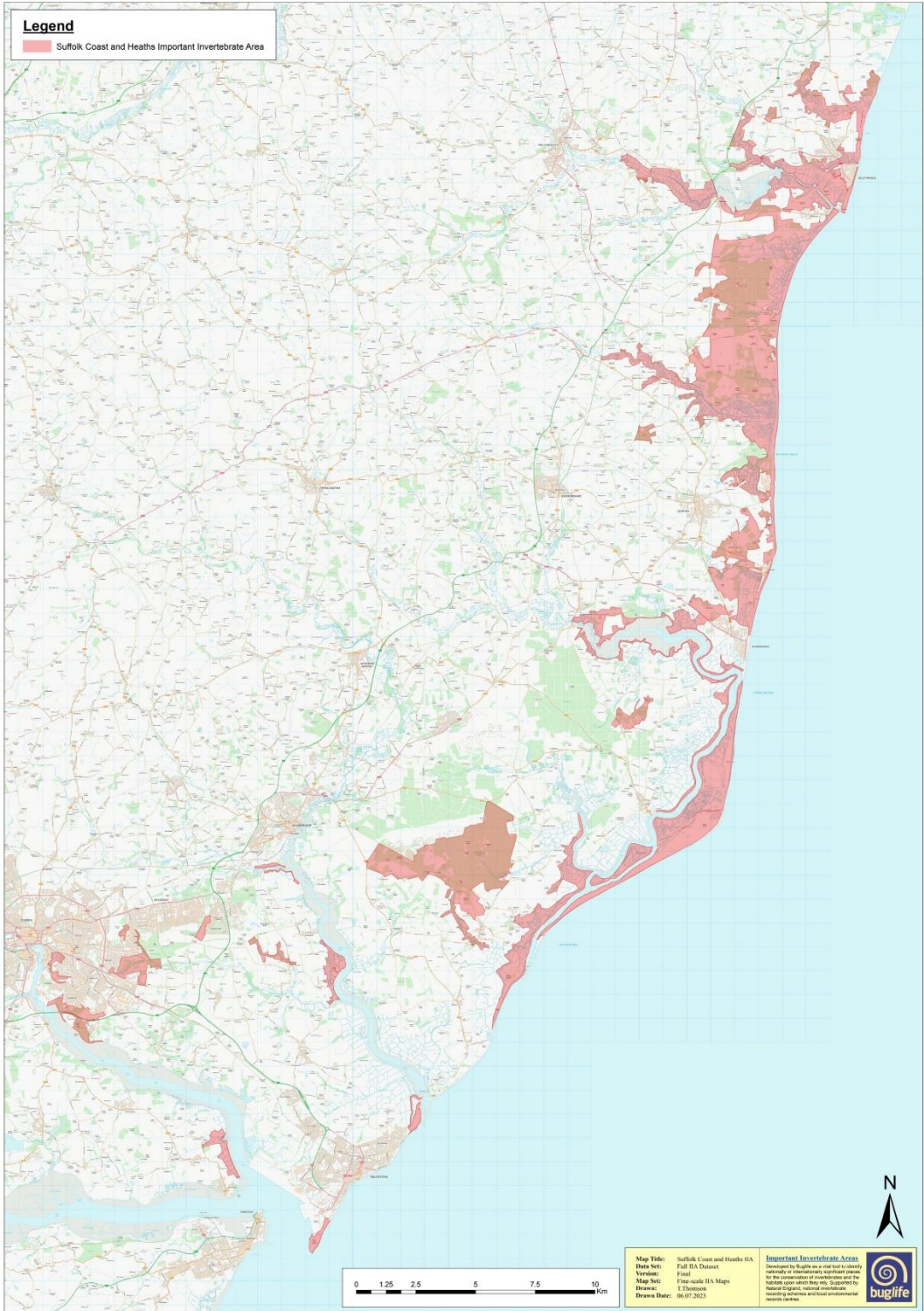
We therefore request that the scope of the EIA be expanded to include an assessment of the impact of potential land use changes at Causeway Farm.

Julian Cusack  
 Chair, Middleton cum Fordley Parish Council  
 26 March 2024

## Appendix: Important invertebrate sites, Suffolk Coast and Heaths

The map is produced by the charity Buglife (after consultation with SBIS and local invertebrate recorders)





**Legend**  
 Suffolk Coast and Heaths Important Invertebrate Area



Map Title: Suffolk Coast and Heaths IIA  
 Date Set: Full IIA Dataset  
 Version: Final  
 Map Set: Full-scale IIA Maps  
 Drawn: T. Thompson  
 Drawn Date: 06.07.2023

**Important Invertebrate Areas**  
 Designated by Buglife as a site that is either nationally or internationally significant places for the conservation of invertebrates and the habitats upon which they rely. Supported by Natural England, national invertebrate recording schemes and local environmental records centres.



---

**From:** White, Andrew E1 (DIO Estates-SafegdGOffr2) [REDACTED]  
**Sent:** 08 March 2024 13:48  
**To:** Lionlink Interconnector  
**Subject:** 20240308 - MOD Response - EN020033 - LionLink - EIA Scoping Notification and Consultation - DIO10061970

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Thank you for consulting the MOD regarding the Scoping Opinion request for the LionLink. The project comprises a new interconnector with a capacity of up to 1.8 gigawatts (GW) between the National Transmission Systems (NTSs) of Great Britain (GB) and the Netherlands, including a connection into a wind farm located in Dutch waters.

At this stage of the project, there is a lack of specific detail, in particular, coordinates, which assist MOD in plotting the cable route.

At this stage the MOD has no concerns regarding the offshore element of this activity, there do not appear to be any Military Practice or Training Areas within the study area, however, please note, there are other defence interests in the locality relating to navigational interests that are not defined in the public domain. The MOD will be able to provide specific advice, as may be necessary, on the proposed cable installation when more detailed information becomes available.

Regarding the onshore section, a proposed Landfall at either Southwold or Walberswick and cable route towards Friston Substation has been assessed as a SOSA (Site Outside Safeguarding Areas) as far as MOD interests are concerned, however, the MOD requests to be included in any consultation when more detailed information becomes available.

Regards,

Andy

Andy White | Assistant Safeguarding Manager  
Defence Infrastructure Organisation  
Estates | Safeguarding  
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY  
MODNET: [REDACTED]

Working days; Monday to Friday 07:00 – 15:00.

---

**From:** .Box.Assetprotection (National Gas) <box.assetprotection@nationalgas.com>  
**Sent:** 11 March 2024 13:49  
**To:** Lionlink Interconnector  
**Subject:** FW: [EXTERNAL] EN020033 - LionLink - EIA Scoping Notification and Consultation  
**Attachments:** LION - Statutory Consultation Letter.pdf

You don't often get email from box.assetprotection@nationalgas.com. [Learn why this is important](#)

Good Afternoon,

Thank you for your email.

Regarding planning application EN020033 - LionLink there are no National Gas assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with [www.lsbud.co.uk](http://www.lsbud.co.uk). Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

**Hayley White**  
Asset Protection Assistant

+44 (0) [REDACTED]  
[REDACTED]



National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA  
[nationalgas.com](http://nationalgas.com) | [Twitter](#) | [LinkedIn](#)

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---

**From:** Lionlink Interconnector <LionlinkInterconnector@planninginspectorate.gov.uk>  
**Sent:** 07 March 2024 11:24  
**To:** .Box.Assetprotection (National Gas) <box.assetprotection@grid.nationalgas.com>  
**Cc:** Kamille Liddar (National Gas) [REDACTED]  
**Subject:** [EXTERNAL] EN020033 - LionLink - EIA Scoping Notification and Consultation

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Dear Sir/Madam,

Please see attached correspondence on the proposed LionLink.

Please note the deadline for consultation responses is **04 April 2024**, which is a statutory requirement that cannot be extended.

Kind regards,

Jack Patten



The Planning  
Inspectorate

**Jack Patten** (He/Him)  
EIA Advisor  
The Planning Inspectorate



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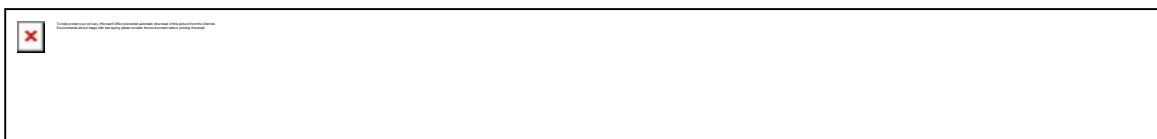
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For the registered information on National Gas Transmission please use the attached link:  
<https://nationalgas.com/about-us/corporate-registrations>.

Date: 4 April 2024  
Our ref: Case 26968 469116  
Your ref: EN020033 LionLink EIA Scoping



Planning Inspectorate  
Environmental Services  
Operations Group 3  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

**BY EMAIL ONLY**

Dear Planning Inspectorate,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by National Grid Ventures, trading as National Grid Ventures (the ‘Applicant’) for an Order granting Development Consent for the LionLink Multipurpose Interconnector (the Proposed Development)**

**Scoping consultation and notification of the Applicant’s contact details**

Thank you for your letter dated 07 March 2024 consulting Natural England on the LionLink Multipurpose Interconnector Project Environmental Impact Assessment (EIA) Scoping Report. The following constitutes Natural England’s formal statutory response; however, this is without prejudice to any comments we may wish to make in light of further submissions or the presentation of additional information.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles).

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. **Annex A** to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for this development. Further general guidance on EIA is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

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<sup>1</sup> *Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)*

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/>*



In **Annex B** we provide detailed comments on the project-specific aspects of the scoping report. The key issues raised in Annex B are summarised below.

## **Summary of Main Points**

### **1. Approach to scoping**

It is noted that due to the timing of the scoping report, the information contained within it is extremely high level and based on a large area of search. The rationale for the inclusion of these large boundaries is due to substantial components of the projects remaining undetermined at the point of scoping, but also other aspects including incomplete data collection.

This makes it difficult to provide targeted advice on the scope of the assessments at this stage. Given the EIA scoping opinion from PINS is binding as regards the scope of the Environmental Statement (ES), this creates potential consenting risks further down the line with identifying and resolving environmental impacts/concerns.

Additionally, we highlight that because we are unable to confirm that the data collection proposed will be sufficient to inform the assessments, we are also unable to advise on the potential scale and level of risk this project may pose to nature conservation receptors. Without having this understanding, it is unclear to Natural England how this project will now progress towards submission and ensure that there is sufficient time in the pre-application phase to identify and address all of the potential environmental concerns. It is important that any Section 42 consultation is not conducted until the project is considerably more refined, otherwise it will again not be possible to provide authoritative advice.

### **2. Focus of the Scoping Report**

When scoping a project, developers should satisfy themselves that they have addressed all the potential impacts and the concerns of all organisations and individuals with an interest in the project. Due to the capacious scoping envelope, it is challenging to scope impacts out at this stage and therefore difficult for Natural England to comment meaningfully. Further consideration is likely needed in relation to the cable corridor and need for further scoping or ongoing discussions. However, due the timing of the EIA scoping consultation we have focused our advice on the known issues of greatest importance/risk taking into account the likelihood of significant effects on the environment.

In these scenarios we also advise that the focus of the EIA consultation should be on the baseline characterisation survey methodology and approach to the assessment, as unfortunately there is insufficient evidence presented to enable us to agree impacts being scoped out.

Through our review Natural England has advised that several impacts have been scoped out which should be scoped in. Please see our detailed comments within Annex B for details.

### **3. Wider Marine Environment Impacts vs. Impacts to designated site features.**

Natural England is concerned that the sections of the scoping document covering Designated Sites, Marine Processes, Intertidal and Subtidal Ecology and Fish and Shellfish are not suitably aligned. We believe that there are impacts potentially being scoped out without regard to whether the receiving habitat / species is the feature of a designated site and/or supporting habitat for mobile features. It is Natural England's view that where a feature of a site, such as a broadscale habitat, has a clear impact pathway then it should be scoped into full assessment

at the Preliminary Environmental Information Report (PEIR) and EIA stages. Natural England's Advice on Operations for each designated site within the cable route corridor and Zone of Influence (Zoi) give a clear, high-level view of what we consider sensitive to various activities. The Advice on Operations should be read in conjunction with the Supplementary Advice on Conservation Objectives (SACOs), which set out the key attributes for the feature in question.

Further project specific detail on the scoping considerations can be found in Annex B of this response.

#### 4. Transmission assets

Natural England notes that the Applicant acknowledges that the scoping report only considers the infrastructure required for the Project's grid connection, and not any interconnectivity that may be required as a result of the recommended coordinated approach for the East Coast Region outlined in the National Grid Electricity System Operator (ESO)'s Holistic Network Design (HND). However, if circumstances should change and a more coordinated/joined up approach for energy transmission for multiple NSIP projects is taken forward; we advise that thorough consideration will need to be given to consenting implications from infrastructure and interdependency and assessing in-combination/cumulative impacts. All of which may have implications for project timelines.

#### 5. Impacts to designated sites

Natural England notes that one of the project's landfall locations is likely to result in a cable route through the Minsmere-Walberswick Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Ramsar and Special Protection Area (SPA) designated sites. The scoping has focused on the use of horizontal directional drilling (HDD) through these sites to minimise impacts. While Natural England generally supports the use of HDD to avoid impacts to designated sites, we also note that HDD has failed on other projects and advises that sufficient geotechnical information should be gathered and presented alongside the Environmental Statement to clearly demonstrate that it is viable in these locations.

We note that offshore the cable route passes through the Outer Thames Estuary SPA and the Southern North Sea SAC. A key mitigation for the Outer Thames Estuary SPA would be a restriction on offshore cable work between 1 November and 31 March each year due to the sensitivity of red-throated diver to disturbance/displacement at this time. While noise-related impacts from UXO removal may be of a concern with regard to the Southern North Sea SAC. More detailed comments are provided in Annex B.

#### 6. Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards

Natural England has been leading the 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' project, funded by Defra's Offshore Wind Enabling Actions Programme (OWEAP).

The project is providing up-front best practice advice on the way data and evidence is used to support offshore wind farm development and consenting in English waters, focussing on the key ecological receptors which pose a consenting risk for projects, namely seabirds, marine mammals, seafloor habitats and species and fish.

The project aims to facilitate the sustainable development of low impact offshore wind by increasing clarity for industry, regulators and other stakeholders over data and evidence requirements at each stage of offshore wind development, from pre-application through to post-consent.

However, we advise that this best practice guidance is also applicable to other marine major casework, such as interconnector cables. The LionLink application should be fully informed by the relevant recommendations in the Best Practice Advice, and we will increasingly be appraising applications with respect to the extent to which the guidance has been followed.

In addition, we refer the applicant to our Cabling Lessons Learnt guidance, which we can provide upon request.

The advice documents are currently stored on a SharePoint Online site, access to the SharePoint site needs to be requested from [neoffshorewindstrategicsolutions@naturalengland.org.uk](mailto:neoffshorewindstrategicsolutions@naturalengland.org.uk). Please allow up to three working days for requests to access the site to be granted. Natural England is currently reviewing ways of making the advice more accessible and open access.

Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

For any queries relating to the specific advice in this letter please contact us using the details below.

Yours sincerely,

Sophie Sparrow  
Marine Lead Adviser  
Norfolk Coast & Marine Team  
E-mail: [REDACTED]  
Telephone: + [REDACTED]

## **Annex A – Advice related to Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 / Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (Regulation 10) sets out the necessary information to assess impacts on the natural environment to be included in an Environmental Statement (ES), specifically:

- A description of the development – including physical characteristics and the full marine use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape/seascape, and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects.
- Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure and activities should be included within the assessment.

Natural England’s advice on the scope and content of the Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The [National Planning Policy Framework \(NPPF\)](#) sets out guidance on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

## **2.2 Use of EIA Matrices**

Natural England notes that the approach to the assessment is proposed to align with EIA approaches used on other projects. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances in ESs where significance has been presented as a range (i.e. slight, or moderate, or large) and it is nearly always the lower value that has been taken forward. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features are not incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach.

## **2.3 Impact Risk Zones**

Natural England advises that scoping area should be based on the potential for species to be present within the area, the Impact Risk Zones (IRZ) for designated sites as available on Magic, and the ecology of species of concern e.g. foraging areas of designated species of sites in proximity to the proposed development area.

## **2.4 Internationally designated Sites – Special Protection Areas (SPAs) and Special Areas of Conservations (SACs)**

The application documents should thoroughly assess the potential for the proposal to affect designated sites. Internationally designated sites (e.g. designated Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition, paragraph 181 of the National Planning Policy Framework requires that potential SPAs, possible SACs, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential, or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) and Regulation 28 of the Conservation of Offshore Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Further information on the special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/> and for sites beyond 12 nautical miles the Joint Nature Conservation Committee (JNCC) website [About Marine Protected Areas | JNCC - Adviser to Government on Nature Conservation](#).

If during the EIA/Application process the potential for a Likely Significant Effect on the conservation objectives of the sites cannot be ruled out the competent authority should undertake an Appropriate Assessment of the implications for the site in view of its

conservation objectives. Noting recent case law (*People Over Wind*<sup>3</sup>) measures intended to avoid and/or reduce the likely harmful effects on an internationally designated sites cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site, therefore consideration is required at Appropriate Assessment. Natural England wishes to be consulted on the scope of the Habitats Regulations Assessment and the information that will be produced to support it and should be formally consulted on any Appropriate Assessment provided for the proposal (Regulation 63/28).

The consideration of Likely Significant Effects should include any functionally linked habitat outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically. Further guidance is set out in Planning Practice Guidance on appropriate assessment here:

<https://www.gov.uk/guidance/appropriate-assessment>

The Project's cable corridor overlaps with the following designated nature conservation sites:

- Minsmere-Walberswick Ramsar site
- Minsmere-Walberswick SPA
- Minsmere-Walberswick Heaths and Marshes SAC
- Outer Thames Estuary SPA
- Southern North Sea SAC

The application documents should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects to acceptable levels.

## **2.5 Marine Conservation Zones (MCZs), Highly Protected Marine Areas (HPMAs) and Sites of Special Scientific Interest**

### **Marine Conservation Zones (MCZs)**

Marine Conservation Zones are areas that protect a range of nationally important, rare, or threatened habitats and species. You can see where MCZs are located and their special interest features on [www.magic.gov.uk](http://www.magic.gov.uk). Factsheets that establish the purpose of designation and conservation objectives for each of the MCZ's are available at <https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england>

The red line boundary of the Project does not fall within or adjacent to any MCZ, however the assessment should consider the potential for indirect impacts. The ES should therefore consider including information on the impacts of this development on MCZ interest features. Further information on the special interest features, the conservation objectives, and relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/>

**Please note:** As there is only an area of search for the cable corridor at this stage, we are unable to provide a definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

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<sup>3</sup> *People Over Wind and Sweetman vs Coillte Teoranta* (ref: C 323/17).

## Highly Protected Marine Areas (HPMAs)

The red line boundary of the Project does not fall within or adjacent to any HPMA.

Further information on the location of HPMAs can be found at [Highly Protected Marine Areas \(HPMAs\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/highly-protected-marine-areas). The ES should include a full assessment of the direct and indirect effects of the development on the features of any candidate HPMA and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects.

## Sites of Special Scientific Interest (SSSIs)

The Project's cable corridor intersects with the Minsmere-Walberswick Heaths and Marshes SSSI and Pakefield to Easton Bavents SSSI.

Further information on the location of SSSIs and their special interest features can be found at [www.magic.gov.uk](http://www.magic.gov.uk). The application should include a full assessment of the direct and indirect effects of the development on the features of special scientific interest and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects.

**Please note:** As there is only an area of search for the cable corridor at this stage, we are unable to provide an definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

## 2.5 Regionally and Locally Important Sites

The EIA/Application will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The ES should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust(s), geoconservation group(s) or local sites body in onshore areas of search for further information.

## 2.6 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES/Application should assess the impact of all phases of the proposal on protected species (including, for example, pinnipeds (seals), cetaceans (including dolphins, porpoises, and whales), fish (including seahorses, sharks, and skates), marine turtles, birds, marine invertebrates and bats). Information on the relevant legislation protecting marine species can be reviewed on the following link <https://www.gov.uk/government/publications/protected-marine-species>.

Natural England does not hold comprehensive information regarding the locations of species protected by law but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, [NBN Atlas](https://www.nbn.org.uk/), groups, and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#). The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information, there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for terrestrial protected species which includes links to guidance on survey and mitigation. All other information on protected species can be found in 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards'

## **2.7 Habitats and Species of Principal Importance**

The ES/Application should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity> .

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a terrestrial habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats, present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g., from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g., whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek, if possible, to avoid adverse impact on sensitive areas for wildlife within the site, and if possible, provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.



## 2.8 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## 3. Designated Landscapes and Landscape/Seascape Character

### 3.1 Nationally Designated Landscapes

Consideration should be given to any potential direct or indirect impacts to the special qualities of designated landscapes, and the mitigation hierarchy deployed to reduce impacts to acceptable levels. We also highlight that Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 ('LURA') places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty ("National Landscape") in England, to seek to further the statutory purposes of the area. Developers should set out how they can assist decision-makers in carrying out this enhanced duty.

**Please note:** As there is only an area of search for the cable corridor at this stage, we are unable to provide definitive advice on specific designated landscapes at this time. However, we do note that the setting of the Suffolk Coast and Heaths National Landscape/Area of Outstanding Natural Beauty may require further consideration once the final cable corridor is confirmed.

### 3.2 Landscape/Seascape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site, as well as any relevant management plans or strategies pertaining to the area. The EIA/Application should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA/Application should include a full assessment of the potential impacts of the development on local landscape character using [landscape/seascape assessment methodologies](#). We encourage the use of Landscape and Seascape Character Assessment (LCA/SCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA/SCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment. For National Parks and National Landscapes/Areas of Outstanding Natural Beauty (AONBs), we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

In order to foster high quality development that respects, maintains, or enhances, local landscape / seascape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescales of their progress through the planning system, the cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape / Seascape Character Assessment at a local level are also available on the same page. The Marine Management Organisation (MMO) has also produced regional character assessments for seascapes, see: <https://www.gov.uk/government/publications/seascape-assessments-for-north-east-north-west-south-east-south-west-marine-plan-areas-mmo1134> and <https://data.gov.uk/dataset/3fed3362-2279-4645-8aaf-c6b431c94485/mmo1037-marine-character-areas>

#### **4. Terrestrial Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green/blue infrastructure. Relevant aspects of local authority green/blue infrastructure strategies should be incorporated where appropriate.

##### **4.1 England Coast Path**

The England Coast Path (ECP) is a new National Trail that will extend around all of England's coast with an associated margin of land predominantly seawards of this, for the public to access and enjoy. We would encourage any proposed development to include appropriate provision for the England Coast Path to maximise the benefits this can bring to the area. We suggest that the development includes provision for a walking or multi-user route, where practicable and safe. This should not be to the detriment of nature conservation, historic environment, landscape character or affect natural coastal change. Consideration for how best this could be achieved should be made within the Environmental Statement.

As part of the development of the ECP a 'coastal margin' is being identified. The margin includes all land between the trail and the sea. It may also extend inland from the trail if:

- it's a type of coastal land identified in the Countryside and Rights of Way Act 2000 (CROW Act), such as beach, dune, or cliff
- there are existing access rights under section 15 of the CROW Act
- Natural England and the landowner agree to follow a clear physical feature landward of the trail

Maps for sections of the ECP and further proposals for adoption are available here: <https://www.gov.uk/government/collections/england-coast-path-improving-public-access-to-the-coast>

## **4.2 Rights of Way, Access land, Coastal access, and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **5. Water Quality**

Increases in suspended sediment concentrations (SSC) during construction and operation (e.g., future dredging works) have the potential to smother sensitive habitats. The ES/Application should include information on the sediment quality and potential for any effects on water quality through suspension of contaminated sediments. The EIA/Application should also consider whether increased suspended sediment concentrations resulting are likely to impact upon the interest features and supporting habitats of the designated sites as listed above.

The ES/application should consider whether there will be an increase in the pollution risk as a result of the construction or operation of the development.

For activities in the marine environment up to 1 nautical mile out at sea, a Water Framework Directive (WFD) assessment is required as part of any application. The ES should draw upon and report on the WFD assessment considering the impact the proposed activity may have on the immediate water body and any linked water bodies. Further guidance on WFD assessments is available here: <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example, over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water, and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## 7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES/Application should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 180(d)), which should be demonstrated through the ES/Application.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

## 8. Contribution to local environmental initiatives and priorities

Due to the lack of detail available at this stage, Natural England is unable to provide any information on how this development fits with local initiatives and priorities such as the delivery of green/blue infrastructure, biodiversity opportunity areas or biodiversity enhancements.

## 9. Cumulative and in-combination effects

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the Application. All supporting infrastructure and activities should be included within the assessment.

The ES/Application should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e., projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England's advice on the scope and content of an Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/> . We advise that all Applications use this as a template.

## 10. Use of the Rochdale Envelope

Natural England recognises the need to use a Rochdale Envelope approach to allow flexibility in project design to ensure that changes in available technologies and project

economics can be considered post consent. However, Natural England has concerns over the extent to which uncertainty in ground conditions is driving the extent of the project envelope, and that the Rochdale Envelope approach is resulting in the provision of insufficient baseline information to inform both project design and assessment of impacts. The lack of understanding of the ground conditions results in the use of Maximum Design Scenarios (MDSs) that are conservative enough to make up for that lack of understanding and allow for all eventualities. This in turn translates into a vast number of variables, causing difficulties in assessment, as it is difficult to identify and assess a realistic worst-case scenario for each of the relevant receptors with any certainty, which in turn necessitates precautionary assessments. That presents challenges when it comes to identifying appropriate mitigation measures.

### **11. Ecological join up between marine receptor assessments**

Natural England advises that changes to marine processes and benthic ecology could cause an indirect impact on mobile interest features from designated sites through changes to supporting habitats and prey availability. Ecosystem impacts should be thoroughly considered within the relevant receptor chapters throughout the ES/Application documents and draw on the information provided in designated site SACOs.

### **12. Landfall**

Coastal environments are subject to considerable historic and future change. Therefore, should trenchless techniques be considered then a feasibility study informed by geotechnical investigations will be required, particularly within the boundary of a designated site. We would also advise that the Applicant should consider how the coast may alter throughout the lifetime of the project, both in terms of vertical change in beach profile and coastal retreat. In other words, how will cable burial and siting of infrastructure be sustainably managed throughout the lifespan of the project?

We advise that the landfall assessment also needs to consider the effects on the hydrodynamic regime due to the presence of cable protection, equipment such as jack-up rigs, cable-laying vessels and cofferdams etc. Plus the potential impact of intertidal access and/or vehicle traffic on foreshore profile change or cliff erosion over all phases of the project.

### **13. Cable protection – including secondary scour**

Natural England's position provided for Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas in relation to Adverse Effects on Integrity from the placement of cable protection within benthic MPAs remains unchanged, and therefore cable protection within marine protected areas should be avoided. Where that is not possible every effort should be made to avoid, reduce and mitigate the impacts. In order to achieve this, we advise that a cable burial risk assessment is undertaken as part of the application process informed by comprehensive geotechnical and geophysical surveys. If cable protection is required options that have the greatest success of removal with least impact to interest features should be taken forward. A site integrity plan could then be used to determine the risk to the conservation objectives for the site and determine the requirements for any compensatory measures.

Please note that impacts from secondary scouring around cable protection should also be factored into both marine processes and benthic assessments.

#### **14. Marine Mammals impact assessments**

If not already considered we advise Applicants to include reference to the following

- IAMMWG. 2022. *Updated abundance estimates for cetacean Management Units in UK waters (Revised 2022)* <https://hub.incc.gov.uk/assets/3a401204-aa46-43c8-85b8-5ae42cdd7ff3>
- *Scientific Advice on Matters Related to the Management of Seal Populations: 2021* <http://www.smru.st-andrews.ac.uk/files/2022/08/SCOS-2021.pdf>
- *Carter et al. (2022)* <https://www.frontiersin.org/articles/10.3389/fmars.2022.875869/full>

#### **15. Red Throated Divers**

Natural England highlights our increasing concerns in relation to disturbance and/or displacement of red-throated divers features from the more persistent presence of offshore wind farm, energy and oil and gas related vessel activity which could make a meaningful contribution to in-combination effects to the Outer Thames Estuary SPA. As such, we advise appropriate consideration of both seasonal timing of construction and O&M works and vessel transit route is included within the application.

Natural England recommends that where possible, any construction and operations and maintenance (O&M) activities avoid the months of November to March inclusive. Vessel transit routes outside of existing navigation routes through the Outer Thames Estuary SPA, depending on the port of origin, should also be avoided during these winter months.

For less impactful developments, Natural England advises as minimum use of best practice measures between 1<sup>st</sup> November and 31<sup>st</sup> March to mitigate and therefore minimise disturbance to red-throated diver namely:

- Selecting routes (when transiting to site) that avoid aggregations of red-throated diver and common scoter, where practicable.
- Restricting (to the extent possible) vessel movements when transiting to the site to existing navigation routes (where the densities of divers are typically relatively low).
- Avoidance of over-revving of engines (to minimise noise disturbance); and
- Briefing of vessel crew on the purpose and implications of these vessel management practices (through, for example, tool-box talks).

However, we do highlight that dependent on the level of proposed activity across the designated site the best practice protocol as set out above may not minimise the in-combination impacts to an acceptable level, and therefore a full seasonal restriction could be required.

#### **16. Biodiversity Net Gain**

Whilst we are currently in the transition phase with requirements for Biodiversity Net Gain (BNG) delivery becoming mandatory for Nationally Significant Infrastructure Projects (NSIPs), Natural England strongly advises that the project engages with this at an early stage to maximise positive environmental impact and in order to ensure the project is future proofed.

We advise that the sooner net gain is implemented, the sooner habitats can establish. BNG calculations should be made using the most recent Metric (Metric 3.1 at present).

### **17. Outline Plans**

Natural England advises that outline documents and/or assessment will need to be included in the Application to ensure that all impacts have been considered and appropriately managed.

**Annex B: Detailed Comments**

**Structure/Framework for Natural England advice in relation to risk and potential to resolve -**

- **Red:** Natural England considers these issues to be showstoppers i.e., unless baseline data; significant design changes; and/or significant mitigation is provided, then we advise that a lasting and significant adverse effect on protected sites, species, landscape/seascape, or the wider environment cannot be ruled out meaning the EIA will have significant unresolved challenges.
- **Amber:** Natural England considers that if these are not addressed/resolved then they would have the potential to become a RED risk as set out above. Likely to relate to fundamental issues with assessment methodology which could be rectified, preferably before examination.
- **Yellow:** These are issues/comments where NE doesn't agree with the Applicant's position and/approach. Unless otherwise stated, we are satisfied for this particular project that it will not make a material difference to our advice or the outcome of the decision-making process. However, it should be noted that this may not be the case for other projects.

Point No.	Section	Para	Topic	Comments	Recommendations
Chapters 1-5 – Introduction					
1.	2.3 & 5.4	105 & 18	Decommissioning	It is noted that due to the lifetime of the project decommissioning is expected to be licenced separately. However, the impacts of decommissioning should be scoped in and considered in high level detail as part of the assessment to ensure a holistic approach, and to allow consideration of these impacts as much as is reasonably practicable at this early stage. This applies to both onshore and offshore elements.	Scope decommissioning in.
2.	3.6	3	Landfall	It is noted that one of the reasons for avoiding landfall at Thorpeness is due to the likelihood of an Adverse Effect on the Integrity of the Outer Thames	For consideration.



				Estuary SPA. Natural England would note that we have not come to that conclusion at this early stage, although impacts to this designated site would need consideration for all four of the identified landfall options.	
3.	N/A	N/A	General comment	We note that receptor value and sensitivity and impact magnitude tables have been described in the assessment methodology of each chapter. However, it is not clear if or where these have been used to scope in or scope out impacts. We recommend using impact matrices and establishing the sensitivity and impact magnitude clearly receptor in order to clarify each scoping decision.	Clearly define sensitivity and impact magnitude for each receptor.
Chapter 6 – Air Quality					
4.	6.3	Table 6-1	Air Pollution Information Service	Baseline data sources do not include the Air Pollution Information Service (APIS).	The APIS website should be consulted to identify the sensitivity of any habitats and features of designated sites. <a href="http://www.apis.ac.uk">www.apis.ac.uk</a> .
Chapter 7 – Agriculture and Soils					
5.	7.3	7.3.1	Environmental Stewardship Agreement and Woodland Grant Schemes	The onshore scoping corridor extends through areas of the Environmental Stewardship Agreement and Woodland Grant Schemes.	The Applicant should consult the Rural Payments Agency at the earliest opportunity to discuss the impacts to schemes.  We advise that the onshore scoping boundary contain land parcels which form part of a live Agri-environment scheme which is currently delivering benefits for nature, including the management of priority habitats. Consideration must

					<p>therefore be given to any permanent and/or temporary impacts from the proposals on the scheme and implications for the agreement holder in terms of any necessary 30 relocation of options, derogations, pay back of grant funding, scheme penalties etc.</p> <p>Land within the onshore scoping boundary is currently under:</p> <ul style="list-style-type: none"> <li>• Entry Level plus Higher Level Environmental Stewardship Agreements</li> <li>• Higher Level Environmental Stewardship</li> <li>• Organic Entry Level plus Higher Level Stewardship</li> <li>• England Woodland Grant Scheme</li> </ul> <p>Loss of this habitat may result in direct land take or damage to land under agreement. Any land removed from Agri-Environment schemes may result in repayment of subsidies dating back to year 1 of the scheme, and with additional penalties. Construction and operational activities that pose an impact to agreement land in terms of water resources and quality of habitat and species, loss and fragmentation and disturbance (noise, light and visual) should be considered. Timing and dates of work should be considered to ensure</p>
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					that habitats retained can be sufficiently maintained. Required mitigation should be included with the Code of Construction practise and secured in the DCO. It should also be noted that any compulsory land purchases which are subject to agri-environment schemes would also need to be repaid.
Chapter 8 – Ecology and Biodiversity					
6.	8.3	8.3.3	Buffers for onshore scoping boundary	<p>It is not clear why the following buffer distances have been applied to the Onshore Scoping Boundaries:</p> <ul style="list-style-type: none"> <li>• 10km for Internationally designated sites (including Ramsar sites, SACs and SPAs)</li> <li>• 5km for Nationally designated sites (including SSSIs, NNRs and LNRs)</li> </ul>	<p>Natural England advises that justification for these distances is clearly explained and presented.</p> <p>The search area for designated sites should be based on the potential for impact pathways to designated sites e.g. impacts on potentially functionally link land, hydrology, air quality, geology etc.</p> <p>The Impact Risk Zone (IRZ) is a useful starting point, however professional judgement should be applied using the best available evidence to determine potential impact pathways and therefore identify the protected sites to be considered.</p>
7.	8.6	Table 8-8	Ancient Woodland Inventory Sites	Natural England notes that Ancient Woodland Inventory (AWI) sites have been scoped out for construction phase, on the basis that trenchless techniques and cable routing will be used to avoid potential significant effects. It is premature to scope out habitats that	Natural England advises that AWI sites should be scoped in as habitat loss during the construction phase, until a trenchless techniques feasibility study can demonstrate that trenchless techniques will be a viable option.

				could be likely impacted during the construction phase.	
8.	8.6	Table 8-8	Walberswick landfall	<p>Natural England recognises that the cable installation route at the Walberswick landfall option has the potential for habitat loss within the following designated sites:</p> <ul style="list-style-type: none"> <li>• Minsmere-Walberswick Ramsar</li> <li>• Minsmere-Walberswick SPA</li> <li>• Minsmere-Walberswick Heaths and Marshes SAC</li> <li>• Minsmere-Walberswick Heaths and Marshes SSSI</li> </ul> <p>We note that the proposed approach is to adopt trenchless techniques such as Horizontal Directional Drilling (HDD), which is proposed to avoid significant impacts to the aforementioned designated sites. Natural England acknowledges the potential benefits of trenchless techniques over the open trenched approach, in that potential significant impacts to the designated sites can be avoided. However, Natural England notes that trenchless techniques carry risks (such as frac out and sink holes) which cannot be fully ruled out. To understand these risks at an early stage, a feasibility study with geotechnical data should be prioritised.</p>	<p>Natural England agrees with the designated sites that have been scoped in, however we welcome a commitment to the utilising trenchless techniques when going through a designated site.</p> <p>Natural England requests that a feasibility study be published for HDD through both landfall options. This would provide reassurance that techniques such as HDD would be feasible, and that open trenching would not be a requirement in these sites.</p>
9.	8.6	Table 8-8	Direct mortality	Natural England notes that direct mortality of notable species have been scoped out in the operational phase.	Natural England advises that direct mortality of designated vegetative species are scoped in during the operational phase.

				The assessment states in the table that there is potential for vegetation to be cleared and for trees and hedgerows to be cut during operation. Therefore, direct mortality of species cannot be scoped out as there is potential for loss of designated features.	Further clarity is required on how designated species will be avoided during maintenance and operational disturbance and vegetation management.
10.	8.7	8.7.21	Biodiversity Net Gain (BNG)	Natural England welcomes a BNG assessment using the Statutory Biodiversity Metric	Natural England would encourage the Applicant to deliver a minimum gain of 10%, ahead of it becoming mandatory for NSIPs in November 2025.
Chapter – 9 Geology and Contamination					
11.		Table 9-2	Potential for damage/impairment of geodiversity sites	Potential for damage/impairment of geodiversity sites has been scoped out on basis that no geodiversity sites are identified within the Onshore Scoping Boundary.	Pakefield-Easton Bavents SSSI is designated for its geological features including two Geological Conservation Review sites which lie just within the scoping area at the northern arm of the Southwold landfall option associated cable route. We advise that impacts to coastal processes arising from the Project may in turn affect the geological features of the SSSI. Therefore, we advise that this impact is scoped in.
Chapter 13 – Landscape and Visual					
12.	13.6	13.7.28	Computer-generated zones of theoretical visibility (ZTV)	Natural England welcomes computer-generated ZTV to be prepared for both construction and operation phases.	We urge the applicant to ensure both the Suffolk Heritage Coast and the Suffolk Coast and Heaths National Landscape are both assessed and included in this process.
Chapter 14 – Noise and Vibration					

13.	14.6	Table 14-2	Operational noise and vibration from underground cables	Operational noise and vibration from underground cables, including maintenance, has been scoped out on the basis of the type of equipment used being unlikely to cause annoyance or disturbance.  It is premature to scope this out, with particular relevance to maintenance, until further detail on the equipment is provided.	Further clarity on how the equipment type will have no significant noise or vibration impact is required.  Until this can be secured, we advise that the impacts are scoped in.
Chapter 17 – Material Assets and Waste					
14.	17.5	17.5.3	Site Waste Management Plan (SWMP).	Natural England supports the development of a SWMP.	N/A
15.	17.5	17.5.4	Construction Environmental Management Plan (CEMP) and Materials Management Plan (MMP).	Natural England supports the development of a CEMP detailing mitigating measures to be adhered to on-site. We also support the development of an MMP.	N/A
Chapter 18 – Marine Physical Environment					
16.	18-1	18.3.43	List of protected sites	We advise that there are a number of errors regarding the protected sites and designated features in this section. Annex I biogenic reef is also within the scoping area alongside Annex I subtidal sandbanks. Haisborough, Hammond and Winterton is specifically an SAC and should be listed as such. Minsmere-Walberswick has correctly been listed as a SSSI and Ramsar, but it is also designated as an SAC and SPA.	Correct the list of protected sites.

17.	18.6	Table 18-4	Changes to coastal morphology	We note that changes to coastal morphology have been scoped out. As stated in the scoping report, there is an impact pathway from the potential requirement for a temporary coffer dam or temporary deposits as part of construction. We understand that the Applicant intends to undertake a separate technical report to consider impacts of erosion and beach draw down on coastal morphology, and therefore advise that, in the absence of this report at this stage, impacts to coastal morphology should be scoped in.	Scope in this impact.
18.	18.6	Table 18-4	Seabed preparation (excluding pre-sweeping) and cable burial	We note that seabed preparation (excluding pre-sweeping) and cable burial has been scoped out. It is unclear which seabed preparation activities are to be undertaken, and therefore Natural England cannot be confident that these works will not have any negative environmental impacts. We therefore advise that this impact is scoped in.	Scope in seabed preparation (excluding pre-sweeping) and cable burial.
Chapter 19 – Intertidal and Subtidal Benthic Ecology					
19.	19.3	19.23.2 8	Habitats Regulations Assessment	Natural England notes that the Applicant intends to undertake a Stage 1 Habitats Regulations Assessment (HRA) to consider possible impacts to European designated sites, listed as 'SACs, Sites of Community Importance (SCIs) and Ramsar sites'. We advise that Special Protection Areas (SPAs) should be considered in an HRA, with particular regard to prey species impacts.	Correct the description of the intended Habitats Regulations Assessment.

20.	19.6	Table 19-5	Temporary habitat loss and seabed disturbance for subtidal broadscale habitats	We note that temporary habitat loss and seabed disturbance for subtidal broadscale habitats has been scoped out, on the basis that the habitats present have medium to high resilience, so recovery will occur in the short-term. Natural England advises that, especially where seabed preparation techniques have not been finalised, there is a clear impact pathway from temporary habitat loss to broadscale benthic species and habitats regardless of recoverability, both in the construction and operation phases (where repairs may be required).	Scope in temporary habitat loss for subtidal broadscale habitats and species.
21.	19.6	Table 19-5	Permanent habitat loss for intertidal and nearshore habitats	We note that permanent habitat loss for intertidal and nearshore habitats has not been considered in the assessment. We advise that this potential impact is included and scoped in.	Include the potential for permanent habitat loss for intertidal and nearshore habitats in the assessment.
Chapter 20 – Fish and Shellfish					
22.	20-3	20.3.71	Outer Thames Estuary SPA	We note that Vlaamse Banken SAC (Belgium) and Essex Estuaries SAC have been listed here as protected sites within the offshore scoping with Annex II designated fish species and as areas relevant to fish and shellfish impacts. We advise that the Outer Thames Estuary SPA, designated for common and little tern, and red-throated diver, for which sandeel are a key prey resource, should also be considered here.	Add Outer Thames Estuary SPA and associated designated features to the list of protected sites to be considered within this chapter.
23.	20.6	Table 20-8	Seabed preparation and all species	We note that seabed preparation (excluding pre-sweeping) and cable burial has been scoped out for all species. It is unclear at this stage which	Scope in seabed preparation (excluding pre-sweeping) and cable burial for all species.



				seabed preparation activities are to be undertaken, and therefore Natural England cannot be confident that these works will not have any negative environmental impacts. We therefore advise that this impact is scoped in.	
Chapter 21 – Intertidal and Offshore Ornithology					
24.	21.4	4	Operational impacts	While changes to prey distribution is considered due to cable repairs, the section does not include deployment of additional cable protection. It is a common occurrence that cable repairs require some additional cable protection due to issues reburying sections of the cable unburied for repair works. While Natural England has concerns about the deployment of cable protection throughout the lifetime of a project, we consider deployment up to ten years after construction could be included. Therefore, would note that the impact to prey distribution may also include through deployment of additional cable protection.	Include deployment of cable protection during operation as a potential impact to scope in.
Chapter 22 – Marine Mammals and Marine Reptiles					
25.	22.5	Table 22-5	No consideration of UXO removal	The project has scoped out construction and operation impacts to cetaceans and pinnipeds. However, part of the pre-construction works is likely to involve removal of UXOs through high order or low order detonations, either of which may cause disturbance or injury to marine mammal species and should be scoped in. This is a particular concern for the Southern North Sea (SNS) SAC	Construction impacts should be scoped in for cetaceans and pinnipeds.

				where cumulative impacts with other projects generating underwater noise will require consideration e.g. piling. This may also apply to pre-construction surveys; it is noted some of these noisy surveys may be subject to an exemption, however, the exemption may not apply within the designated site and the impacts should be considered.	
Chapter 29 – Cumulative and Combined Effects of the Project					
26.	29.3	Table 29.5	The maximum Zol for marine mammals	Natural England notes the assumption of a 25km Zone of Influence (Zol) for in combination impacts for marine mammals. However, when considering cumulative and in-combination impacts on the SNS SAC it is the entire site area of the SAC that needs to be considered. The site is split into summer and winter areas. For example, the advised disturbance limits for the SAC relate to disturbance from 20% of the active area (summer or winter) from the site in a single day. Therefore, projects impacting anywhere within the active area of the site (summer or winter) may have cumulative impacts with other projects despite being further than 25km apart. This is especially relevant to the consideration of noise impacts from UXO removal.	Any project that effects the SNS SAC spatially and temporally should be scoped in for impacts to marine mammals.
27.	29.3	Table 29.5	The maximum Zol for offshore ornithology	As per our advice above the impact to designated species, especially RTD, throughout the entire Outer Thames Estuary SPA should be considered for all projects that have an impact on the	Any project that effects the Outer Thames Estuary SPA spatially and temporally should be scoped in.

				site and a potential temporal overlap with the project.	
28.	29.3	21	Only considering projects consented within the last 5 years	Natural England advises that for NSIP projects such as Offshore Wind Farms many DCOs allow for up to seven years to start construction. Furthermore, many offshore projects have impacts that persist into operation, such as disturbance to RTD. Therefore, projects should be scoped out based on their actual status and not a base assumption on a 5 year period.	Projects should only be scoped out when there is certainty that either their consent has expired, or that the project has constructed and that no impacts persist into operation.
29.	29.3	Table 29-6	The maximum Zol for ecology and biodiversity	Natural England notes that a 10km Zone of Influence (Zol) has been given for potential impacts on Ecology and Biodiversity around designated sites. Further information is required to justify this distance, including evidence all impact pathways have been included.	Natural England asks for further information to be provided regarding the 10km Zol distance for Ecology and Biodiversity to provide clarity on how this distance has been justified.  We also advise you provide further justification on the 5km Zol given for nationally designated sites as stated in Chapter 8 (8.3.3).
30.	29.5	29.5.1	Coordination with SeaLink	Natural England welcomes the opportunity to coordinate with SeaLink regarding the co-location of Friston Substation.	N/A
31.	29.3	29.3.29	Cumulative Assessment	It is stated here that ' <i>Where 'other developments and/or approved development' are expected to be completed before construction of the proposed Scheme and the effects of those projects are fully determined, effects arising from them will be considered as part of the future baseline assessed in the technical chapters and</i>	Projects should be scoped into the cumulative assessment on a project by project basis and a list of projects scoped in should be circulated to statutory authorities for comment prior to the PEIR and application stages of the development.

				<p><i>they will be excluded from the preliminary short list and scoped out of the cumulative effects assessment</i>’.</p> <p>Natural England advises that there is potential for inter-project effects even when developments are fully constructed. As above, we have concerns that other projects will not be appropriately considered in the cumulative assessment with this approach.</p>	
32.	29.3	General Comment	Lack of preliminary lists of projects	<p>It is apparent from this chapter that a cumulative assessment of projects has not been undertaken at this stage, and instead will be undertaken and provided within the Preliminary Environmental Information Report (PEIR) and ES. Natural England would expect a preliminary list of projects to be established and assessed at the scoping stage. Without this, we cannot accurately assess any scoping decision made in this chapter.</p>	<p>Complete a cumulative assessment of all projects before the PEIR and ES stages and consult on this as part of the ongoing pre application engagement.</p>

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**From:** Before You Dig <BeforeYouDig@northerngas.co.uk>  
**Sent:** 07 March 2024 10:39  
**To:** Lionlink Interconnector  
**Cc:** Before You Dig  
**Subject:** RE: :EN020033 - Lion Link - EIA Scoping Notification and Consultation

You don't often get email from beforeyoudig@northerngas.co.uk. [Learn why this is important](#)

Northern Gas Networks do not cover this area.

Please use this online tool to find out which gas distribution network you need to contact:

<https://www.energynetworks.org/operating-the-networks/whos-my-network-operator>

Kind regards,

**Jennie Adams**

**Administration Assistant  
Before You Dig  
Northern Gas Networks**



Before You Dig: 0800 040 7766 (option 3)

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Alternative contact:

[beforeyoudig@northerngas.co.uk](mailto:beforeyoudig@northerngas.co.uk)



**Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at [together.northerngasnetworks.co.uk](https://together.northerngasnetworks.co.uk) Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.**

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas



## Reydon Parish Council

Ann Dobson – Clerk to the Council

Tel: [REDACTED] Email: [REDACTED]

### RESPONSE TO LIONLINK EIA SCOPING PROPOSAL, MARCH 2024

1. We wish strongly to challenge the apparent dismissal of the shorter routes from further south than Southwold or Walberswick to Friston which offer more opportunities for co-location of infrastructure with other projects and, being shorter, will cause less disruption to wildlife habitats, the landscape and the community. We see no evidence from NGV which will pass the scrutiny of an examination in public to support the current decision to rule out these routes. A full and transparent (re)assessment that is compliant with government approved methodology based on verified and shared data should be included in the scope of the EIA. This should extend to full analysis of the option(s) for offshore infrastructure (see 2f below)
  
2. We are not able, as a Parish Council, to respond to the technical and detailed information included in the scoping proposals. However, we want to make some points about key issues which we consider must be addressed if the EIA is to be an adequate appraisal of these proposals. Therefore, we call for an EIA which includes:
  - a. Consideration of the cumulative impact of ALL the schemes proposed for Suffolk as well as of the specific impacts of LionLink.
  
  - b. An analysis to determine whether the local road transport network has sufficient capacity to accommodate Lionlink construction traffic in addition to the construction traffic from permitted developments of some 300 new houses in Reydon (principally St Felix and Copperwheat) together with residential, business and tourist traffic. This analysis must take account of the fact that there are three routes from the A12 to Southwold and Reydon, one of which (B 1127) is subject to regular flooding at Potter's Bridge and one of which (B1126) goes through residential areas in both Wangford and Reydon (and is the planned construction route for the Copperwheat development of 220 dwellings). It must also consider the impact on the single road access to Southwold at Might's Bridge on the A1095.
  
  - c. An investigation of the impact of the long cable routes from Reydon and Walberswick to Friston and an analysis of their impact in comparison to that of the previously proposed shorter routes. In other words, the impacts of all the routes initially proposed should be appraised and compared.
  
  - d. Analysis of the impact of coastal erosion on the security and stability of the proposed infrastructure. In particular, the rapid erosion of the cliffs at Easton Bavents to the north of the proposed Southwold landfall will be a threat to the

coastal connection point as sea flooding in the foreseeable future is likely to come around the current sea wall unless major work is undertaken to extend and reinforce the current sea defences. Currently, the Shoreline Management Plan is to hold the line at the sea wall but to allow managed retreat of the cliffs to the north. This will, in time, undermine the sea wall and flood the whole area behind it along the course of the drained section of Buss Creek. The plans to address this involve new protections for the threatened housing in Southwold and Reydon but not of the area immediately behind the current sea wall where the landfall connection is proposed.

- e. Consideration of the risks of cabling close to areas of marsh and reedbeds and, in particular, the cabling proposed to the south of Reydon Smear reedbeds and marsh. It is not clear if the adjacent land is sufficiently stable and can sustain construction and underground cabling. There is also a significant risk to the hydrology of the reedbed which is a highly protected habitat for, among other species, bittern and marsh harrier. The proposed cable route passes through the gentle slopes comprising the main parts of the rainfall catchment on the southern side of the marshes. If the soil structure is fractured by the cable trench, the throughflow of water into the marshes may be affected adversely. In brief, trenching the northern bank (this runs parallel to the A1095 and Rissemere Lane East) of the Reydon Peninsula has the potential to severely impact on the natural floodplain which runs down to Easton Bavent marshes which in turn will disturb river levels specifically the River Wren which is in an SSSI catchment area. The potential to disturb the natural flow of water could cause irreparable damage to cattle grazing marshes, affected arable land and protected birds such as Bitterns.
- f. A full appraisal of offshore alternatives and options for landfall on brownfield sites based on HND ('Holistic Network Design') principles using consultants who are independent of all current stakeholders for both LionLink, Sealink and the other proposed transmission lines to the Suffolk coast.
- g. Recognition that there is not a community in the country which is suffering the number, density and variety of energy projects as this part of East Suffolk. The EIA, therefore, must measure the impact of the construction process for LionLink as well as the cumulative impact of this alongside that of Sizewell C and other electricity transmission projects on the local economy and, in particular, on:
  - i. tourism
  - ii. agriculture
  - iii. local employment as well as likely unemployment
  - iv. inward and local investment
  - v. taxes (e.g. fall in tax receipts as a result of businesses and residents moving out of East Suffolk in response to the negative short and longer-term impacts of the projects under review)

- vi. Future productivity in the area
- h. A full road traffic study which measures the impacts of various energy projects, not just LionLink (and significant local construction schemes in Reydon – see point c above) coming forward simultaneously on *all* the above highlighted economic drivers.
  - i. Full coverage of the single and cumulative impacts on the landscape, habitats and biodiversity and in particular in relation to the Reydon/Southwold landfall option, it must measure the impacts on:
    - i. Protected habitats that span the proposed Reydon Route include: AONB/National Landscapes (Southwold, Reydon) and SSSI (Easton Bavents, High Wood Farm, Reydon).
    - ii. Bird species, including Bittern and Marsh Harrier and other red listed species identified in and around Easton Bavents, including Schedule 1 birds: Avocet, Curlew, Brambling, Firecrest, Hobby, Red Kite, Peregrine and Cetti's Warbler.
    - ii. Protected landscape and habitats, including Reydon Smear Marshes which is one of the largest fresh water reedbeds in the UK (see also point e above).
    - iii. Established trees and hedgerows in the line of the proposed cable routes. This should include, in consideration of the route proposed from the Southwold landfall, the venerable oaks on the proposed route and protected trees located at Field No 5418 Adjacent to Nos 34 and 35 Elms Lane, Wangford.
    - iv. Protected species which can be found along the route from the Southwold landfall via Reydon. These include: Otters (Reydon, specifically High Wood Farm - Confirmed sighting) Great Crested Newts (Reydon, specifically Reydon Wood - Confirmed sighting), Bats (Reydon, specifically Rissmere Lane East - Confirmed sightings including a known roost of long eared brown bats residing parallel to the proposed Reydon Route), Badgers (All villages along the route), Water Voles (Reydon - specifically High Wood Farm and Low Farm Brampton, - Confirmed sightings).
  - j. Analysis of the impact of cabling on agriculture, which is important both as part of the local economy and for its contribution to national food security. This should include:
    - i. The impact on the soil structure of the respective farms which can be exacerbated by work during inclement weather.
    - ii. The disturbance to the drainage systems both surface drainage through ditches/dykes and also artificial drainage systems which have been installed.
    - iii. The disturbance to any farm infrastructure ie roads/tracks/buildings which necessitate repair or



replacement...those actions making an inevitable environmental impact on the relevant area.

- iv. The disturbance to any irrigation systems as a result of the scheme and the impacts as detailed above on remedying any disturbance.
  - v. Changes to the crop rotations due to the proposed impact of the scheme and its effect on the environment.
  - vi. The increased incidence of machinery working in severed field areas due to the scheme. This will generate more soil disturbance and use of energy.
  - vii. The inevitable disturbance to the various environmental schemes across the farms and those areas which will be directly affected. These schemes are longstanding and environmental damage is rarely capable of remedy.
  - viii. The environmental impact on boundary features including hedges and hedgerow trees impacted by the scheme.
  - ix. The carbon released through the disturbance to the soil structure during construction, including of associated infrastructure.
  - x. The environmental impact of crossing the Blyth Valley is likely to be very substantial both economic and directly to protected habitats.
  - xi. The impact of trenching through 3-year-old asparagus fields in Reydon which take time to establish before harvesting is viable.
  - xii. The disturbance to the various government environmental schemes (such as Countryside Stewardship and Sustainable Farming Incentive) to which the majority of the farms on the route subscribe.
- k. Full assessment of the economic impacts relating to LionLink and cumulatively from all the other energy projects and:
- i. Examine impacts of tourism drops at -20%, -40%, -50%, -60% (not just dependent on traffic study impacts but also tourist 'perceptions' of the Suffolk coast post project announcements) – the EIA must commit to proper qualitative national analysis of the perceptions of potential visitors to the Suffolk coast as a consequence of the single and cumulative impact of the proposals under review (see also point l below)
  - ii. Examine seasonal differences: winter weekends attract visitors and stays but a drop could take outlets below minimum viability to remain open. The impact of curtailed summer hours must also be assessed.
  - iii. Assess the impact beyond the completion of the works. How long will it take the economy to recover assuming *no further projects*?
  - iv. Clearly settle whether we are due to have one or multiple transmission systems in north Suffolk. Currently the proposals are vague on whether LionLink cabling corridor will have a 40m or

55m width dependent on whether it will contain one or two systems.

- v. Assess the impact on local jobs (principally tourism, light industry and agriculture) - if tourism jobs go what replaces them for this particular workforce?
  - vi. Assess the effects on the local economy, including reductions in hours worked and incomes.
  - vii. Assess the drop in transactions and investment which will be cancelled or taken elsewhere and the consequent drop in property prices and land values.
  - viii. Assess the long-term impact of the drop in transactions and investment on jobs, the economy and local tax income.
- l. Recognise the significance of tourism to the local economy of East Suffolk. LionLink wrongly states that 24% of local employment is tourist related but, if hospitality and support services are included, this amounts to almost 50%. The EIA must recognise that tourism is not only vital to pubs, hotels, restaurants, breweries and distilleries but to all the allied sectors: building, gardening and maintenance, lettings agencies, farmers and food vendors, inshore fishing, clothes and gift shops cycling, sailing, ornithology, concert venues, cinemas etc. The Destination Management Organisation (DMO, representing many of the tourism related businesses) commissioned independent market research in 2019 which concluded that visitors would be turned away because the features which attract them (rural peace, wildlife havens, interlinked footpaths and reserves, places of exceptional charm and character) will be damaged by the development of energy infrastructure. It is estimated that 17-30% of tourists will go elsewhere – with consequences for the local economy as set out in point j above. The DMO estimates that the loss to the local economy will be £1bn over the next 12-15 years. The EIA must address these issues, examine the evidence fully and identify the impacts and their consequences for our people and their livelihoods.
- m. Proposals for the mitigations and compensations needed to minimise and offset the disadvantages of these developments to the community, its prosperity and well-being. These could include:
- i. A new sustainable road link from Southwold and Reydon to the A12 which would meet a need arising from the foreseeable demise of links via the A1095 and the B1127 whose bridges are at or below sea level and might go some way to protecting our future tourist economy in recompense for the damage suffered during the construction phase.
  - ii. new cycle and pedestrian routes through the natural landscape following the cable runs to the sea designed by well-known British architects.
- n. Establishment of the kinds of mitigations and compensation to avoid or restore damage to habitat and the species dependent on them and to minimise and/or ameliorate damage to the tranquility and visual amenity of the landscape.

- o. The precise mitigations that should be offered in relation to the diminution in property values; lettings income and the value of agricultural land.
- p. A full assessment of any community benefits which the EIA can pinpoint (e.g. improved pedestrian and cycling routes to the sea and through the landscape as set out above) and of any economic or employment benefits which can be identified.

Cllr Pam Cyprian, Chair Reydon Parish Council, March 31 2024



## **Proposed DCO Application by National Grid Interconnector Holdings Limited for LionLink Multi-Purpose Interconnector**

### **Royal Mail response to EIA Scoping Consultation**

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated March 2024. There are five operational Royal Mail properties within 10km of the proposed works.

The construction of the onshore elements of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

**Holly Trotman** [REDACTED], Senior Planning Lawyer, Royal Mail Group Limited

**Daniel Parry Jones** [REDACTED], Director, BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End

# Saxmundham Town Council

## Response to National Grid LionLink Limited EIA Scoping Report: EN020033

### Introduction

It is noted that to meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017, Nationally Significant Infrastructure Projects which are likely to have a significant effect on the environment are required to undertake an Environmental Impact Assessment and to provide an Environmental Statement ('ES') to accompany an application for a Development Consent Order. The ES sets out the potential impacts and likely significant effects of the proposed development on the environment. To inform the scope and level of detail of the information to be provided with the ES, National Grid LionLink Limited ('the Applicant') has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, under the EIA Regulations.

We further note that the Planning Inspectorate has identified Saxmundham Town Council as a consultation body therefore the following represents its views. The Town Council requests the Planning Inspectorate to consider this submission before adopting its Scoping Opinion for information to be included in the ES.

### Issues of Concern

Whilst our comments are based on the part of the development that directly affects our community, namely, the Converter Station, we have also highlighted general development issues that we consider should be addressed.

We have endeavoured to address the issues in order of the Scoping Report – Volume 1 Main Text<sup>1</sup> but due to our significant concerns regarding the cumulative effects, we note the following:

### Chapter 29 - Cumulative Effects and Intra Project Effects of the Project

Saxmundham Town Council is concerned that the Applicant has generally not identified cumulative effects at this stage. This, in our opinion, devalues all observations made in the entire procedure. Saxmundham and the surrounding area, as the Applicant is acutely aware, faces immense disruption from numerous Nationally Significant Infrastructure Projects ('NSIPs') in our area including:

- Sizewell C nuclear power station and associated development including roadworks to the A12;

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<sup>1</sup> [EN020033-000046-LION - Scoping Report - Main Text.pdf \(planninginspectorate.gov.uk\)](#)

- East Anglian One North and East Anglian 2 sub station in the neighbouring parish of Friston;
- National Grid Group’s Nautilus Interconnector;
- National Grid Electricity Transmission’s SeaLink that also proposes to build a Converter Station at Saxmundham;
- SSE Renewables North Falls and Five Estuaries offshore wind farms;
- East Anglia Green – Norwich to Tilbury electricity transmission line.

Outside NSIPs, major work is planned to develop land on the other side of Saxmundham to create a South Saxmundham Garden Neighbourhood (‘SSGN’). An employment/service area is proposed to the west of the A12 and circa 800 new homes to the east of the A12. The first part of the scheme, the employment/service area, involves construction of a new roundabout, spur roads, and two pedestrian crossings on the A12. This is due to be submitted for planning consent in the second quarter of 2024, with commencement in 2025 and completion in 2027. The housing development is forecasted to commence 2026/2027. Planning permission has not been sought yet, albeit the allocated development land is in East Suffolk Council Local Plan and Saxmundham Town Council are actively working with the developers in the master planning of the scheme.

As a consequence of the Applicant’s lack of assessment of cumulative effects, their assessment of Zones of Influence (‘Zol’) is also very ambiguous, as the zones do not take into consideration the effect of LionLink in tandem with all NSIPS proposed for the area. Therefore, Saxmundham Town Council can only comment taking into consideration the paucity of information provided by the Applicant as follows.

## Zones of Influence for Onshore Environmental Topics<sup>2</sup>

### Noise and Vibration

The Applicant states the Zol in the construction phase to be 300m from the order limits. Considering the noise and vibration impacts of other concurrently running projects, namely the proposed SeaLink, Sizewell C and SSGN, this maximum Zol should be reviewed.

### Air Quality

The Zol is stated as 350m from the order limits. This should be reviewed as it is possible that two Converter Stations, for LionLink and SeaLink, could be constructed consecutively. The prevailing wind on fine warm afternoons is from the east, when offshore winds become predominant, and transmit dust further into the urban settlement of Saxmundham.

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<sup>2</sup> Table 29-6

## Health and Wellbeing

The Zol in the construction phase is 250m from the order limits. The potential for multiple developments in the area, together with the proximity of housing, renders this limit too low. This will be aggravated by increased construction traffic and the potential for a haul road that skirts the north-east and east of the town.

## Historic Environment

During the construction phase, the Zol is just 1km from the order limits. There are numerous old buildings, and a Conservation Area in Saxmundham's town centre, and in our neighbouring parishes Kelsale-cum-Carlton and Benhall and Sternfield. Increased HGV traffic in these locations has the potential to cause damage by vibration. Moreover, during the operational stage the Converter Station could be visible from the higher part of Saxmundham and blight the views including one from Albion Street across the town to Church Hill, a significant view identified in the Saxmundham Neighbourhood Plan.<sup>3</sup>

## Socio Economics

The increased traffic during the proposed construction would likely create delays for pedestrians, cyclists, motorists and bus users. This would be aggravated by the cumulative effects of other major developments. This renders the 500m Zol from the order limits not sufficient. In many cases, Saxmundham, which serves as a shopping hub with two major supermarkets, may be avoided thus creating problems for smaller independent shops, the weekly and monthly markets and other visitor attractions.

## Other Potential Developments<sup>4</sup>

It is noted that the preliminary 'long list' of potential other developments and/or approved developments will be identified through a desk-based review within the greatest Zol for each topic of the proposed scheme. It is presumed that the employment/services area of the proposed SSGN will be included within this assessment.

## Other Minor Developments<sup>5</sup>

It is noted that the minor developments may give rise to a cumulative effect due to their proximity to the proposed scheme and therefore minor developments will be included in the 'long list' where they are located within 200m of the boundary defined by design development as presented in the Preliminary Environmental

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<sup>3</sup> Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

<sup>4</sup> Paragraph 29.3.23

<sup>5</sup> Paragraph 29.3.26

Impact Assessment ('PEIA'). Saxmundham Town Council would strongly urge, that due to the burden of proposed NSIPs in the area, the ZOI boundary should be extended outwards from 200m to take into consideration the associated traffic increase and include developments that border the A12 up to 5km.

### Colocation<sup>6</sup>

Saxmundham Town Council contends that colocation should not be the only aim but extended to coordination which is vital to prevent wasted resources in duplicated work in responding to a plethora of NSIP consultations. The burden on Town, District and County Councils is unacceptable. Suffolk County Council have threatened to oppose LionLink development if it does not demonstrate meaningful coordination. Whilst there are clear differences between LionLink and SeaLink in terms of landfall and DC cabling routes, they are almost certain to be identical in terms of Converter Station sites and AC cabling routes.

Moreover, any proposed multiple converter stations should be co-designed and therefore of similar and corresponding design sympathetic to the environment and landscape. Multiple developers should also seek to co-share ancillary and administration buildings and lay down areas where possible.

## Chapter 2 - The Proposed Scheme Description

### Proposed Converter Station<sup>7</sup>

Saxmundham Town Council finds it extraordinary that major electrical infrastructure projects are not coordinated, yet the LionLink proposal also mentions the potential to coordinate with the proposed SeaLink and Nautilus projects. We contend that there does not appear to be any coordination, just the potential to co-locate. As such, we would request a moratorium on any development until the multiple National Grid companies visibly demonstrate coordination.

## Chapter 3 - Assessment of Alternatives

### Appraisal of Converter Station Options and Preferred Option Identification<sup>8</sup>

The Applicant states that the Saxmundham site was identified as 'the best performing having the potential to be viewed as an extension to the existing settlement of Saxmundham and benefitting from some existing screening from existing woodland and field boundaries'.

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<sup>6</sup> Paragraph 29.5

<sup>7</sup> Paragraph 2.3.24

<sup>8</sup> Paragraph 3.5.13



Saxmundham Town Council disputes the assertion that the LionLink, or indeed SeaLink Converter Stations would 'be viewed as an extension to the existing settlement of Saxmundham'. If the current Converter Station proposals proceed, the whole character and landscape of our town will change forever. As per Saxmundham Town Council's response to the SeaLink Statutory Consultation: 'We risk facing a giant set of industrial structures that will overshadow and dominate our town. But whereas in previous industrial revolutions, new industry has brought jobs and prosperity to the towns affected, we know that this will not be the case here. We will have all the impacts of random, unplanned industrialisation but without any of the economic benefits accruing to us. Our town faces a fundamental, externally imposed overturning of its character and heritage.'<sup>9</sup> This statement applies equally to the LionLink and SeaLink proposals.

## Chapter 5 - EIA Approach and Method

### Assessment Years<sup>10</sup>

We understand that the proposed construction would commence in 2026, and the baseline for potential effects of the scheme is 2024. Saxmundham Town Council agrees with the statement that the baseline for intra and inter-project cumulative effects must be adjusted according to the development of any other major infrastructures. However, we must note that we find the situation that so many energy transmission projects are vying for Converter Stations in Saxmundham very concerning and request coordination between the various NSIPS. This is pertinent to the National Grid companies who contend they are separate companies but are part of the same overarching entity.

## Chapter 6 - Air Quality

Saxmundham Town Council is unable to comment to any degree on this chapter as LionLink have not undertaken a cumulative impact assessment, but would make the following observations:

### Road Traffic<sup>11</sup>

The main sources of traffic emissions are noted as the 'A' roads, including the A12 that bypasses Saxmundham. Saxmundham already suffers at times from traffic congestion at the heavily used traffic light controlled at the B1121/B1119 crossroad in its town centre. Therefore, all site traffic must be directed away from this point to prevent congestion and traffic emissions. Should the project proceed:

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<sup>9</sup> NGET – Sea Link Statutory Consultation Saxmundham Town Council Response, December 2023.

<sup>10</sup> Paragraphs 5.4.10 and 5.4.11

<sup>11</sup> Paragraph 6.3.11

- We recommend that the Applicant collaborates with Sizewell C Co to use their park and ride facilities to the north at Darsham and to the south at Hatcheson to negate the need to provide workers' car parking and reduce vehicle movements in and around Saxmundham, and to make use of the traffic incident management areas and postal consolidation facilities at both sites.
- We recommend that the Applicant collaborates with Sizewell C Co to use their freight management facility at Seven Hills to reduce the number of HGV and LGV movements in and around Saxmundham.

## Chapter 7 - Agriculture and Soils

### Proposed Scope of the Assessment<sup>12</sup>

We are disturbed to read that the Applicant has not identified the grade of agricultural land, nor the quantity of land required for the Converter Station site at Saxmundham and the Sub Station site at Friston. The land at the proposed Converter Station site, at Wood Farm, is good quality, clay soil that is well drained and managed by generations of the same farming family. It produces cereal crops without the need for irrigation. We are therefore disappointed that this land, currently used for food production, is being lost for energy transmission.

## Chapter 8 - Ecology and Biodiversity

There is scant reference to the proposed Saxmundham Converter Station site in the Scoping Opinion. Therefore, we present our findings submitted to the National Grid Electricity Transmission SeaLink Statutory Consultation:<sup>13</sup>

DEFRA has developed a biodiversity gain statement which sets out the detail of the biodiversity net gain requirement for NSIPs. All terrestrial NSIPs from November 2025 are expected to achieve at least 10% measurable biodiversity net gain for at least 30 years.<sup>14</sup>

It should be noted that farmland, whilst not environmentally obviously diverse, plays an important role in the ecological system.<sup>15</sup> There has been a dramatic crash in farmland birds, due to modern intensive

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<sup>12</sup> Table 7-2

<sup>13</sup> NGET – Sea Link Statutory Consultation Saxmundham Town Council Response, December 2023.

<sup>14</sup> Department for Levelling Up, Housing and Communities Nationally Significant Infrastructure: Action Plan For Reforms To The Planning Process – February 2023.

<sup>15</sup> Information sourced from Friends of the Earth for Saxmundham's response to the SeaLink Statutory Consultation.

methods and loss of habitat.<sup>16</sup> Sightings of animals (although not an exhaustive list) in the area include those found in agricultural and river settings:

Skylarks	Badgers	Grass Snakes	Kingfishers	Buzzards	Muntjac
Red Deer	Hedgehogs	Sparrow Hawks	Red Kites	Kestrels	Hedgehogs
Barn Owls	Tawny Owls	Slow Worms	Adders	Field Mice	Bats
Hares	Swifts	Woodpeckers	Foxes	Lapwings	Marsh Harriers
Possibly Water Voles					

Saxmundham Town Council expects that the Applicant will undertake a comprehensive ecological assessment for the proposed Converter Station site.

## Chapter 10 - Health and Wellbeing

It is noted that two of the main themes identified in the non-statutory consultation were:

- Community fatigue and stress from being subjected to prolonged consultation on a number of projects in the area;
- Detail on mitigation aspects for residents 'enjoying' where they live, access to leisure amenities, and the impact this will have on their quality of life and therefore their mental and physical health;
- The cumulative impact of the LionLink and associated projects on air quality.

Saxmundham Town Council would add at this stage our concerns regarding the proximity of the proposed Converter Station in respect to:

- Proximity to housing, creating issues of stress due to physical issues of noise, dust, vibration and light pollution during construction.
- Proximity to housing, creating issues of stress due to physical issues of noise during operation.
- Proximity to housing creating stress due to devaluation of housing.

### Proposed Scope of Assessment<sup>17</sup>

There appears to be no reference to noise in the Scoping Assessment for the operational stage. Considering there are up to three proposed Converter Stations to be sited, the issue of Operational Noise should be included.

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<sup>16</sup> Information sourced from Friends of the Earth for Saxmundham's response to SeaLink Consultation.

<sup>17</sup> Table 10-1

## Chapter 11 - Historic Environment<sup>18</sup>

Saxmundham Town Council considers that Hurts Hall, a Grade II Listed Building in Saxmundham, should be included in the Scoping Opinion.<sup>19</sup> Whilst the original building was destroyed by fire in 1890, it was rebuilt and is a building of note, and the house and grounds are identified in the Saxmundham Neighbourhood Plan as a protected view, 'important' to the overall landscape character of the parish and which can be enjoyed from publicly accessible locations.<sup>20</sup> There are two views of particular note from the B1122 looking across to Hurts Hall and St John's Church. The first panoramic view, looking north-east, includes open farmland in the foreground, Hurts Hall and St Johns Church in the middle distance, backed by wooded rising land. The second view, from a high point of The Layers looking across the River Fromus to Hurts Hall, gives a wide view of the buildings and the backdrop of rising woodland. It demonstrates the contrast between the open landscape of the valley and wooded ridge, below which the town sits.

We are concerned that the development of the converter site will lead to industrialisation of the open countryside to the east of Saxmundham and due to the magnitude, will also adversely affect the important open views. Contrary to claims made in the Scoping Opinion, this site is not naturally screened by adjacent woodland at Bloomfield's Covert and thus existing screening to the west is unlikely to provide mitigation to the north, south and east. The huge converter station buildings will be out of keeping with the character and landscape of rural East Suffolk where the local architecture is predominantly of low build.

## Proposed Scope of Assessment<sup>21</sup>

Saxmundham Town Council wishes to correct the following description given in the table: 'The village of Saxmundham and its environs are adjacent to proposed Converter Station Site.' Saxmundham is a town of approximately 5,000 people. It is not a village!

## Chapter 12 - Hydrology, Hydrogeology and Drainage<sup>22</sup>

It is noted that the River Fromus is considered by the Applicant to be outside the scoping area but within the study area. Saxmundham Town Council requests that the River Fromus is included within the scoping.

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<sup>18</sup> Paragraph 11.3.25

<sup>19</sup> Historic England website, [HURTS HALL, Saxmundham - 1268178 | Historic England](#)

<sup>20</sup> Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

<sup>21</sup> Table 11-4

<sup>22</sup> Table 12-7

Currently there are moves to improve the river and we consider that the construction of the proposed Converter Station may increase surface water run-off from former farmland which may result in pollution.

## Chapter 13 - Landscape and Visual Amenity

### Converter Station Site<sup>23</sup>

Whilst the Applicant correctly identifies that the proposed Converter Station will be visible from the B1119, it has, however omitted the B1121. The proposed Converter Station will blight the view towards Hurts Hall and entirely change the attractive vista of this Grade II listed building and its associated parkland. This view is identified as significant in the Saxmundham Neighbourhood Plan.<sup>24</sup> As such it must be included within the scoping.

### Operation<sup>25</sup>

The Applicant states that during the operation of the proposed Converter Station, that there will be 'impacts on tranquillity and night-time lighting effects'. Due to the proximity to housing, we suggest that mitigations be put in place by the installation of sensor lights and screening to prevent constant illumination and disturbance to residents.

## Chapter 14 - Noise and Vibration<sup>26</sup>

Whilst outside the scope of Saxmundham, the Town Council is surprised to note that our neighbouring parishes of Benhall and Sternfield and Kelsale-cum-Carlton, are not recorded in the Scoping Opinion. Undoubtedly, they will be affected by the proposed development's construction, road traffic, noise and vibration. In our opinion these villages should be considered.

## Chapter 15 - Traffic and Transport

Saxmundham Town Council is unable to comment to any degree on this chapter as the Applicant has not undertaken a cumulative impact assessment, but we reiterate our observations previously stated in respect to air quality. This includes the need for the Applicant to conduct a full traffic impact

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<sup>23</sup> Paragraph 13.3.29

<sup>24</sup> Saxmundham Neighbourhood Plan [Saxmundham neighbourhood plan » East Suffolk Council](#)

<sup>25</sup> Paragraph 13.4.3

<sup>26</sup> Paragraph 14.3.10

assessment of the town centre and to direct all site traffic away from this point to prevent further congestion and to collaborate with Sizewell C Co to use their park and ride, traffic incident management, freight management and postal consolidation facilities to reduce the number of vehicles movements during the construction phase.

### Proposed Scope of the Assessment<sup>27</sup>

We note that abnormal loads are scoped out of the traffic assessment, and we consider that this is incorrect. The Applicant has not undertaken a cumulative impact assessment reflecting the extent of other NSIPs and considering the increased volume of traffic in this rural area, abnormal loads will likely create road delays, to workers, residents and visitors irrespective of being scheduled during off-peak hours.

## Chapter 16 - Socioeconomics, Recreation and Tourism

### Study Area<sup>28</sup>

The Applicant notes that the Onshore Scoping Boundary is the study area plus a 500m buffer. Saxmundham Town Council considers this is far from sufficient for the following reasons:

- The Applicant has not taken into account the cumulative effects, of traffic issues of other major projects.
- Saxmundham, whilst not a tourist town, services the tourist industry as a shopping hub for nearby coastal resorts: namely Walberswick, Southwold, Aldeburgh and Thorpeness, Carlton Meres and Cakes and Ale Holiday Parks and visitors to the RSPB Nature Reserve at Minsmere. Major construction works, congested roads and road closures caused by major construction would likely deter shoppers and visitors to the town. Therefore, we suggest that the buffer area is substantially increased.
- Due to the cumulative impacts of the numerous NSIPS and the location of up to three Converter Stations adjacent to our town, we are concerned that the perception of Saxmundham as an attractive market town to visitors will change to that of an industrialised area. This may severely impact visitor numbers to the town and its tourism dependent businesses. We therefore require energy project developers in the area to consider, at the very least, to ensure that compensation

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<sup>27</sup> Table 15-2

<sup>28</sup> Paragraph 16.3.2

and mitigation are commensurate with the scale of disruption and damage, both in the short and long term.

### Local Business<sup>29</sup>

We question why only parts of Saxmundham to the east of the High Street are included in the local business study area. This is unacceptable as all businesses within the town, and in the neighbouring parishes of Benhall and Sternfield and Kelsale-cum-Carlton should be included.

The impact of the proposed Converter Station on Saxmundham and the neighbouring parishes will be devastating including loss of labour, traffic and transport delay, and loss of business during both the construction and operational phases.

### Community Facilities and Open Spaces<sup>30</sup>

Considering that the study area should incorporate all of Saxmundham, the following, whilst not exhaustive, should also be included:

Saxmundham Primary School	SET Saxmundham School	Fromus Green
Chantry Road Recreation Area	Seaman Avenue Recreation Area	Saxmundham Memorial Field
The Fromus Centre	St John The Baptist Church	Saxmundham Market Hall
Saxmundham Adventure Playground		

Consideration should be given to including the primary schools and churches in Benhall, Sternfield and Kelsale parishes.

### Visitor Attractions<sup>31</sup>

Considering that the study area should incorporate all of Saxmundham, the following, whilst not exhaustive, should also be included:

The Art Station	Saxmundham Museum
The Bell Hotel	Saxmundham Town Council Weekly and Monthly Markets

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<sup>29</sup> Paragraph 16.3.21

<sup>30</sup> Table 16-5

<sup>31</sup> Table 16-6

## Site Allocations – Development Land<sup>32</sup>

Considering that the study area should incorporate all of Saxmundham, it should be noted that Saxmundham is also identified in East Suffolk Council’s Local Plan as a growth node, with proposals for a ‘Garden Neighbourhood’ of 800 new dwellings, to be located between the railway line and A12. This development is due to be rolled out over the coming decade, including two new roundabouts to connect to a service station and a new employment zone to be created on the west of the A12.

## Proposed Scope of Assessment<sup>33</sup>

We note that direct impacts to residential property during the construction phase have been scoped out. The Applicant asserts that the proposed onshore scheme will be designed to avoid residential properties therefore it is not anticipated that there will be any demolitions, direct impacts or significant effects on residential properties.

Saxmundham Town Council insists that this aspect should be scoped in as the proposed Converter Station site is in close proximity to the urban settlement which will suffer direct impacts and significant affects.

## Tourist Accommodation<sup>34</sup>

We noted that the potential for impacts on the availability of tourism accommodation in East Suffolk due to use by the construction workforce is scoped out as the Applicant expects that the majority of the workforce will be sourced locally.

Saxmundham and the surrounding area is considered to be a high employment area however there is a skills shortage. Saxmundham Town Council contends that due to the cumulative impact of other NSIPs there will be a shortage of skilled labour which will lead to travelling workers being employed. This will affect the availability of all types of accommodation and thus this should be scoped in.

## Tourism Destinations<sup>35</sup>

Whilst scoped in, the Applicant states that ‘it is not anticipated that the construction of the proposed Onshore Scheme would result in a significant effect on tourism’.

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<sup>32</sup> Table 16-7

<sup>33</sup> Table 16-8

<sup>34</sup> Table 16-8

<sup>35</sup> Table 16-8



We differ in this opinion as various studies reflect a drastic decline in visitor numbers due to the various NSIPs in this area and, again, a cumulative impact assessment is lacking. A study conducted by the Suffolk Coast Destination Management Organisation reported<sup>36</sup> that a third of visitors are less likely to visit the Suffolk Coast during the construction of Sizewell C nuclear power station and EA1N and EA2 Sub Station at Friston. Many believe that the construction of energy projects will take away their reasons for visiting the area due to the impact to the tranquillity and natural surroundings, some are in principle opposed to nuclear or wind turbines and wish to make a stand, and others expect travel disruption to spoil their holiday experience. The addition of one or more Converter Stations at Saxmundham will further detrimentally impact this area as a tourism destination.

## Conclusion

As an identified consultation body, Saxmundham Town Council requests the Planning Inspectorate to consider this submission which sets out the impacts we consider will have a significant effect on the local environment before the Planning Inspectorate adopts its Scoping Opinion for information that the Applicant must include in its Environmental Statement.

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<sup>36</sup> [The Suffolk Coast - Tourism Research and Reports](#)



**Mrs. L. Beevor**  
Clerk of the Council

Town Hall  
Southwold  
IP18 6EF

## **Southwold Town Council's review of LionLink's EIA Scoping Report.**

### **Response to the Planning Inspectorate dated 2nd April 2024**

Dear Sirs

1. Cumulative Impact of East Anglia's Energy projects

STC notes that LionLink's Scoping Report has been prepared on the basis that it is a stand-alone project, although it references the possibility of co-ordinating with other projects (Sealink, Nautilus, EAN1/EA2), particularly with regard to the construction of a sub-station at Friston and nearby convertor stations. What the Report fails to address is the combined socio-economic effect of all these projects, together with Sizewell C and other potential offshore projects, over an extensive peak period of 6 years or more on a relatively small area of East Suffolk's Heritage Coast which is heavily dependent on tourism for its survival. In addition to heavy traffic flows on an ill-equipped road network and multiple major construction works, there is the inevitable perceived blighting of the whole area (including Southwold) that will deter visitors and have disastrous consequences for local businesses. We do not consider this wider threat to community well-being and livelihoods is addressed by the Report.

2. Local Issues to Landfall at Southwold

2.1 Southwold is unusual in that there is only one road (A1095) into and out of the town, which serves the busy High Street, Promenade and Beach, the Harbour and Caravan site, the Common with golf, rugby, soccer and cricket clubs and the marshes as well as the Landfall F area. When assessing socio-economic, recreation and tourism, the Scope should accordingly cover the whole of these areas and not be limited to the area depicted in Figure 16.1 with its 500 meter buffer to the scoping area.

2.2 The single access on the A1095 across Might's Bridge into Southwold is from the A12. Access to Might's Bridge through Reydon on the B1126 from Wangford is not fit for heavy loads and through Reydon on the B1127 from Wrentham is problematic when Potters Bridge floods with frequent road closure. At peak times, Southwold welcomes 5000 visitors per day and the Scoping Report doesn't properly address potential traffic congestion presented by this single access point which already serves heavy loads for Adnams Brewery, the caravan site and harbour marine business.

Telephone: [REDACTED]

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[www.southwoldtowncouncil.com](http://www.southwoldtowncouncil.com)

- 2.3 Once across Might's Bridge, access to the proposed Landfall F site from the A1095 would be left down Pier Avenue, a residential road, to the tourist hub of Southwold Pier, the Putting Green, Klondyke skate park, the Boating and Model Yacht ponds and the Blue Flag beach with its Beach Huts. Final access would then be through the Town's largest and busiest car and coach park to the adjacent landfall site. The Scoping Report totally underplays the tourist attractions in the vicinity and the impact of traffic congestion, noise, pollution and vibration on residents, visitors and businesses over the projected 20-month period of work on site at landfall.
- 2.4 Like many seaside towns, businesses in Southwold struggle to remain viable throughout the year and we do not consider the Scoping Report properly recognises the negative impact on the business community and its workforce if Southwold is chosen for landfall. Recruiting staff is difficult given the age demographic of the town and high property prices, and much of the workforce, in the absence of a viable public transport option, drive in; the access bottle neck would be a further disincentive to workers. An inevitable reduction in visitors would have a severe impact on the viability of these businesses.
- 2.5 In summary the EIA Report should include analysis to determine whether the local road transport network has sufficient capacity and is in good enough condition to accommodate LionLink construction traffic in addition to residential, business and tourist vehicles especially at the busy seasonal periods. The Scoping Report should address the requirement for a relief road from the A12 around Reydon to the landfall site which doesn't require access over Might's Bridge with the detrimental effects on both residents, visitors and businesses.

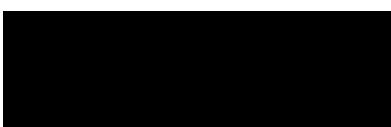
### 3. Environmental

Southwold has been one of only two recent recipients in Suffolk of Blue Flag status for its beaches and there is concern that any disturbance to the shoreline and offshore caused by the project might result in this status being denied in future. The scoping report should address this concern.

### 4. Coastal Erosion

Southwold is partly defended from the sea by a seawall maintained by the Environment Agency running north from the Pier to the northern limit of the scoped Landfall F area. This means the connection site is officially behind a "Hold the Line", but the Resilient Coast project and local flood and resilience board is concentrating on funding for a plan to deal with the outflanking of the Environment Agency's seawall defences to the North. One scenario is a managed retreat into Buss Creek which would flood any proposed connection station built at Landfall F. The present seawall has to be shored up regularly by the Environment Agency to prevent it being scoured by the sea and another concern is that the cable link into the sea would undermine its strength. A new wall would cost many millions. Alternatively drilling into the rapidly eroding cliffs at Easton Bavents would have serious environmental consequences. The scoping report does not address these issues, particularly given the expected minimum project life of 40 years.

Yours Faithfully



L J Beavor

Southwold Town Clerk





LionLink – National Grid Ventures

EIA Scoping Report

Suffolk County Council Response

04 April 2024

## Contents

1. Introduction .....	2
2. Contents of this response .....	2
3. General comments.....	2
4. Archaeology .....	4
5. Ecology .....	6
6. Economic Development/ Socioeconomic .....	6
7. Joint Emergency Planning Unit .....	7
8. Highways .....	8
9. Lead Local Flood Authority .....	8
10. Landscape and Visual .....	9
11. Public Health .....	11
12. Public Rights of Way .....	12
13. Cumulative Effects Assessment .....	13
Appendix A – Detailed Technical comments .....	14
14. SCC Archaeology .....	14
15. SCC Ecology .....	14
16. SCC Economic Development .....	19
17. SCC Lead Local Flood Authority .....	22
18. SCC Highways .....	23
19. SCC Landscape and Visual.....	28
20. SCC Public Rights of Way .....	43

## 1. Introduction

- 1.1. This document is Suffolk County Council's (SCC) response to The Planning Inspectorate's request, dated 7 March 2024, for comments to inform the adoption of an Environmental Impact Assessment (EIA) Scoping Opinion by the Planning Inspectorate regarding the National Grid Ventures (NGV) proposals for a multipurpose interconnector, known as LionLink, including onshore infrastructure. Whilst the proposed Applicant is described as an entity known as National Grid LionLink Limited (NGLLL), that entity is stated to have a business as a Dormant Company (according to Companies House records) and is described in the Scoping Report as "*one aspect of the NGV portfolio*" (at paragraph 1.2.3). SCC will therefore refer to the parent entity, NGV, as the relevant body concerned with the request for an EIA Scoping Opinion.
- 1.2. This response contains the technical comments of staff directly employed by SCC, specifically on the question of the adoption of an EIA Scoping Opinion and is not intended to make comments on the merits of the LionLink proposal itself, which will be dealt with separately.

## 2. Contents of this response

- 2.1. The Response comprises this section as a summary and the accompanying Appendix A. The summary begins with some general comments on NGV's approach to scoping for its LionLink project. The remainder of this summary sets out the main elements of the technical views of staff employed directly by SCC.
- 2.2. Appendix A provides the technical comments in full all of which should be considered as an integral part of SCC's substantive comments.

## 3. General comments

- 3.1. The evidence presented by National Grid Ventures for excluding the option of bringing cables ashore at Aldeburgh is extremely limited and is therefore not presented in a way which alternatives can be readily tested.
- 3.2. Furthermore, the consequences of the exclusion of Aldeburgh appear likely to have significant adverse harm to the communities, property, amenity, environmental assets, and other interests, which are all aspects of the receiving environment likely to be impacted by the project and which are therefore of direct concern to those being consulted.
- 3.3. An illustration of the significance of the exclusion of a landfall at Aldeburgh from the assessment of the environmental effects of the project as proposed in the Scoping Report, and the consideration only of a landfall at either Southwold or Walberswick, can be seen from the scale and extent of the Onshore corridors required for the project, as shown on Figure 3-2 of the Onshore Figures, in combination with Figure 3-1 of the Onshore Figures, which shows the proposed Friston Substation (and options considered for converter stations). It is plain from comparing these two Figures that the Onshore corridor

from Aldeburgh to Friston is shorter, more direct, and requires much less land than either of the Onshore corridors from Southwold or Walberswick to Friston. Whilst the extent of land take is not the only measure of environmental effects, it is a significant component and if the shorter and more direct corridor is not to be further assessed, there needs to be a clear and compelling reason, supported by cogent evidence, for its rejection. That information is not provided in the Scoping Report in a manner that would allow SCC to make a fully informed consultation response on the adequacy of the reasoning for NGV's limited choice of landfall sites for further assessment. The exclusion of Aldeburgh as a landfall location also materially limits the opportunity for co-ordination and co-location of this project with elements of the Sea Link project which is being promoted by National Grid Electricity Transmission (NGET) and which envisages a landfall for its offshore cables in the Aldeburgh location. The Sea Link project is currently anticipated to be submitted as a NSIP application later in 2024.

- 3.4. Suffolk County Council considers therefore, that there is insufficient information for those consulted to give intelligent consideration to the scoping consultation.
- 3.5. Suffolk County Council considers that there is a significant element of predetermination, in this instance, because although the proposals are still at a formative stage, there is an absence of substantiated evidence to support the contention that Southwold or Walberswick should be the landfall for this project, to the exclusion of Aldeburgh.
- 3.6. Therefore, the County Council considers that this scoping consultation does not meet the requirements of the first two Gunning Principles, which consist of four rules, which if followed, are designed to make consultation fair and a worthwhile exercise (see the case of R v London Borough of Brent Council ex parte Gunning (1985) 84 LGR 168). The Gunning Principles were endorsed by the Supreme Court in R (Moseley) v Haringey LBC [2014] UKSC 56. Principle 1 is *"that consultation must be at a time when proposals are still at a formative stage"* and Principle 2 is that *"the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response."*
- 3.7. SCC should make it clear that this concern does not relate to the actions of the Planning Inspectorate, which can only seek consultation responses on the material that NGV has chosen to put forward, but to the actions of NGV in the manner in which it has formulated its Scoping Report and in the limited information that NGV has provided to support the position adopted in the Scoping Report that a landfall location for the project should be at either Southwold or Walberswick, to the exclusion of a location at Aldeburgh.
- 3.8. The preference of the County Council would be for the applicant's evidence, in relation to landfall selection, to be tested in full by the Examining Authority and SCC's current impression is that a landfall at Aldeburgh is likely to be preferable in terms of opportunities for minimising environmental effects. However, it is recognised that this is, like the current position of the project promoter, a preference not based on evidence.



- 3.9. Therefore, in order to satisfy the Gunning principles, it is suggested that the landfall at Aldeburgh remains in the scope of the EIA for the time being, so that robust, detailed, and testable evidence, that supports, or undermines, the project promoter's preference for the exclusion of Aldeburgh as a potential as a landfall, can be provided at the statutory consultation (s42) stage.
- 3.10. Suffolk County Council considers that this would be an appropriate and reasonable way forward to ensure that, at that stage, the consultees, especially those directly impacted by the scheme, will have all the information necessary to draw an informed conclusion, and the applicant will have sufficient time to gather, and present, that information.
- 3.11. Effective presentation of evidence at this stage would allow the case or otherwise for the proposed approach to be demonstrably tested in line with National Policy Statement for Electricity Networks Infrastructure (EN-5)<sup>1</sup> which in para 2.13.18 states that applicants should seek to demonstrate the reduced overall impacts from co-ordination and how the onshore connection locations have been identified.

## 4. Archaeology

- 4.1. There is high archaeological potential for all current areas being considered, the majority of which have not yet been subject to systematic archaeological investigation, therefore full assessment is required at the earliest opportunity.
- 4.2. The archaeological implications of multiple large infrastructure schemes in this landscape are cumulatively heightening for every project. Suffolk County Council Archaeological Service (SCCAS) notes that possibilities for co-location of landfall (Thorpeness/Aldeburgh) and the cable route of this scheme with the Sea Link project has been discounted in this EIA scoping. SCCAS would recommend that this is reconsidered due to the large area proposed by the current EIA document and the cumulative impacts when combined with the other large infrastructure schemes in East Suffolk which could be reduced if areas are shared.
- 4.3. SCCAS is aware that the archaeological consultants for both Lion Link and Sea Link have been unable to communicate and share data. This is unsatisfactory. It is causing duplication of work such as geophysical survey at the Saxmundham converter station location. This also appears to be an issue at the Friston Substation site with geophysics and trenching commissioned Scottish Power Renewables. This is inhibiting full assessment of impacts by the respective teams.
- 4.4. The Sea Link survey at the converter site and survey and subsequent trenching and excavation by Scottish Power Renewables in the local area illustrate how much information is added to HER data through systematic survey, realising archaeological potential, as a significant number of archaeological sites have been defined which were not previously recorded on the County HER, or associated with finds scatter or cropmark evidence.

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<sup>1</sup> [Electricity Networks National Policy Statement - EN-5 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614242/en-5-national-policy-statement-for-electricity-networks-infrastructure.pdf)

- 4.5. The results from other projects are also showing that there is an enormous amount of important archaeology surviving in this landscape, much of which we previously knew nothing about. As such, the need for early, full assessment (desk-based surveys, geophysics, earthwork survey AND trial trenching) is becoming increasingly more important for every scheme (to inform the finalisation of the scheme routing/design) and has the potential to become a point of objection when we get to examination if not undertaken.
- 4.6. It is important to highlight at this early stage that without full assessment, it will not be possible to fully understand the archaeological impacts of proposals and to enable informed decisions to be made.
- 4.7. The longer the cable routes, the greater the potential archaeological impacts and the scale and scope of investigation and mitigation. Where cables pass through watercourses there is potential for well-preserved stratified sites in and on the valley sides as well as palaeo-environmental remains.
- 4.8. There should not be an assumption that data within the Historic Environment Record (HER) is of local significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets. Sites of archaeological potential which have not yet been subject to systematic assessment (and are therefore currently of unknown significance) should also be considered.
- 4.9. All onshore elements of the scheme (for example, landfall sites, converter station sites, grid connection substation site, underground cable corridors, jointing bays, link boxes, Horizontal Directional Drilling (HDD) pits and any other impacts associated with the scheme for example, haul roads, compounds, planting and ecological mitigation, offsite transport improvements etc.) have the potential to damage or destroy any surviving archaeological remains so all elements of the scheme should be scoped in for archaeological assessment. As well as impacts during construction work, activity during site operation as well as decommissioning work (including any associated site compounds) will need to be scoped in for a consideration of archaeological impacts given the potential for remains which will need to be preserved in situ and will therefore need to be protected from disturbance throughout all phases.
- 4.10. As has been shown by other Nationally Significant Infrastructure Projects in the region time will be a critical factor. Archaeological and heritage assessments and mitigation phases should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken (e.g. taking into account agricultural cycles and commencing landowner negotiations at the earliest opportunity) and also fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule.
- 4.11. Several large projects in the area at a given time (which is likely given the timeframes of other schemes) may put pressure on available archaeological work forces which is something to be aware of.

4.12. No geotechnical investigations of any kind should take place without archaeological oversight from SCCAS. Depending on the level of works we may require prior geophysical survey, trial trench evaluation, palaeoenvironmental survey or continuous archaeological monitoring.

## **5. Ecology**

- 5.1. Although generally comprehensive, there are, we believe, omissions in the Report which should be addressed prior to the Statutory Consultation in 2025.
- 5.2. We are concerned that this area of East Suffolk will suffer considerably from disturbance, severed and lost habitat, that the site of the sub-station at Friston will become a vast hard-standing and that biodiversity will, as a consequence, suffer massive disturbance and will be lost or displaced for many, many years.
- 5.3. The Report does not address Biodiversity Net Gain (which, it is anticipated, will be mandatory for NSIPs by the time the DCO is submitted).
- 5.4. Proper co-ordination with the other projects proposed for this area (e.g., SZC, Nautilus, Sea Link and SPR projects) must be made without delay in order to minimise and mitigate the anticipated harm, disturbance and loss to biodiversity.
- 5.5. An over-arching Environmental Strategy/ Review Group would be of real benefit to all parties.
- 5.6. Under that, an Ecology Working Group should be formed as soon as is practical, again providing good lines of communication between the various professionals involved.

## **6. Economic Development/ Socioeconomic**

- 6.1. The boundaries used for the labour market area are considered to be inappropriate and do not reflect commuting patterns for construction workers for infrastructure projects and excludes major sources of labour.
- 6.2. A wider labour market area would also need to take into account the impact of other Nationally Significant Infrastructure Projects with a concurrent construction phase to this project as this will likely further widen the labour market area due to high labour demands.
- 6.3. Impacts on tourism accommodation should not be scoped out as although it is stated that the majority of the workforce is expected to be locally sourced, the demand on labour is likely to draw workers from a wider area than usual.
- 6.4. The cumulative impact of major infrastructure projects in the area needs to be comprehensive when considering impact on the labour market. In particular, addressing mismatch between labour supply and demand. How this issue will be addressed needs to be considered in full.

- 6.5. We expect to have a detailed workforce profile in future submissions set against the construction timeline.
- 6.6. There is an absence of reference to key documents and data sources, such as the Technical Legacy Report and Suffolk County Council's Energy Infrastructure and Climate Adaptive Infrastructure Policy.
- 6.7. We expect the applicant to develop the local talent pool, support apprenticeship opportunities for local people, have clear plans to drive the supply chain's engagement in skills and employment outcomes, incorporate social value measures, establish and implement a Skills Plan and engage proactively with the Regional Skills Coordination Function at Suffolk County Council.

## **7. Joint Emergency Planning Unit**

### **Joint Emergency Planning Unit Comments**

- 7.1. SCC has a statutory duty under Radiation Emergency Preparedness and Public Information Regulations (2019 REPIR 19) to consider the development with respect to the existing Sizewell off-site emergency plan due to the proposed site(s) being within 10 km of Sizewell B power station.
- 7.2. An emergency plan for the construction would be required which covers protecting construction staff during any site or radiation emergency and it shows the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.

### **SCC Emergency Planning Unit**

- 7.3. The location of the construction sites within the Extended and Outline Emergency Planning Zones for Sizewell B mean that SCC has the statutory duty under REPIR 19 to consider the impacts of the development with respect to the existing arrangements contained in the Sizewell Off-Site Radiation Emergency Plan.
- 7.4. This will require, prior to commencement, emergency plans for this construction to be produced that covers the arrangements for protecting construction site staff during any Sizewell radiation emergency and ensuring that the development does not adversely affect existing activities by the Emergency Services and other agencies to be effectively respond to an incident at Sizewell B.

### **Transport and traffic control measures.**

- 7.5. The concurrent projects in this area will place significant challenges on the emergency services and other agency's ability to respond to emergencies and also if required, to conduct an effective evacuation.

- 7.6. Whilst the Construction Traffic Management Plan will identify that HGV movements will take place off peak whilst this might ease congestion, emergencies and any requirement for response could take place at any time of day.
- 7.7. The use of historic traffic flow data will not take into account the concurrent volumes of traffic related to other new or emerging construction projects.

### **Health and Wellbeing.**

- 7.8. This and other concurrent projects have heightened anxiety amongst the local population in the impacts of the effectiveness of the radiation emergency plan and the ability of the emergency services to respond to an incident at Sizewell B and also to conduct an effective evacuation.

## **8. Highways**

- 8.1. The geographical scope of study cannot be agreed until we have more information on routes, accesses and forecast traffic.
- 8.2. Use of IEMA assessment methodology would be acceptable to SCC but the details should be discussed and agreed with the LHA. There is insufficient data to do so at present.
- 8.3. Description of highway network shows it more suitable for construction traffic than it is and that the resilience of the highway network to support the cumulative energy projects during their operational phase is not included within the scope.
- 8.4. Details on the Management Plans and Controls needs to be discussed and agreed with the LHA and a Travel Plan provided for construction workers.
- 8.5. Abnormal indivisible loads (AILs) should not be scoped out from the assessment of construction traffic impacts (as proposed in Table 15-2). Whilst these AILs may be planned for non-peak periods, the local road network includes many roads of restricted widths, with limited or no footways, and roadside heritage assets, and during non-peak periods there is significant use by visitors, by local residents, and by non-motorised users. In addition, due to the large number of infrastructure projects affecting the local highway network at Friston, AIL and HGV movements in the Operational Phase should also be scoped into the Transport Assessment.

## **9. Lead Local Flood Authority**

- 9.1. SCC will act as Lead Local Flood Authority (LLFA) for the LionLink proposals.
- 9.2. The LLFA would encourage cross-examination with the prior SPR EIA-process and inclusion of the Friston Surface Water Management plan to enhance understanding of the catchment area.

- 9.3. The LLFA does not distinguish between 'larger' and 'minor' watercourses.
- 9.4. 'Flood risk from the proposed Onshore Scheme to surrounding area' should be scoped in
- 9.5. Main rivers should be scoped in for the operational phase.

## **10. Landscape and Visual**

### **Landfall and cable route**

- 10.1. SCC considers that the evidence shared by the Applicant to date does not conclusively demonstrate that landfall at Aldeburgh/Thorpeness would overall cause greater environmental harm than the proposed and preferred landfall options north of Southwold or in Walberswick.
- 10.2. SCC considers that the Landfall at Aldeburgh/Thorpeness should be scoped back in for the purposes of the Section 42, Preliminary Environmental Information Report.

### **Implications of Levelling Up and Regeneration Act (LURA), 2023**

- 10.3. SCC considers that the Applicant needs to demonstrate in the Environmental Statement how it fulfils the new duty under LURA, 2023

### **Relationship with other parts of the EIA**

- 10.4. The Scoping Report does not explicitly recognise the relationships between landscape and visual matters and other parts of the EIA, specifically, ecology, historic environment, socioeconomics and tourism, and traffic transport and rights of way.

### **Data sources and baseline**

- 10.5. The relevant data sources proposed appear acceptable, but SCC considers that the Designation History Series which relates to the Suffolk Coast and Heaths AONB, the Suffolk, South Norfolk, and North Essex Seascape Character Assessment and the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) ENDORSED-SCH-AONB-Position-Statement-on-Development-in-Setting-of-AONB-2015.pdf ([coastandheaths-nl.org.uk](http://coastandheaths-nl.org.uk)) should also be included in the suite of documents and considered.
- 10.6. The applicant should also be aware of the cultural importance of the Suffolk coast including the Aldeburgh/Snape area.

### **Impacts on the fabric of the landscape**

- 10.7. An Arboricultural strategy will be required, and SCC expects that all trees will be appropriately identified, mapped, and considered.
- 10.8. A comprehensive approach to important hedgerows under the Hedgerow Regulations 1997 will be required.

## **LVIA Methodology**

10.9. SCC considers that the methodology for the assessment of landscape and visual matters to be broadly acceptable, provided point A-K (Appendix 1) can be satisfactorily addressed.

## **Viewpoint Locations**

10.10. It is welcome that the Applicant is committed to agreeing the representative viewpoints with SCC, ESC and the Suffolk and Essex Coast and Heaths National Landscape Partnership (para. 31.7.37).

10.11. Given the scale and sensitivity of the project on its own, and in combination with other projects, and given the very high level of public interest, the Council considers it is also necessary to include both specific viewpoints and illustrative viewpoints, as discussed in paragraph 6.19 of GLIVIA 3.

## **Visual representations - methodology**

10.12. The Applicant should provide, as soon as is reasonably practicable, a detailed methodology and rationale for the preparation and presentation of visualisations. Agreement on methodology, with the relevant local authorities, supported with sample pages for each visualisation type, would be expected prior to the preparation of the visualisations.

## **Intra-project effects of multiple aspects on receptors**

10.13. The methodology for intra-project effects of multiple aspects on receptors as presented in the Scoping Report does not appear to capture the essence of the issues. While Table 29-1 Potential for intra projects effects onshore reflects on how topic areas might be interlinked, it does not examine the cumulative effects that various elements or sections of the scheme could have on certain receptors.

## **Inter project effects assessment**

10.14. SCC considers that a number of the current suggestions for maximum Zones of Influence (Zoi) are not acceptable.

10.15. SCC does not agree with para. 29.3.21 of the Scoping Report 'that any development with a consent older than five years will have been built out or lapsed after the three-year consent for commencement has passed. Therefore, it is proposed that any development with a consent older than five years will be excluded from the long list.'

## **Design measures**

10.16. SCC considers that the Mitigation Hierarchy must be applied to its full extent and that this needs to be anchored into the design principles.

10.17. SCC considers that it would be best practice to aim for a biodiversity net gain of no less than 10%.

10.18. SCC considers that more weight should be given to the importance of Good Design, in line with NPS EN-1 (2023/2024) and the NIC Design Group's, Design Principles for National Infrastructure (November 2020). SCC would support the appointment of a Design Champion and the use of a design review panel, a design code/design approach document, and an outline of the design process, setting out key stakeholders, consultees, and the community engagement processes.

## 11. Public Health

11.1. There are good key population health indicators under each section. Could a question on community engagement, and communication be added to demonstrate that residents are kept updated on the development and have an opportunity to discuss any points they wish to raise if any occur.

11.2. We would welcome frequent communication to inform residents of development plans and the impact this will have on them e.g. on health, mental wellbeing, and contacts of who they can speak to, either to mitigate what is happening or what support they can get. This can also include connecting with Suffolk and Northeast Essex Integrated Care Partnership/Board (SNEE ICP/B). SNEE ICB should be involved in conversations on any health infrastructure requirements during the excess amount of people working and living in areas of NSIP developments and will have access to health services.

11.3. There is no mention of neurodiversity – although vulnerabilities, and disability is referenced. There is nothing on how information will be formatted so everyone can understand what is happening on this NSIP in the areas concerned.

11.4. To ensure the organisations eg National Grid, have good mental health policies in place, as the highest number of suicides are in Construction industries. Hope the companies have a mental health suicide prevention policy.

11.5. We are pleased to see mitigations in plan on Air Quality, Noise Pollution and Contaminated soil/land in addition to reduction of routes used by construction traffic.

11.6. We are pleased to see references on employing and training locally. There will be a huge impact on Tourism with people visiting areas of NSIP developments, for example holiday lets and local businesses who rely on tourism. It will be good to have Suffolk Growth involved in these conversations if they haven't yet been contacted.

11.7. Accommodation plans should consider what will be available and affordable during the developments if there is a shortage of local employees available, as well as what other local services will be impacted by excess number of workers e.g. leisure centres. Opportunities to encourage workers to be more active and reduce risky behaviours, e.g. smoking, alcohol, and healthy eating should be considered.



## 12. Public Rights of Way

- 12.1. It is disappointing that the applicant has chosen not to holistically consider the potential impact on the PRow network and its amenity value to its receptors as a separate theme but has instead split this aspect across a number of other chapters, namely health and wellbeing, landscape and visual amenity, traffic and transport and socio-economic, recreation and tourism. As a result, the scope and proposed methodologies fail to recognise the importance of the quality of the experience enjoyed by the public when going for a walk or ride.
- 12.2. Therefore, SCC's position is that public rights of way and amenity should be dealt with in their own chapter of the environmental impact assessment so that the impact on both the physical resource and the amenity value of the public rights of way and access network can be properly understood, including interactions between different parts of the scheme, both temporally and spatially.
- 12.3. This should include the effect on the physical resource from temporary or permanent closures and diversions, and also on the quality of user experience. An example is provided in the full technical comments for PRow.
- 12.4. Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out SCC's commitment to ensuring and promoting sustainable travel options for all.
- 12.5. The scoping report should also consider the assessment of impact from pre-commencement works such as archaeological, ecological, ground and drainage investigations, creation of accesses and site clearance which can have a direct impact on PRow and their users.
- 12.6. SCC requests that a pre-commencement management plan including mitigation measures should be produced as part of the DCO application.
- 12.7. The public rights of way network is a community facility and important amenity, particularly in rural Suffolk and needs to be considered as such when scoping and assessing the impact on health and wellbeing.
- 12.8. The baseline for PRow in Chapter 15 Traffic and Transport is incomplete and the applicant will need to provide sufficient information, namely the correct identification of the legal status (and width where known) of the PRow is needed to ensure a comprehensive and accurate assessment of impact on the different types of PRow user and the appropriate mitigation measures.
- 12.9. SCC considers that the scoping and assessment of impact on pedestrian and cycle amenity in the Traffic & Transport chapter does not actually cover the assessment of impact on receptors using the PRow network. Although welcoming the recognition of the potential for works leading to a decline in pedestrian and cycle amenity, the approach taken by the applicant solely relates to cycling and pedestrian facilities integrated with the road network and

not the PROW network, the vast majority of which are entirely separate from the road network.

- 12.10. The scope of assessment, the sensitivity of receptors and the definition of amenity is limited to pedestrians and cyclists without recognition that the different types of PROW allow for not only pedestrians and cyclists but also equestrians, carriage driving and off road vehicle users.
- 12.11. SCC consider that within 'Socioeconomics, Recreation and Tourism', the PROW network should itself be considered a visitor attraction as they play a vitally important part in the offer and function of the visitor economy enabling access to the countryside and wildlife of the Suffolk coast area.
- 12.12. Similarly, SCC believes that the applicant should include all the PROW network in scope as recreational routes, as this is one of the fundamental roles they serve for local communities and the visitor economy as well as enabling active travel.
- 12.13. The baseline data is incomplete, omitting the King Charles III England Coast Path National Trail and the many other local authority promoted walks and rides.
- 12.14. SCC do not believe that PROW & amenity has been adequately addressed due to the 'salami slicing' approach taken by the applicant. This shortfall is further compounded by the fact that the intra project cumulative effects matrix is failing to make the linkages between the many chapters in which PROW and amenity is considered.
- 12.15. If the applicant is not going to consider PROW & amenity as a separate theme in this application, then the intra-project effects must do so.
- 12.16. SCC is very concerned that the lack of a single assessment approach for PROW, access and amenity weakens the recognition of, and assessment of the cumulative effects, in particular the repeated closure of PROW and disruption to the public users, and the increased duration of these impacts as a result of the stream of NSIPs in a relatively small geographical area.

### **13. Cumulative Effects Assessment**

- 13.1. The cumulative impacts with other projects in the area, such as, but not limited to, Sizewell C, will need to be fully considered.
- 13.2. SCC considers that the proposals for CEA are not currently satisfactory and will need to ensure that they adequately address the detailed concerns in Appendix A

## Appendix A – Detailed Technical comments

### 14. SCC Archaeology

#### 14.1. SCCAS comments on Lion Link EIA Scoping Report

- 11.2.2 There should be details of impacts on below ground heritage assets.
- 11.2.3 11.2.3 It should be noted that unknown below ground heritage assets are very likely to be identified by trenching or other means, recent NSIPs in the area have discovered large quantities of previously unknown archaeological remains.
- 11.3.2.1, Some trenching has been done for other schemes (SPR and National Grid Transmission, the results should be obtained)
- 11.3.25 Geophysical survey (for other schemes) shows more (previously unknown) archaeology, results should be obtained.
- 11.5.5 Targeted in the sense that anywhere with below ground impacts will need trenching, not a lower sample % or only trenching on known assets.
- The OWSI should also detail all provisions for post excavation analysis and reporting and archiving (including digital archiving).
- 11.5.7 All the points in this section would need to be detailed in the OWSI and approved by SCCAS.
- 11.8.4 SCCAS agrees.

### 15. SCC Ecology

- 15.1. The Report acknowledges that the area under scrutiny is a “predominantly rural setting” (1.6.4) and envisages a cable corridor that would meet land at either Southwold or Walberswick and then proceed by way of Reydon, Wangford, Uggeshall and Wenhaston to Blythburgh, Westleton, Middleton and Saxmundham before arriving at Friston where a sub-station will be constructed (either alongside or as part of the other projects envisaged for that site).
- 15.2. The Report states that Habitats Regulations Assessment, Marine Conservation Zone Assessment, Water Framework Directive Compliance Assessment and Flood Risk Assessment will be carried out.
- 15.3. All of the foregoing must be assessed in combination with the other major (including NSIP) schemes being proposed in this part of East Suffolk.
- 15.4. From a terrestrial ecology perspective, we will be particularly interested to understand the in-combination effects upon biodiversity when all impacts of the major schemes are considered together.
- 15.5. We have concerns about the impacts of new access roads being constructed and how this will impact upon existing wildlife corridors and wider ecological connectivity. This should be addressed in the Environmental Statement (ES) when submitted.

15.6. Further, we understand that the cable corridor must be a certain width for safety purposes but are concerned that, where cutting through features such as hedgerows or tree lines, that the minimum width only is taken (and can this be reduced further than that in the Report?). We anticipate that micro-routing will be employed to avoid the loss of important features (such as, but not limited to, mature trees).

### **Chapter 8, Ecology & Biodiversity:**

15.7. The Chapter mentions that Ancient Woodland will be considered in the Historic Environment Chapter (11) but my (albeit brief) perusal of this Chapter found no mention of Ancient Woodland.

15.8. The proper place, in my opinion, to discuss Ancient Woodland is within the Ecology & Biodiversity Chapter (but, by all means also discuss in Historic Environment as well).

15.9. I would add that SBIS is in the process of updating records for Ancient Trees, hedgerows and other features of relevance and, it is very important to note, not all Ancient Woodland has been designated (as the parcels may have been, e.g., too small in the past) but this issue is being addressed by SBIS and I suggest that LionLink's Ecology Team keep in close contact with SBIS for updates as and when they are available.

15.10. We note that each of the following groups are being discussed by the proposed Applicant:

- Bats
- Breeding Birds
- Badger
- Otter
- Water Vole
- Hazel Dormouse
- Amphibians (GCN, Common Toad, Natterjack Toad)
- Reptiles (Common Lizard, Slow Worm, Grass Snake, Adder)
- Invertebrates
- Aquatic species (n.b. European Eel)

15.11. We think that this list is largely complete but make the following comments:

- Are eDNA surveys (apart from those for GCN) thought to be effective in identifying Otter and Eel? We would be grateful if best practice in terms of these species could be referred to (we are aware of the use of eDNA for GCN though).
- One of the Suffolk Character Species is Swift (*Apus apus*) and this should, most certainly, be added to the "target species" list offered in the Report.
- Invasive Non-Native Species (INNS) are mentioned in the Report but Deer have been omitted. I think that it is important to have an understanding of Deer numbers on the areas to be impacted (especially Muntjac and Chinese Water Deer) as they can have a devastating impact on new tree and shrub growth. Any Landscape and Ecology Management Plan (LEMP)

submitted for this proposal should have a Deer Management and Monitoring Plan as a key element.

- Also, in respect of INNS, there is no mention of American Mink (*Neovison vison*). We are aware that other projects in the area are monitoring the presence/absence of this species and, if they are encountered, we expect management to be covered in the LEMP.
- Regarding Badger (*Meles meles*), this species is very successful, highly mobile, very widespread and certain to be encountered during the delivery of the proposal. A constant weather eye must be kept open for this species...

### **Re Preliminary Ecological Appraisal Report:**

15.12. We note that the proposed Applicant has entered into discussions with Natural England regarding aspects of the PEA. We have found that Ecology Working Groups that we have set up with various other NSIPs being proposed and delivered in East Suffolk have been very helpful to ALL parties involved.

15.13. We would encourage the Applicant to set up an Ecology Working Group for LionLink as soon as possible as we believe that it would go a long way to addressing potential issues before the surveyors' boots have even hit the ground.

15.14. We would also expect that all biological records are submitted to Suffolk Biodiversity Information Service (SBIS).

15.15. We will look forward to discussing the parameters of the PEA survey work with LionLink, by way of an Ecology Working Group in due course.

15.16. We suggest that the EWG consists of:

- Natural England
- Environment Agency
- East Suffolk Council
- Suffolk Wildlife Trust
- RSPB
- National Trust
- Suffolk County Council

15.17. Other organisations (such as the MMO and, perhaps IDBs) may also need to contribute to an EWG from time-to-time.

### **Other Relevant Chapters:**

15.18. Ecology and Biodiversity are relevant considerations for each of the following:

15.19. Chapter 9: Geology, Impacts on Groundwater: because of species and habitats reliant upon ground water of the right quality, quantity and consistency.

15.20. Chapter 10: Health & Well-being: the links between the natural world and good health and well-being are many and recognised. Impacts upon the

natural environment will, therefore, have an impact upon the health and well-being of residents, visitors and tourists.

- 15.21. Chapter 11: Historic Environment: Ancient Woodland was intended to be discussed in this Chapter but I was unable to locate it.
- 15.22. Chapter 12: Hydrology, Hydrogeology and Drainage: as with Chapter 9 and to include watercourse, and so on.
- 15.23. Chapter 13: Landscape and Visual Amenity: obviously, although distinct differences between the disciplines, the two (Ecology and Landscape) are clearly inextricably linked.
- 15.24. Chapter 14: Noise and Vibration: an obvious disturbance factor for wildlife.
- 15.25. Chapter 15: Traffic and Transport: apart from disturbance, noise, pollution and other negative impacts upon biodiversity, constructing roads and ancillaries (such as access/bell-mouths) the loss of habitat (through physical removal or sterilisation) are very important factors.
- 15.26. Chapter 16: Socio-Economics, Recreation and Tourism: This part of East Suffolk is, rightfully, especially popular with tourists who come to see the wildlife. Obvious connection if wildlife is being disturbed or displaced by construction and operational activities
- 15.27. Chapter 17: Material Impacts and Waste: Creation, removal and storage of waste all have the potential to impact negatively upon wildlife.
- 15.28. Chapter 18: Marine Physical Environment: Although we are terrestrial ecologists, we are well aware that marine life and land-based wildlife are inextricably linked (e.g., land nesting birds that feed on sea life and marine mammals such as Seal that use land in part of their biological cycle).
- 15.29. Chapter 19: Intertidal and Subtidal Benthic Ecology: we appreciate that the proper competent authorities for these groups are NE, EA, MMO, IFCA and other such bodies but we are interested for similar reasons as set out regarding Chapter 19 above.
- 15.30. Chapter 20: Fish and Shellfish: Interested because of the reasons set out above (to include Terns and Kittiwakes).
- 15.31. Chapter 21: Intertidal and Offshore Ornithology: as above.
- 15.32. Chapter 22: Marine Mammals and Marine Reptiles: as above.
- 15.33. It is clear that all of the above disciplines have considerable interest for Ecologists (even terrestrial Ecologists such as at SCC).
- 15.34. We recommend that an over-arching Environmental Strategy/Review Group is constituted, comprised of Senior Officers from the relevant organisations. Below this can sit the specialist groups – such as an Ecology Working Group.

15.35. We believe that such a body will be of great assistance to LionLink and to the various bodies that will, in due course, be called upon to discharge the many Development Consent Order Requirements (as well as fostering lines of communication and good working relationships, all to the benefit of all parties involved).

**Generally:**

15.36. A well-considered Landscape and Environment Management Plan will be an essential tool in this matter and we believe that an Ecology Working Group will be of real benefit to the Applicant in piecing such a document together.

15.37. As for the Environmental Statement (ES), we raised a number of points in our earlier response but believe that most of them are worth repeating so that they can be addressed within the ES:

- There are a notable number of NSIP scale projects in the vicinity. How will the in-combination effects of this project impact upon their proposed mitigation, compensation and enhancement measures? How will this project impact upon the Conservation Objectives of nearby European Designated Sites? How will this project impact on other designated sites such as SSSIs and CWSs?
- Is a “new” route for this tranche of cables more or less damaging and disturbing to wildlife than re-using existing proposals?
- How much will this proposal impact upon wildlife displaced to the Applicant’s preferred areas by activities at the several other projects in the area?
- Will the disturbance caused by this proposal displace wildlife to areas impacted upon by the other NSIPs in the area?
- How much liaison will there be between those wildlife and habitat professionals working on this proposal with others in the vicinity?
- What sort of monitoring and mitigation will be in place? How will this interact with other schemes in the area?
- How long will this proposal take to deliver on the ground? Will there be mitigation by timings to avoid the most sensitive seasons for the species most likely to use the area?
- What will the site (both cable route and sub-station) look like during construction (in terms of attractiveness to wildlife)?
- How will ecological connectivity be maintained whilst waiting for mitigation measures to take effect?

- What will this site look like (for wildlife) in five years, ten years and fifteen years after the works?
- How will enhancement/Biodiversity Net Gain be delivered?
- What sort of liaison between the deliverers of the various projects proposed for this area of Suffolk will there be in order to minimise disturbance and damage? How will this be achieved?

15.38. It is our view that these points are still relevant and require addressing.

### **Conclusion:**

15.39. If the proposal to create a cable route from the North Sea to Friston was the only project going on in the area, it would still be a massive undertaking and cause considerable disturbance to and loss of wildlife and habitats.

15.40. In combination with the other major projects in the area, the consequences of this proposal along with the others give rise to real concern that habitat will be lost and not recover for many, many years and that displaced wildlife will be lost because, put simply, there is nowhere else for it to go.

15.41. We do not think it at all unreasonable for the Applicant to consult and work with the other deliverers of related infrastructure in East Suffolk.

15.42. We believe that constituting an Ecology Working Group at the earliest opportunity will be of great assistance to all and commend that course of action.

## **16. SCC Economic Development**

16.1. Figure 16-1 shows use of East Suffolk Council administrative boundary for the labour market area. This is unlikely to adequately reflect the labour market area and commuting patterns for construction workers for infrastructure projects and, in particular, excludes Ipswich as a source of labour. SCC recommends that this study area is extended, particularly due to the large number of other Nationally Significant Infrastructure Projects which will be under construction in the region (at least 8 in Suffolk alone, including Sizewell C as well as Sea Link and Norwich to Tilbury, both power infrastructure projects). CITB have estimated that an additional 19,050 construction workers needed up until 2027 to deliver the planned work (CITB East of England outlook 2023-2027). Paragraph 16.3.12 that East Suffolk and Suffolk as a whole has a lower-than-average proportion of the population of working age and economically active. When considering these quoted statistics alongside the anticipated labour demand due to the number of NSIPs in the region, it is likely to mean an even wider labour market area to fill the number of roles that will be available. We expect the applicant to take this into consideration when developing a workforce profile and its origins and will need to strongly evidence all their assumptions.



- 16.2. This recommended widening of the study area to more accurately reflect commuting patterns for this industry would also have an impact on stated traffic and transport impacts. Paragraph 15.7.8 sets out that a 'simple gravity model' will be developed for the workforce origins. SCC disagrees with this approach. As above, the Council is of the opinion that there is significant risk in this approach given the number of large infrastructure projects in the area and therefore the availability of a local workforce due to construction periods coinciding. It is considered that substantial consideration needs to be given to the availability of a workforce, the origin of the workforce and therefore its traffic impact.
- 16.3. As stated above, as a result of the demands on the local workforce from Nationally Significant Infrastructure Projects, it would not be unreasonable to assume that the workforce may come from a wider labour market area than usual. Therefore, SCC disagrees that tourism accommodation impacts is to be scoped out due to local workforce (Table 16-8).
- 16.4. SCC is pleased to see that consultations will occur with local business groups in relation to job creation and supply chain opportunities (16.2.5), hopefully demonstrating a commitment to maximising the use of local supply chain, in line with the SCC Energy and Climate Adaptive Infrastructure Policy.
- 16.5. We welcome that employment and supply chain effects have been scoped in and elements identified as potentially significant, such as construction employment (Table 16-8). It is also noted that Table 16-8 sets out that the majority of the workforce will be sourced locally, which will need to be evidenced. Any assumptions around workforce origins within the socio-economic assessment should reflect the impact of construction occurring alongside a large number of Nationally Significant Infrastructure Projects as well as consideration in the assessment of transport impacts.
- 16.6. Due to the large number of concurrent Nationally Significant Infrastructure Projects in the region, it is vital that the workforce assessment considers the different demands on the different phases of the project and assess these cumulatively with other potential major construction projects which will be occurring simultaneously. The Environmental Statement should consider the impact and opportunities the development may place on the local labour market. It should set out clearly the expected number and nature of employment opportunities during each phase of the development. It should relate this to the availability of labour in the area and identify how any mismatch between supply and demand will be addressed.
- 16.7. As part of future submissions, a workforce profile should be provided outlining:
- Peak workforce numbers
  - Average daily workforce numbers
  - Broad competencies of workforce (i.e. civils, mechanical, electrical etc)
  - Anticipated split of home based and non-home based workforce
- These profiles will need to be set against the construction timeline.

16.8. There is an absence of reference to several key documents and sources of data that will enhance the provided socio-economic assessment. These include the Economic Strategy for Norfolk and Suffolk, the Technical Legacy Report for Norfolk and Suffolk along with the Suffolk County Council's Energy Infrastructure and Climate Adaptive Infrastructure Policy.

16.9. The Councils expect the applicant to:

- Deliver and fund, in collaboration with the Councils and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;
- Work collaboratively with the Councils to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;
- Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people;
- Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally;
- Deliver activities with the aim to increase the size and diversity of the labour market pool;
- Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes;
- Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible;
- Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Suffolk's economics, in particular local opportunity that meets skills legacy for the region;

- Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise and LMI to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects;
- Actively engage with the Regional Skills Coordination Function at Suffolk County Council to enable a strategic approach to workforce development in the region, maximising local benefits, minimising negative impacts and ensuring efficiencies.

## **17. SCC Lead Local Flood Authority**

### **Environmental Impact Assessment Scoping Report Volume 1 Main Text (03-2024)**

- 17.1. 12.3.16 – The proposed sub-station site falls towards and drains into ordinary watercourses that subsequently flow into the Friston main river. This is not identified on the EA ‘catchment data explorer’ but is clearly identified as main river as per the EA ‘Statutory Main River Map’.
- 17.2. 12.3.17 – ‘surface water courses’ – it is unclear if this is referring to surface water flow paths or ordinary watercourses? There is a well-defined network of ordinary watercourses that have interaction with the site location, and further downstream the EA main river.

#### **Table 12-7 Proposed scope of assessment**

- 17.3. Both the construction and operational sections of the scope differentiate between ‘larger’ and ‘minor’ watercourses. The LLFA does not distinguish and notes there is a potential for watercourse interconnection and thus there should not be a separation between them.
- 17.4. Main river should be scoped in for the operational phase, discharge from the substation site will flow into the EA main river that flows through Friston. The LLFA acknowledges that detailed protection from pollution will be established at detailed design stages of the project.
- 17.5. ‘Flood risk from the proposed Onshore Scheme to surrounding area’ The constructed permanent scheme will alter the flood risk of the surface water flows in the catchment to the surrounding area and should be scoped in.
- 17.6. The LLFA would encourage cross-examination with the prior SPR EIA-process and inclusion of the Friston Surface Water Management plan to enhance understanding of the catchment area.

## 18. SCC Highways

18.1. The LHA is unsure why a landfall at Landfall F would reduce impacts on the A1095 as this is the only suitable road to access Southwold from the A12.

18.2. Similarly, whilst Landfall G2 avoids part of Walberswick it still passes through a significant part of the village so the reduction of the impact of the construction traffic is minimal.

18.3. The converter station site 3 currently has very poor connectivity to the existing highway network particularly for large vehicles.

### 18.4. 4. Legislation and Policy Overview

Appendix 4-C Local Policy does not acknowledge Suffolk's Local Transport Plan

### 18.5. 6. Air Quality

Appendix 6-A containing Local Authority monitoring results (for air quality) does not include any from the Air Quality Management Area on A12 at Stratford St Andrew.

### 18.6. 12. Hydrology Hydrogeology and Drainage

From a transport aspect SCC note that the main river flooding is potentially scoped in during the construction phase but not the operational phase. In terms of resilience of the highway network to river and coastal flooding SCC makes the following comments:

- Figure 12-3 Flood Risk shows that the A1095 between Blythburgh and Southwold is within flood zone 3. It is also at risk if the river defences to the south are breached. Table 12-5-A. Table 12-A-7 identifies Reydon Bridge being at risk of flooding.
- The A1095 is the only route suitable for large vehicles and the only route for all vehicles into Southwold and passes over Buss Creek which is at risk of inundation during tidal surges. To the north the B1127 at Potters Bridge is regularly closed due to flooding.
- The A12 at Blythburgh falls within flood zone 3. This section has undergone protection works to reduce the risk of flooding in recent years although is still vulnerable to changes in sea level and tidal surges.
- The A12 at Benacre (Laytmere Dam) is at highest risk of coastal flooding unless coast defences strengthened. The sea defences protecting this area and the pump station discharging the Hundred River are considered to be a high risk of failure in the near future.

18.7. Those on the A12 impact on access routes to these projects, particularly large loads if routed from Lowestoft (ie HR100) to the substations.

### 18.8. 15. Traffic and Transport

- 18.9. SCC considers that due to their local importance Public Rights of Way should be assessed as a separate item rather than across several topics. This will enable the full impacts to be considered without constant reference to scattered information.
- 18.10. As part of any submission, a Transport Assessment and a separate Environmental Assessment of road traffic should be submitted. We consider that early consultation with the Local Highway Authority to determine the scope of such an assessment will be of benefit to the Applicant.
- 18.11. Study area should include the A12 between the A14 Seven Hills Interchange and Lowestoft together with any other roads such as the A1120, A144 and A145 which are to provide access to and from the construction area. This is the same as for the SZC scheme but less than that for the SPR projects. SCC consider this wider scope appropriate due to the juxtaposition in time of construction of many NSIPs in the geographical area which will place significant stress on the highway network.
- 18.12. Notwithstanding the above, without details of the likely haul roads and access locations SCC cannot state whether the list of road links or junctions is sufficient to encompass the likely impacts of the scheme. SCC notes that the applicant has provided a list of road links and junctions (15.3) that they consider need to be included in the assessment scope. SCC is not in the position to comment in detail on these without a understanding the volume and routing of construction traffic, location of access and onshore construction program.
- 18.13. The walking and cycling routes do not acknowledge the presence of quite lanes that while having no legal protection do form an important part of the non-motorised network in the area.
- 18.14. The comments made in section 15 appear to suggest that the local highway network does not have any constraints that may affect use by construction traffic. As LHA SCC considers that these comments significantly overestimate the suitability of the evolved rural highway network to carry construction traffic, even elevated numbers of light vehicles.
- The statement in 15.3.9 that Grove Road is a narrow two-way road is incorrect as it is mostly narrow allowing use by single vehicles and has limited passing areas for two-way traffic to pass. For this reason, it was excluded as a construction route in SPR EA1(N) and EA2.
  - Whilst the B1121 through Sternfield and Friston is generally two-lane width there are a number of pinch points including a priority system at the bridge over the River Fromus together with sharp bends and an acute junction with the A1094 south of Friston. During previous applications it was considered a route unsuited to construction traffic. Whilst sections of the B1121 are derestricted

there are a number of speed limits at Benhall, Saxmundham, Kelsale, Sternfield and Friston where the road passes through settlements rather than 'generally derestricted' (15.3.16).

- The Friston substation has limited highway access and for that reason SPR proposed a haul road from the B1069 south of Knodishall to gain access. The convertor station to the east of Saxmundham is similarly constrained with current access only via the B1121/B1119 crossroads in Saxmundham or from the east via Leiston. There are a number of sharp bends and some pinch points along the B1119 between Saxmundham and Leiston.
- The A12 between Blythburgh and the B1121 at Saxmundham has a number of 40mph and 50mph limits generally introduced to improve road safety in rural areas (eg Darsham, south of Yoxford, south of Blythburgh).
- The C225 The Street and C226 Westleton Road between the A12 at Yoxford and Westleton via Darsham are generally wide enough for two cars to pass but not a car to pass an HGV or agricultural vehicle albeit with some narrow sections. The roads are winding and edge over-run common. The same is true of Wangford Road between the A12 at Wangford and Uggheshall and the Wenhaston Lane between the A12 at Blythburgh and Uggheshall / Wenhaston
- Speed limits do apply to sections of the A145 contrary to 15.3.42, for example Brampton, Shadingfield and Willingham St Mary, as do limits on the B1123 for a considerable length through Blyford, Holton and Beccles. A low bridge in Halesworth further constrains high sided vehicles.
- The B1127 at Potters Bridge is subject to frequent inundation.
- Lodge Road between the B1387 in Walberswick and the B1125 at Blythburgh is a unclassified road even though sections are unmetalled. It is narrow throughout with limited passing places. The junction with the B1387 is acute, with poor visibility and difficult to navigate even in a light vehicle. A 30mph limit is in place within the built up area of Walberswick.
- North of Southwold Easton Lane and the Warren are single lane unmade private roads.
- The Street in Walberswick is rarely wide enough for two way traffic and has significant areas of on street parking. Being a tourist attraction, the area has significant numbers of pedestrians and cyclist who use the road due to the absence of footways or cycleway.
- Classified roads particularly C and some B class roads are not suitable for the routing of construction traffic as assumed in 15.5.6.

18.15. Due to the uncertainty regarding the timing of delivery of consented (SZC, SPR EA1(N) and EA2) and future NSIPs (Sealink, Nuatilus) SCC considers that a realistic worst-case scenario of the combined construction traffic should be considered. Although construction activities are temporary the combination

of scheme is likely to last for a number of years and it is not inconceivable that the peaks for individual projects may coincide. The selection of a mid-year (ie 2028) may hide peaks such as construction / removal of haul roads which typically create significant peaks in HGV traffic and may also avoid the cumulative impact of SZC which although forecast for 2028 may occur later. If the Applicant proposes set shift patterns to avoid the existing network peaks this may also require testing as other projects are using the same approach which may result in the network peaks becoming the beginning and end of these set shifts patterns.

- 18.16. In addition to the construction traffic impacts stated in 15.4.2 SCC would consider inclusion of increased likelihood and severity of collisions, displacement of local traffic from arterial routes to minor roads ('rat-running'), loss of amenity, fear and anxiety and severance particularly for PRow and where local roads are used by walkers, cyclists and horse rides both for access within communities and as links between PRow.
- 18.17. Specifically in the area of the substation and convertor station an additional impact will be the cumulative impact of repeated impacts from multiple projects repeatedly closing or restricting the highway and PRow network over a number of years.
- 18.18. A framework CTMP should be included within the application rather than prior to construction together with a suitable planning mechanism to approve the final CTMP prior to construction.
- 18.19. The control measures do not include any reference to a Travel Plan or controls on construction traffic generated by workers. Whilst acknowledging that the limited public transport options make this challenging SCC would expect the applicant to identify practical measures to reduce worker trips by car and promote sustainable travel wherever possible, for example using mini-bus pick up or crew buses instead of private cars.
- 18.20. Control measures and management plans must include pre-commencement works within their scope as experience has shown these can have significant adverse local impacts if not.
- 18.21. When considering the sensitivity in terms of receptors (15.7) wherever possible this shall be based on appropriate data rather than the use of professional judgement that is open to challenge.
- 18.22. When applying rule 1 and 2 from the IEMA guidelines SCC would consider that these thresholds are not considered absolute as inherent uncertainty in data collection create a degree of error in the calculated values (for example increases of 28%, or 29% should not automatically dismissed).
- 18.23. The Transport Assessment should also consider:
  - Suitability of access from the highway, specially impacts such as vegetation removal to provide safe visibility. This will require surveys and site visits to provide sufficient detail to identify the consequential impacts.

- Identification of feasible AIL routes to identify constraints such as weak bridges or road geometry.
- 18.24. Further information would be required in terms of Driver delay whether this is based on the shortest route or signed diversion. Also, clarity is required on whether PRoW Severance is measured in terms of individual closures or cumulative length of closure where multiple routes are closed.
- 18.25. Abnormal indivisible loads (AILs) should not be scoped out from the assessment of construction traffic impacts (as proposed in Table 15-2). Whilst these AILs may be planned for non-peak periods, the local road network includes many roads of restricted widths, with limited or no footways, and roadside heritage assets, and during non-peak periods there is significant use by visitors, by local residents, and by non-motorised users.
- 18.26. As noted in 2.3.3 the Friston substation will potentially host five energy projects in addition to up to five convertor stations. From a transport perspective SCC would consider that the cumulative impact of these projects is likely to create an impact in terms of AIL and HGV accessibility during the Operational Phase and that this should be scoped into the assessment. Whilst individual schemes are looking at providing temporary solutions during the construction phase these are not co-ordinated nor resilient.
- 18.27. The document contains limited information regarding the nature of the construction including temporary works such as haul roads. See comments on materials for estimated material use and HGV trips.
- 18.28. 16.Socio-Economics, Recreation and Tourism
- 18.29. SCC notes in the Economic Section that reference (16.3.15) is made to the lower-than-average proportion of working age population in East Suffolk. This combined with the high demand for construction workers for other major projects and pressure on temporary housing and accommodation is likely to mean workers will travel greater distances than usual. The scoping of the assessment should take this into account, in transport terms by widening the geographical area included within the assessment.
- 18.30. 17.Minerals Assets and Waste
- 18.31. Whilst noting there are no active landfills identified in the study area the Applicant should consider the likelihood of historic landfills which due to their age were not recorded nor subject to control.
- 18.32. The documents contain little data on the volume of materials required but based on the information that is provided SCC has made the following estimates of material required and HGV movements generated.
- 18.33. Materials required for HVAC cables (Saxmundham to Friston @2.5km)
- Backfill for each trench 2.45m x 1.5m (less 0.3m topsoil) = 2.94m<sup>2</sup> / lin m



- Single scheme only: 2 trenches = 15,00 tonnes = 750 HGV deliveries (1500 two-way movements)
- Two projects: 6 trenches = 30,000 tonnes = 1500 HGV deliveries (3000 two way movements)

#### 18.34. Materials required for HVDC cables (Southwold / Walberswick to Saxmundham @24km)

- Backfill for each trench 3.0m x 1.5m less 0.3m topsoil = 3.6m<sup>2</sup> / lin m
- Single scheme: 1 trench = 180,000 tonnes = 9000 HGV movements (18000 two-way trips)
- Two Projects: 2 trenches = 360,000 tonnes =18000 HGV movements (36000 two-way trips)

#### 18.35. Haul Road (estimated length 27km)

- Based on SPR and other underground cable projects haul road 6m width, 0.5m thickness = 3m<sup>2</sup> per linear m.
- Estimated corridor length @27km = 81,000m<sup>2</sup> sub base @170,000 tonnes, so assuming 20 tonne tare HGVs = 8500 HGV deliveries (17,000 movements)
- Excludes construction of substation, convertor station and temporary site compounds. The values above are nly for construction and in the case of the haul road do not include removal post construction.

#### 18.36. Fig 16-2 does not show Saxmundham Garden Neighbourhood

## 19. SCC Landscape and Visual

### Landfall and cable route

- 19.1. SCC considers that the evidence shared by the Applicant to date does not conclusively demonstrate that landfall at Aldeburgh/Thorpeness would overall cause greater environmental harm than the proposed and preferred landfall options north of Southwold or in Walberswick.
- 19.2. Landfall at Aldeburgh/Thorpeness is the only possible landfall option to co-locate not only the landfall, but also the cable corridor with Sea Link.
- 19.3. The emerging preferred options do not allow for the coordination and co-location with other projects and would require a separate single-project cable corridor of approximately 15 miles, which would be expected to have significant adverse landscape and visual effects to an extent that is likely to be considered unacceptable.

- 19.4. SCC cannot support the Applicant's proposed and preferred options, without further evidence, which clearly and transparently demonstrates, through comparative assessment, that the likely environmental harm resulting from the preferred landfall options north of Southwold or at Walberswick to terrestrial ecology, archaeology, landscape character, landscape features and the fabric of the highly sensitive landscape, is outweighed by the likely additional harm to marine ecology, biology and archaeology, if choosing a co-located Landfall at Aldeburgh/Thorpeness (instead of north of Southwold or at Walberswick).
- 19.5. Therefore, SCC considers that the Landfall at Aldeburgh/Thorpeness should be scoped back in for the purposes of the Section 42, Preliminary Environmental Information Report.

### **Proposed converter station location east of Saxmundham**

- 19.6. As this location offers the possibility for co-location and co-ordination with other energy projects, such as Sea Link, SCC supports this location in principle, subject to design co-ordination of the projects and the provision of an overall landscape strategy and masterplan.

### **Implications of Levelling Up and Regeneration Act (LURA), 2023**

- 19.7. SCC considers that the Applicant needs to demonstrate in the Environmental Statement how it fulfils the new duty under LURA, 2023, and that this needs to be scoped in, as the proposed scheme boundaries include parts of the Suffolk and Essex Coast and Heaths National Landscape (Area of Outstanding Natural Beauty) and its setting.
- 19.8. Paragraph 4.3.15 of the Scoping report requires amendment, as it does not reflect the changes to legislation that were introduced with the Levelling Up and Regeneration Act (LURA, 2023) (Section 245 Protected Landscapes, (5)), which came into effect on 26 December 2023. This amends the Countryside and Rights of Way Act 2000:

*'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'*

- 19.9. The definition of 'relevant authority' includes any statutory undertaker, and therefore National Grid.

### **Relationship with other parts of the EIA**

- 19.10. The Scoping Report does not explicitly recognise the relationships between landscape and visual matters and other parts of the EIA, specifically, ecology, historic environment, socio-economics and tourism, and traffic transport and rights of way. The Council considers that to ensure a comprehensive assessment of landscape and visual effects the relationships between this chapter and other matters in the EIA should be clearly recognised. It is notable that such relationships are explicitly recognised in the scoping for the East

Anglia GREEN project, also promoted by National Grid Electricity Transmission (NGET).

19.11. SCC notes that Table 29-1 Potential for intra projects effects onshore, appears to be, in effect, an attempt to show the relationship between topic areas. This is welcome. However, SCC considers that Landscape and Visual matters are linked to more other topic areas than indicated in the table and would ask the Applicant to consider in addition the inter-relationships of L&V with AQ, EC, GC, H7W, H&D, N&V, T&T, S-E and MA&D. The relationships between the topic areas will need to be described in the chapters of the ES.

### Data sources and baseline

19.12. The relevant data sources proposed appear to be appropriate and largely comprehensive. However, the Council would also recommend reference to the Designation History Series as it relates to the Suffolk Coast and Heaths AONB<sup>2</sup>. This has informed consideration of other large scale energy infrastructure projects on the Suffolk coast.

19.13. In addition, the applicant should be aware of the cultural importance and sensitivity of the Suffolk coast. A detailed overview of these issues is provided in the introductory material of the Suffolk, South Norfolk, and North Essex Seascape Character Assessment<sup>3</sup> and reference should be made to this.

19.14. Table 13-1 Scoping baseline data sources should further include Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Partnership Position Statement (Endorsed December 2015): Development in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) ENDORSED-SCH-AONB-Position-Statement-on-Development-in-Setting-of-AONB-2015.pdf (coastandheaths-nl.org.uk).

### Impacts on the fabric of the landscape

19.15. Trees, including irreplaceable habitats: ancient, veteran and notable trees

19.16. Paras. 8.3.23-8.3.24 of the Scoping Report state:

*A total of 99 ancient, veteran or notable trees have been identified within the study area (1km), from information provided by SBIS and the Ancient Tree*

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<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010078/EN010078-004113-SCC%20The%20Designation%20History%20of%20the%20Suffolk%20Coast%20and%20Heaths%20AONB%20220221.pdf>

<sup>3</sup> [https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1\\_5997\\_Assessment\\_V1\\_10\\_Issue\\_web.pdf](https://suffolklandscape.org.uk/wp-content/uploads/2020/08/Part1_5997_Assessment_V1_10_Issue_web.pdf)

*Inventory. Those that fall within the Onshore Scoping Boundary (23 trees) and those within 50m (3 trees) are listed in Table 8-7, which are ordered within the table according to distance from the study area. All distances should be considered approximate. 8.3.24 There is also potential for unmapped ancient, veteran and/or notable trees to be present within the study area, particularly given the known prevalence of these trees associated with hedgerows throughout Suffolk. Notably, Suffolk is known to constitute a significant stronghold of the remaining native black poplar (*Populus nigra* spp. *betulifolia*) population in the UK, with a high number of the local population closely associated with Saxmundham to the immediate west of the Onshore Scoping Boundary. Phase 2 surveys may be required to confirm identification of unmapped ancient and veteran trees.*

19.17. An Arboriculture Strategy will be required, for review by the relevant local authority.

19.18. SCC considers that the cable corridor should avoid all ancient woodlands and expects that **all** trees – not just ancient, veteran and notable trees - within the scheme boundary will be appropriately identified and mapped, and that impacts on **all** trees, but particularly impacts on ancient, veteran and notable trees are avoided, as far as possible, and compensated where this is not possible.

19.19. Irreplaceable Habitats: AWI sites

19.20. Paras. 8.3.21-8.3.22 states:

*Ten AWI sites have been identified within the study area (1km). These sites are summarised in Table 8-6 which are ordered within the table according to distance from the study area. All distances should be considered approximate. 8.3.22 Woodlands may qualify as ancient without being mapped on the AWI23, often due to their restricted size (only woodlands over 2ha were originally included within the AWI). A desk-based review for potential unmapped ancient woodland will be undertaken by Historic Environment using historic maps to assess the likelihood that ancient woodland occurs, i.e., areas of land having been continuously wooded since 1600AD, to be included within the PEI Report. This exercise will also be informed by ecological review of Local Wildlife Site (LWS) citations which may identify potential ancient woodland.*

19.21. The Applicant may be aware that SBIS continues to work on the Ancient Woodland Inventory update which commenced in November 2021 for Suffolk. The project is now in Phase 3 of 4, with the main focus on checking potential new ancient woodland or pasture and parkland sites on historic maps dating back as far as 1600(SBIS Newsletter, Spring 2024, [SBIS Newsletter Spring](#)

[2023 \(suffolkbis.org.uk\)](http://2023.suffolkbis.org.uk). SBIS may be able to provide much of the data required by the Applicant.

#### 19.22. Hedgerows

In paragraph 8.3.28 one bullet point refers to hedgerows:

*Hedgerows – it is assumed that the majority of hedgerows present within the study area meet the criteria for the corresponding priority habitat type, with a composition of at least 80% native species . A county-wide survey identified that over half the landscape hedgerows in the county are species-rich. Hedgerows are distributed widely and frequently throughout the study area. Hedgerows will be captured during the PEA surveys. These surveys will confirm whether hedgerows comprise priority habitat and identify those that are species-rich and those that have potential to support protected/ notable fauna. Additional assessments to identify Important hedgerows will only be undertaken if permanent hedgerow loss cannot be avoided within the proposed Landfall Sites, proposed Converter Station or proposed Friston Substation.*

19.23. SCC considers that this is wholly unacceptable.

19.24. Based on the experience of similar projects elsewhere in Suffolk, a comprehensive approach to important hedgerows under the Hedgerow Regulations 1997 will be required. This should identify all hedgerows within the scheme boundary that are important under the various historic and designation related criteria, in addition to the ecological matters under the regulations as set out in Section 3 and Schedule 1 of the Regulations.

19.25. In order for the DCO to deal effectively with the Hedgerow Regulations 1997 it will be necessary to identify Important Hedgerows within the order limits in a schedule of the DCO, and on works plans.

19.26. Furthermore, **all** hedgerows along the route to be removed to facilitate construction should be surveyed in detail in advance to inform specific and appropriate planting schemes for their restoration, as well as mitigation for the adverse ecological impacts caused by their temporary loss as mature features in the landscape.

19.27. Additional impacts on trees and hedgerows are also anticipated due to the creation of construction access points, haul routes, laydown areas and archaeological investigations, so these areas will also need to be fully considered, assessed and accounted for.

## **LVIA Methodology**

19.28. SCC considers that the methodology for the assessment of landscape and visual matters to be broadly acceptable, provided the following points can be satisfactorily addressed.

- a) Chapter 13 of the ES cannot be called Landscape and Visual Amenity, as this does not reflect all aspects that will need to be considered. The chapter should either be called Landscape and Visual Assessment (LVIA), if that is what it is, or Landscape and Visual Matters, if the chapter goes beyond the LVIA to include design and control measures (such as an Outline Landscape and Ecology Management Plan (OLEMP) and proposals for monitoring and aftercare).
- b) With regards to the proposals by the Applicant to supplement the existing published landscape character assessments with a finer level of detail by defining Local Landscape Character Areas (LLCAs) SCC considers that these LLCAs should sit logically within the wider published LCTs and LCAs and that this should also be reflected in the presentation (for example with regards to colour coding). SCC considers that the Suffolk Coastal Landscape Character Assessment and the Waveney District Landscape Character Assessment already provide a good level of detail and that there may be a risk of over-fragmentation.
- c) SCC considers Table 13-4 Establishing landscape value criteria not to be useful in its current layout. The column for 'Stage 2 – Define landscape value' seems to have been inserted without any relation to the other columns.
- d) Valued landscapes: The Applicant focuses (rightly) on designated landscapes and the means to justify valued landscapes outside designated areas. The Applicant points out that the bar is set high for a landscape to be considered valued in the context of the NPPF (para. 13.7.17). What seems to get overlooked, are parts of paragraph 180 of the NPPF (December 2023) which call for the recognition of the intrinsic character and beauty of the countryside and its wider benefits from natural capital and ecosystem services (which includes trees and woodland) (part b), and also for the maintenance of the undeveloped coast (part c). For the purposes of the LVIA and any mitigation proposals it will be important to avoid a black and white approach, where any stretches of landscape that are neither designated nor fulfil the criteria for a 'valued landscape', are regarded as irrelevant.
- e) Paragraph 13.7.20 refers to Table 13-5; should this be Table 13-4?
- f) Table 13-6 Sensitivity of landscape receptors criteria: This table is not a true merger of the tables for value Table (13-4) and sensitivity (Table 13-5), as it does not, for example considers what would happen if a landscape for medium value, was found to have a very high susceptibility to the scheme. This would result in a high sensitivity. It cannot automatically be assumed that landscape areas of lesser value have a correlating lesser

susceptibility to the scheme; if this was the case the distinction between value and susceptibility would be unnecessary or only serve the one-sided purpose to enable schemes in designated and valued landscapes with the argument that their susceptibility is not always as high as their value might suggest.

- g) Visual assessment: GLVIA 3, states in para. 6.36 *that '[...] it will be important to recognise that residents may be particularly susceptible to changes in their visual amenity [...]*'. SCC considers that this speaks for classifying residents into the highest category in *Table 13-9 'Susceptibility of visual receptors to change'*, i.e. 'Very High'.
- h) With regards to *Table 13-8 'Value attached to views criteria'*, SCC considers that the bar is set too high for views of high, medium and low values, by demanding that their indicators of value should be identified in development plans or evidence base. It may often be the case that views which do have indicators of value, few detracting features and/or cultural associations may not have been identified in development plans or an evidence base. Absence of proof is, however, not proof of absence, and SCC considers that it is the task of the LVIA carried out by the Applicant to establish the value of views as part of their assessment. SCC considers that the references to development plans and evidence bases should be deleted from table 13-8 and 13-10.
- i) SCC accepts the definition of significance of effects in EIA terms, that only moderate and major effects are to be considered significant. However, SCC considers that a reasoned professional judgement should be made particularly for those visual effects that may fall either into the 'moderate' or 'minor' bracket in the matrix.
- j) SCC further considers that an accumulation of non-significant effects, can become significant, and that this must also be considered in the ES.
- k) Paragraph 1.7.56 states: *'Adverse effects are likely to occur where the proposed Onshore Scheme introduces new elements or changes which are discordant or intrusive resulting in a deterioration to existing character or valued features of the landscape or of views and visual amenity'*. SCC considers that this definition is not broad enough. Adverse effects, including long-term, permanent and irreversible adverse effects can also result from existing landscape elements being removed from the landscape to enable a scheme. This is particularly relevant in the cable corridor.

### **Viewpoint Locations**

19.29. It is welcome that the Applicant is committed to agreeing the representative viewpoints with SCC, ESC and the Suffolk and Essex Coast and Heaths National Landscape Partnership (para. 31.7.37).

- 19.30. When selecting viewpoint locations for agreement with the relevant local authorities, the Applicant should consider the following points.
- 19.31. For the purposes of clarity, each proposal option should have its own figure, showing only the viewpoints relevant to this option. By doing this, it is likely to become more evident that, while there may be some overlap, the different options will require individual sets of representative viewpoints. The Council considers that these amendments should be prepared for the purposes of the Section 42, Preliminary Environmental Information Report.
- 19.32. SCC reserves the right to request additional viewpoints, or revised viewpoints, to support the final EIA that will be submitted with the DCO application.
- 19.33. The scoping document appears to only consider representative viewpoints. Given the scale and sensitivity of the project on its own, and in combination with other projects, and given the very high level of public interest, the Council considers it is also necessary to include both specific viewpoints *and* illustrative viewpoints, as discussed in paragraph 6.19 of GLVIA 3. A combination of both wireline and photomontage visualisation may be appropriate. Finally, specific viewpoints may be required to understand impacts on specific heritage assets, which is a matter outside the scope of LVIA.

### **Visual representations – methodology**

- 19.34. The Applicant should provide, as soon as is reasonably practicable, a detailed methodology and rationale for the preparation and presentation of visualisations, be that photomontages, wire frame, or annotated viewpoint photography. The latter may be helpful and important in promoting wider public understanding of the project, and its anticipated effects. Agreement on methodology, with the relevant local authorities, supported with sample pages for each visualisation type, would be expected prior to the preparation of the visualisations.
- 19.35. A further important aspect of the visualisations will be the realistic representation of any proposed mitigation planting, and its effectiveness. Therefore, both the representation of future mitigation planting, and the anticipated growth rates of that planting, should be agreed with the relevant local authorities and other relevant consultees, prior to preparation of any visualisations.

### **Intra-project effects of multiple aspects on receptors**



19.36. The methodology for intra-project effects of multiple aspects on receptors as presented in the Scoping Report does not appear to capture the essence of the issues. While *Table 29-1 Potential for intra projects effects onshore* reflects on how topic areas might be interlinked, it does not examine the cumulative effects that various elements or sections of the scheme could have on certain receptors. To give an example, users of Public Rights of Way may be affected by footpath closures and diversions, by construction noise, vibration and dust as well as by loss of shelter and visual amenity, because of the loss of vegetation; furthermore, all these adverse effects on footpath users would be compounded by the sequential nature of the effects of a linear scheme.

19.37. Given that users of PRow are pivotal receptors, especially when it comes to intra-cumulative and sequential effects, SCC considers that considerations for Public Rights of Way should be presented as stand-alone chapter in the PEIR and the ES.

### **Intra-project effects of the proposed Onshore and Offshore Scheme**

19.38. SCC views the considerations for intra-project effects at the onshore-offshore interface to be broadly acceptable, but reserves the right to ask for the inclusion of additional receptors or project phases, should this seem warranted at a later stage.

### **Inter project effects assessment**

19.39. SCC considers that a number of the current suggestions for maximum Zones of Influence (Zoi) are not acceptable, and that the individual Zoi should be agreed with the relevant local authorities, once sufficient information becomes available.

19.40. Cumulative effects with other projects, such as, but not limited to, Sizewell C, will need to be fully considered. In particular the cumulative and combined effects on landscape and visual receptors, ecology and public rights of ways will need to be assessed, so that a strategy can be developed to reduce and mitigate these effects through engagement and co-ordination with the identified other projects.

19.41. SCC does not agree with para. 29.3.21 of the Scoping Report '*that any development with a consent older than five years will have been built out or lapsed after the three year consent for commencement has passed. Therefore, it is proposed that any development with a consent older than five years will be excluded from the long list.*'

19.42. For DCO consents the time frame for commencement from consent is usually five years rather than three (which usually applies to TCPA permissions). More importantly however, there may be projects in the area that require construction periods beyond five years post consent, and which may result in cumulative effects. As an example, EA3 Offshore Wind Farm was consented in August 2017 and is still being constructed.

### **Cumulative impacts at the Saxmundham Converter Station and Friston Substation sites**

19.43. Whilst acknowledging the current attempts by National Grid Ventures to seek a connection point for the Nautilus project at the Isle of Grain<sup>4</sup>, the Council considers that it is still a reasonably likely worst-case scenario that three DC interconnectors will link to the transmission network at Friston via the converter station at Saxmundham. Therefore, it will be essential for all parties involved to collaborate in the effective redesign of the Friston masterplan<sup>5</sup>, that supported the application proposals for East Anglia 1 North and East Anglia 2, as well as on a masterplan for the Saxmundham site.

19.44. It is anticipated this collaboration will have an impact on the discharge of detailed design requirements for the two wind farm projects in that location, including engagement with communities on detailed design matters, as specified in those consents.

19.45. SCC recognises that East Suffolk Council generally takes the lead on these matters as discharging authority.

### **Design measures**

19.46. SCC considers that the Mitigation Hierarchy must be applied to its full extent and that this needs to be anchored into the design principles. Embedded design measures should include avoidance and minimisation of vegetation losses (for the purposes of landscape, this means in particular losses of trees and hedgerows), before considering mitigation and compensation measures.

19.47. SCC considers that the most effective design measure to avoid and minimise harm to the landscape within the onshore element of the scheme rests on co-location and coordination with other projects and on avoiding a potentially 15 mile long single-project onshore cable corridor, of which

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<sup>4</sup> <https://www.nationalgrid.com/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus-interconnector>

<sup>5</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-005116-ExA.AS-6.D11.V3%20EA2%20Substations%20Design%20Principles%20Statement.pdf>

approximately half leads through the Suffolk and Essex Coast and Heaths National Landscape or its setting.

19.48. SCC considers that within the cable corridor it will be impossible to fully mitigate the permanent changes to the landscape because of the permanent loss of trees. The resulting residual effects would require compensation in form of comprehensive landscape restoration outside the cable corridor.

19.49. SCC notes that the bullet point in para. 13.5.4 with regards to working width around ancient woodlands and ancient and veteran trees does firstly not fully align with the statements made in *Chapter 8 Ecology and Biodiversity*, para. 8.5.3, and secondly a set-back from ancient and veteran trees of 15 times the diameter of ancient or veteran canopies, would be welcome, but may not be achievable.

#### 19.50. Biodiversity Net Gain (BNG)

While mentioning that the Ecology and Biodiversity Chapter of the PEI Report and ES will be supported by a BNG assessment (using the Statutory Biodiversity Metric in accordance with the accompanying guidance and best practice principles), the Applicant does not appear to commit to achieving measurable Biodiversity Net Gain. Although not yet required by law, SCC considers that it would be best practice to aim for a biodiversity net gain of no less than 10%.

#### 19.51. The importance of Good Design

While SCC acknowledges that the various elements of the different schemes would require their own consent and would need to function as their own entity (see Scoping report, 2.3.25), the Council considers there is the opportunity to achieve a coherent architectural and landscape design approach between all projects at a consolidated converter station site. Furthermore, this approach could be used to support the necessary modifications to the design and layout of the Friston site.

19.52. SCC notes that section 4.7 of Overarching National Policy Statement for Energy, EN-1, (November 2023, in force since 17 January 2024) suggests in 4.7.8 that the Applicant should consider taking independent professional advice on the design aspects of schemes. It further states that:  
*'In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.'*

- 19.53. Furthermore, the SCC notes that the National Infrastructure Commission, Design Group, states in their Design Principles for National Infrastructure (November 2020) that: *“All infrastructure projects to have a board level Design Champion in place by the end of 2021 at either the project, programme or organisational level, supported ... by design panels”*
- 19.54. The Applicant lists this publication as relevant guidance (Scoping Report, para. 13.7.4) but does refer to a Design Champion or even Design Principles, except in a bullet point under 13.5.4, with regards to embedded design measures. These are not overarching design principles.
- 19.55. SCC would support the principle of a Design Champion being engaged sufficiently early in the development of the project, and the other projects that are anticipated to use any coordinated site, to oversee the design process. In practice, because this work will need to straddle both architectural and landscape disciplines, two key leads may be required to work in close collaboration.
- 19.56. A Design Champion would have the potential to contribute to the consideration of sustainable design issues and to the integration of the proposals into the landscape at the detailed design, construction, and operational stages of the project.
- 19.57. SCC would also support the use of a design review panel, a design code/design approach document, and an outline of the design process, setting out key stakeholders, consultees, and the community engagement processes.
- 19.58. The skillset required of a Design Champion has not been clearly defined within the National Infrastructure Strategy. The Institution of Civil Engineers (ICE) and the National Infrastructure Commission Design Group (NICDG) have produced a useful working paper [‘Defining and developing the design champion role’](#), (August 2022), in this respect.
- 19.59. It is unclear, why the Applicant has not begun to embrace Electricity Networks Commissioner’s recommendations for accelerating electricity transmission network deployment, such as the creation of Electricity Transmission Design Principles (Scoping Report, para. 4.5.40). SCC notes the National Grid Group’s response to the Electricity Network Commissioner’s report: *‘We welcome the report’s recommendations and the focus on delivering tangible benefits for communities hosting new infrastructure. [...] There is no time to waste, implementing the proposals and progressing the energy transition at pace is the surest route to more affordable bills, greater energy resilience and a more energy independent UK.’* ([The UK Electricity Networks](#)

[Commissioner's report, and how we should think, plan and deliver transmission projects differently | National Grid ET](#)

19.60. National Grid's own Design guidelines for development near high voltage overhead lines ( [ASoP A4 AW\(27.05.03\) \(nationalgrid.com\)](#) ) may also provide useful pointers, although being focused on overhead lines.

### **Control measures**

19.61. SCC considers that the measures to protect sensitive landscape features should also include HDD, micro-siting and reduced working widths.

19.62. SCC welcomes the Applicant's commitment to provide an Arboricultural Impact Assessment including a Tree Constraints Plan and a Tree Protection Plan, produced in accordance with the British Standard 5837:2012 'Trees in Relation to Design, Demolition and Construction', which would set out protective measures such as fencing and construction exclusion zones within tree root protections areas. SCC considers that heras- type fencing will be required as a standard, unless otherwise agreed with the relevant local authority in exceptional locations.

19.63. SCC welcomes the Applicant's commitment to provide an Outline Landscape and Ecology Management Plan (OLEMP). It is not clear from the Scoping document, if the Applicant refers to Suffolk's Local Nature Recovery Strategy (LNRS), but SCC would welcome if the OLEMP was rooted in the principles and proposals for the Suffolk LNRS.

19.64. SCC welcomes the Applicant's commitment to provide an Environmental Masterplan, on the assumption that the contents will be agreed with the relevant planning authority.

### **Additional comments on landfall options, cable routes and the proposed converter station at Saxmundham**

#### **Landfall and cable route**

#### Emerging preferred Landfall Location Options with limited potential for coordination with other projects

19.65. The landfall locations north of Southwold (Option F) or Walberswick (options G and G2) cannot not be supported in landscape terms, as they are not only located within a highly sensitive landscape, but also at a great distance from a potential substation to connect to the National Grid, such as the substation proposed at Friston and potential Converter Station at Saxmundham.

- 19.66. The emerging preferred option for landfall location north of Southwold would result in the longest cable route of all options examined thus far, although the Scoping Report does not provide a length.
- 19.67. The cable corridor from either landfall location option south of Walberswick would be likely to traverse the Minsmere-Walberswick Ramsar site and SPA, the Minsmere-Walberswick Heaths and Marshes SSSI, and the Minsmere to Walberswick Heaths & Marshes SAC.
- 19.68. The highways access to both sites is unsuitable. While the alternative site in Walberswick would avoid passing a number of Listed Buildings along The Street (B1387), and crossing the Dunwich River, it would potentially still need to pass the Grade I Listed St Andrew's Church. The existing access via Stocks Lane is considered unsuitable for construction traffic.
- 19.69. Approximately half of proposed Onshore Scheme Scoping Boundary is located within the Suffolk and Essex Coast and Heaths National Landscape (AONB) or its setting. While there are fewer designations along this route corridor, it is in highly sensitive and largely intact rural landscapes such as the Hundred River, the Minsmere River, the Wang River and the Blyth River valleys.
- 19.70. The Scoping Report states in paragraph 1.6.6 -1.6.7:
- 'The proposed Onshore Scheme Scoping Boundary includes parts of the Heath Area of Outstanding Natural Beauty (AONB), Minsmere-Walberswick RAMSAR, Minsmere-Walberswick Heaths and Marshes Sites of Special Scientific Interest (SSSI), Minsmere to Walberswick Heaths & Marshes Special Areas of Conservation (SAC), Minsmere-Walberswick Special Protection Areas (SPA) and four areas of Ancient Woodland. The following main rivers cross the proposed Onshore Scheme Scoping Boundary: The Hundred River, River Minsmere, River Blyth and River Wang.'*
- 19.71. Throughout this corridor the landscape is characterised by intact historic field boundaries (see OS Six Inch map, 1888-1913). Many of these field boundaries are lined with hedges and mature trees. There is a likelihood that a significant number would be veteran trees, which are considered irreplaceable. Even with careful micro-siting it is considered that the environmental impacts would result in severe adverse residual impacts not only on landscape, but also biodiversity and cultural heritage, all of which would be compounded by the length of the corridor.

Landfall Location Option with potential for coordination with other projects: Landfall Location between Thorpeness & Aldeburgh (Option E)

- 19.72. As is the case with the two emerging preferred landfall options, this potential landfall location is also highly constrained. It is located within the Heritage Coast and the Suffolk and Essex Coast & Heaths National Landscape (Area of Outstanding Natural Beauty). It is close to the Sandlings Special Protection Area and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The area also has high archaeological potential. In terms of tourism, it is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh. The construction of the cable route would likely affect the Sandlings Walk in several places, as well as other, connected, footpaths.
- 19.73. However, this is the only landfall option that would allow co-location and co-ordination of landfall and required cable corridor with other projects, namely Sea Link.
- 19.74. SCC considers that the reasons given in the Scoping Report, why the is landfall option was ruled out, need to be further explored and evidenced
- 19.75. SCC therefore considers that this landfall option should not be scoped out at this stage but should be scoped back in and fully assessed.

**Proposed Converter Station location east of Saxmundham**

- 19.76. The Scoping report references at 2.3.24 that there is a potential opportunity to co-ordinate the proposed Onshore Scheme with Sea Link which is proposing a converter station at the same location, and potentially also with Nautilus. At the potential Converter Station site to the east of Saxmundham (formerly Converter Station Search Area 3) up to three converter stations could be co-located, which is why SCC is supportive, in principle, of this site, subject to design co-ordination of the projects and the provision of an overall landscape strategy and masterplan.
- 19.77. The current landscape at this site is generally open, and a converter station would be prominent from the B1119. The land to the north and East of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area presented a locally characteristic field pattern and included a substantial Ancient Woodland known as [Great Wood](#), as well as ponds and a small plantation typical of the [Ancient Estate Claylands](#) landscape type, of which this

area is part. The loss of landscape features would therefore be minimal and the potential for Green Infrastructure benefits and Biodiversity Net Gain would be greater than on alternative sites.

19.78. There are a number of listed buildings within the vicinity of this site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting. Saxmundham Footpaths 5 and 6 cross the site and would likely require diversion.

## **20. SCC Public Rights of Way**

### **Local Planning Policy**

20.1. Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out SCC's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working."

20.2. SCC will expect enhancements to the network in addition to mitigation, compensation, and management strategies that will ensure that the public, residents and tourists alike, retain the quantity and quality of access provision.

### **Scoping methodology for Public Rights of Way & Green Infrastructure**

20.3. It is disappointing that the applicant has chosen not to holistically consider the potential impact on the PRoW network and its amenity value to its receptors as a separate theme, but has instead split this aspect across a number of other chapters, namely health and wellbeing, landscape and visual amenity, traffic and transport and socio-economic, recreation and tourism.

20.4. As a result, the scope and proposed methodologies fail to recognise the importance of the quality of the experience enjoyed by the public when going for a walk or ride. A walker, cyclist or horse rider using a public right of way or open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.

20.5. EN-1 recognises that when considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness and



convenience of the right of way. These same measures should be used when assessing impact on amenity.

**20.6. How and where in this scoping and impact assessment process is the applicant considering these fundamentally important factors as part of the user experience?**

20.7. This fractured approach potentially gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant.

20.8. Therefore, SCC's position is that public rights of way and amenity should be dealt with in their own chapter of the environmental impact assessment so that the impact on both the physical resource and the amenity value of the public rights of way and access network can be properly understood, including interactions between different parts of the scheme, both temporally and spatially.

20.9. This should include the effect on the physical resource from temporary or permanent closures and diversions, and also on the quality of user experience. Consideration should be given to the assessment methodology used for access and amenity in the Sizewell C Project which included the assessment of: -

- Physical changes to resources (i.e. changes to Public Rights of Way through diversions or temporary and permanent closures, severance, loss of connectivity, changes to journey length).
- Changes to the quality of the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, light pollution, and traffic.
- User stress – effects experienced by receptors due to route uncertainty and safety fears.
- Changes to the experience people have when using recreational resources due to increases in numbers of people using them i.e. displacement of people from one area to another.
- Tranquillity and ambience experienced by recreational receptors.

20.10. SCC considers that this approach is appropriate and reasonable because public rights of way have unique additional characteristics that are not generally shared with other highways. Specifically, they make a significant contribution to the local communities' sense of place, mental health, physical health, and overall well-being.

20.11. In addition, the contribution that public rights of way make to community access and sense of place have an important relationship to the offer and

function of the visitor economy, particularly in rural areas of Suffolk where economic activity beyond food production and processing is limited.

- 20.12. Therefore, whilst public rights of way do form part of the whole transport network, they have a unique function and relationship to people and place, that SCC considers should be effectively evaluated by the applicant. This will ensure the impacts are properly understood and weighed in the planning balance, and effective mitigation measures can be designed and delivered to maintain, and where appropriate enhance, these unique characteristics and contribution to Suffolk's countryside and communities.

### **Pre-commencement works**

- 20.13. The scoping report should also consider the assessment of impact from pre-commencement works such as archaeological, ecological, ground and drainage investigations, creation of accesses and site clearance which can have a direct impact on PRow and their users. This can include traffic, noise, visual disturbance and temporary closures which impact on the amenity value and the functionality and connectivity of the network.
- 20.14. SCC requests that a pre-commencement management plan including mitigation measures should be produced as part of the DCO application. SCC will also expect a Public Rights of Way Management plan to be produced as part of the DCO application.

### **Health & Wellbeing**

- 20.15. Consultation responses highlighted the potential impact on resident's enjoyment of where they live, access to leisure amenities and the impact this will have on quality of life and hence physical and mental health. This again reinforces the SCC position that the impact on the amenity value of PRow and the access network needs to be adequately addressed.
- 20.16. 10.5 Design measures
- 20.17. The potential embedded design measures include the design of the onshore scheme to avoid community facilities and amenities and visitor attractions. The public rights of way network is a community facility and amenity, particularly in rural Suffolk and needs to be considered as such.
- 20.18. 10.5.4 It is noted that possible embedded design measures include erecting signage where paths are closed. However, SCC expect that the presumption should be to avoid any closing of the PRow network as this reduces the ability of the community to access and enjoy where they live, improving their quality of life and therefore overall health. If a PRow must be closed, then SCC will expect this to be justified, for as short a duration as possible and alternative suitable routes provided for all classes of user entitled to use those routes (i.e. equestrians, walkers, and cyclists on bridleways).

### **Landscape & Visual amenity**

- 20.19. Visual baseline -Cable Corridor to Southwold

20.20. 13.3.31 and 13.3.32 Visual receptors for the underground HVDC cable corridor should include users of the King Charles III England Coast Path (National Trail) which will follow a different alignment than the currently promoted Suffolk Coast Path.

20.21. 13.3.33 Visual receptors for the landfall site at Southwold should include users of the King Charles III England Coast Path (National Trail) which is proposed to follow a coastal route in this location, unlike the currently promoted Suffolk Coast Path

## **Traffic & Transport**

20.22. 15.3.7 Baseline- Walking & Cycling routes

20.23. The applicant has correctly identified the definitive map as the source for data relating to Public Rights of Way; this information is held by SCC and the applicant must ensure that it acquires this digital data from SCC to ensure accuracy.

20.24. Although the applicant lists the number of PRow affected, it doesn't identify these individually in chapter 15 or on Fig 15-1 Baseline Transport Network, nor does it distinguish between the legal status, and the classes of user legally entitled to use them, i.e. footpath, bridleway, restricted byway and byway open to all traffic.

20.25. Sufficient information such as the correct identification of the legal status of the PRow is needed to ensure a comprehensive and accurate assessment of impact on the different types of PRow user and the appropriate mitigation measures.

20.26. Going forward, SCC expects the applicant to correctly define and label all PRow including status and widths where known. PRow should be labelled in accordance with the standard SCC convention (as shown on the Definitive Map) and kept as standard throughout all documents enabling consultees to readily identify which PRow are affected. Guidance for this is provided with the digital data for the Definitive Map that the applicant must acquire from SCC.

### **20.27. Omissions in the baseline data**

- The baseline data needs to include the PRow in Saxmundham, namely public footpath 23 (E-460-023/0) which is the start of the public footpath through the converter station site (Sternfield FP6 - E-491/006/0)).
- The data also needs to recognise that the King Charles III England Coast Path has been approved for the section Aldeburgh to Southwold and works are underway for opening of this section. The section from Southwold to Pakefield will be approved during this development and should be included.
- The baseline should also identify and consider the designated quiet lane network.

- The applicant must identify the wider access network and ensures continuity of the access network including links to U roads, quiet lanes and promoted routes,
- Cycle tracks - although there may be no designated cycle tracks crossing the cable corridor, there are public bridleways that do, and these allow for cyclists as well as equestrians.

#### 20.28. 15.4 Potential impacts

20.29. This should also include the impact on the quality of the user experience, i.e. the amenity value of the PRow & access network, in addition to the impact of closures /diversions.

20.30. The impact of temporary closures of PRow should not be underestimated, as their value for local amenity could be severely reduced or removed during works. It will be unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects

#### 20.31. 15.5 Design & Control measures

20.32. 15.5.5. SCC require that where PRow closures are required, then there should always be an alternative route provided or alternative compensation measures.

20.33. SCC welcomes the recognition of the potential for works leading to a decline in pedestrian and cycle amenity but is concerned that the proposed methodology only relates to cycling and pedestrian facilities integrated with the road network and not the PRow network, the vast majority of which are entirely separate from the road network.

20.34. This is illustrated by the fact that Table 15.2 Scope of assessment only recognises cyclists and pedestrians and not all classes of non motorised users who are legally entitled to use PRow depending on its status, for example, equestrians, walkers, and cyclists on public bridleways.

20.35. Similarly in Table 15.3 Sensitivity of receptors, the receptor value and sensitivity criteria are unclear when referring to PRow. The definition appears to relate to cycling and walking routes within the road network and not the PRow network. Likewise, in para 15.7.29, the pedestrian and cyclist amenity is considered to be affected by traffic flow, traffic composition and pavement width /separation from traffic, with thresholds for significance relating to traffic flow.

20.36. In this development, PRow are likely to impacted by traffic in a variety of ways – used as construction accesses and haul road, crossed by haul roads, or run adjacent to haul roads and construction accesses. There will be fear, intimidation, and uncertainty for PRow users as to where and when they might encounter traffic on previously traffic free rural PRow. This is particularly pertinent for vulnerable users and equestrians.

20.37. 15.7.39 SCC welcome an assessment of PRow where they are directly affected by construction works but believe that the criteria and thresholds in table 15.6 and 15.7 are too crude for PRow and do not realistically reflect the impact on the quality of the user experience.

20.38. Conclusion

20.39. At present, the scoping and assessment of impact on pedestrian and cycle amenity in the traffic & transport chapter does not actually cover the assessment of impact on receptors using the PRow network.

**Socioeconomics, recreation & tourism**

20.40. 16.3 Baseline conditions: Fig 16-2 Recreational & community receptors DRW no LL-ARP-FIG-ECO-0010-P02 and 16.3.23 Promoted recreational routes.

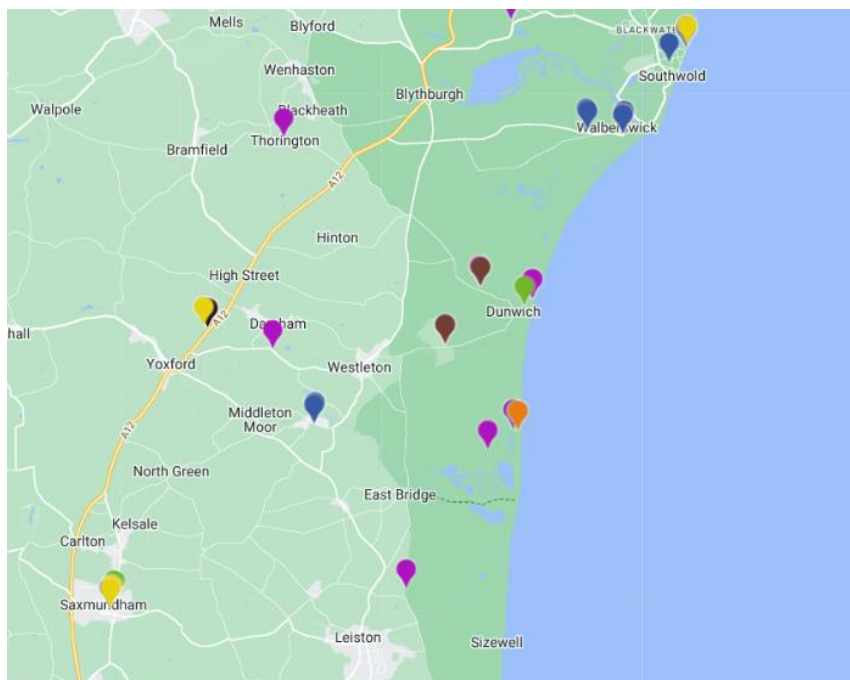
20.41. The recreational and community receptors are described as community facilities and open space, visitor attractions and promoted recreational routes.

20.42. SCC consider that the public rights of way network should itself be considered a visitor attraction as they play a vitally important part in the offer and function of the visitor economy enabling access to the countryside and wildlife of the Suffolk coast area.

20.43. The baseline should also include the King Charles III England Coast Path National Trail and the many other local authority promoted walks and rides, e.g. Middleton Circular Walk, National Landscapes promoted walks.

20.44. The information listed for the promoted recreational routes is incomplete and is not an accurate reflection of the recreation baseline. There are many more promoted routes in the study area as illustrated on this extract from the SCC Discover Suffolk website, for example, the Middleton Circular Walk

20.45. SCC considers that all the PRow network should be included in scope as recreational routes as this is one of the fundamental roles they serve for local communities and the visitor economy as well as enabling active travel.



[Interactive Map - Search for walks, cycle and horse rides in Suffolk \(discoversuffolk.org.uk\)](https://discoversuffolk.org.uk)

20.46. In addition, the King Charles III England Coast Path National Trail needs to be included – the section from Aldeburgh to Southwold has been approved by the Secretary of State and works are underway for opening of this section. The section from north Southwold to Pakefield has yet to be approved but will be open during the timescale for this development. The National Trail is a linear route with a coastal margin seaward of the trail much of which will have rights of access. This land should also be scoped as accessible open space and will include the beaches which should be included as visitor attractions in their own right. The Applicant must obtain open access mapping from Natural England.

20.47. Table 16-8 Scope of the assessment

20.48. It is very disappointing that the chapter covering recreation has not recognised the importance and value of the PROW network as a recreational resource for local communities and visitors, and as a result raises little confidence that the applicant will adequately assess and mitigate the impacts.

20.49. SCC welcome that the report recognises that there is the potential for the construction of the onshore scheme to result in direct impacts on PROW including promoted recreational routes, but firmly disagrees that these are adequately considered or addressed in Chapter 15 Traffic and Transport.

20.50. The proposed methodology for traffic and transport is limited to cycling and pedestrian facilities integrated with the road network and not the PROW network, the vast majority of which are entirely separate from the road network. It considers a limited set of factors such as severance, pedestrian delay, increases in traffic flow as the amenity factor and severance.

20.51. Thus, the scoping and assessment of impact on pedestrian and cycle amenity in the traffic & transport chapter does not actually reflect the true impact on the quality of the experience of the receptors using the PRow network.

### **Cumulative Impact**

20.52. As already stated, SCC do not believe that PRow and amenity has been adequately addressed and this shortfall is further compounded when relying on the intra and inter project cumulative effects to provide an accurate and meaningful assessment.

20.53. Intra-project effects of multiple aspects on receptors.

20.54. It is disappointing that the applicant has chosen not to consider holistically the potential impacts from the development on the public rights of way & access network and the amenity value to its receptors. It is also disappointing that it has chosen not to consider PRow and amenity as a separate theme but has instead split this aspect across several other chapters, namely health and wellbeing, landscape and visual amenity, traffic and transport and socio-economic, recreation and tourism.

20.55. Therefore, the intra-project effects should be a particularly important approach to providing an accurate and meaningful impact assessment for the PRow & access network and its receptors.

20.56. However, Table 29-1 the intra project effects matrix is failing to recognise this. For example, landscape and visual is not linked to health and wellbeing, socio economic and traffic and transport even though aspects of PRow, access and amenity sit within all those chapters.

20.57. If the applicant is not going to consider PRow & amenity as a separate theme in this application, then the intra-project effects must do so.

### **Inter-project effects**

20.58. The PRow & access network is facing an unprecedented number of developments which will both disrupt users and physically change the connectivity and functionality of the network and in the view of SCC, significantly reduce the amenity value for residents and visitors.

20.59. It is very concerning that the lack of a single assessment approach for public rights of way, access and amenity will weaken the recognition of, and assessment of the cumulative effects, in particular the repeated closure of PRow and disruption to the public users, and the increased duration of these impacts as a result of the stream of NSIPs in a relatively small geographical area.

20.60. The multiple and sequential projects will potentially sterilise the access network, particularly on the HVDC corridor in the area around Middleton where the new Sizewell Link Road is due to be constructed and around the Friston substation and the Saxmundham converter station sites.

- 20.61. The construction of the converter stations and the NG substation as part of the SPR EA1N and EA2 developments will permanently divert an important public footpath and temporarily disrupt many of the other PRow that serve as the main amenity for the village. These same PRow and the newly diverted PRow will then be subject to the construction of the Lionlink HVAC cable corridor and amendments to the NG substation, extending the disruption and loss of amenity for the local community. SCC will expect mitigation and compensation.
- 20.62. SCC support co-ordination with the other proposed projects to reduce the duration and severity of the overall disruption on the PRow network, including installation of ducting, sharing of cable corridors and construction infrastructure.
- 20.63. SCC consider that the 500m zone of influence for socio-economic, recreation and tourism is far too limited. PRow are recreational facilities that people use to create circular and linear walks that will extend more than 500m beyond the study area.



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**From:** Water Hydrants <Water.Hydrants@suffolk.gov.uk>  
**Sent:** 19 March 2024 09:45  
**To:** Lionlink Interconnector  
**Subject:** Scoping enquiry - Application by National Grid LionLink Limited (the Applicant) for an Order granting Development Consent for LionLink (the Proposed Development).

You don't often get email from water.hydrants@suffolk.gov.uk. [Learn why this is important](#)

Good morning

On behalf of the Suffolk Fire and Rescue Service our response is as follows.

The Suffolk Fire & Rescue Service has considered the information provided and are of the opinion that at this stage we have no formal comment to make. However, this will be reconsidered if service conditions change.

Kind regards

Water Officer.

Suffolk Fire and Rescue Service

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## **The LionLink Project**

**Planning Inspectorate Reference EN020033**

**The Planning Act 2008 (as amended) & The Infrastructure Planning  
(Environmental Impact Assessment) Regulations 2017**

**Scoping Report by National Grid for an Order Granting  
Development Consent for LionLink**

**Suffolk Constabulary Response to the Planning Inspectorate on its  
Scoping Opinion**

**March 2024**

**Leigh Jenkins**

**Business Liaison Manager**

**Suffolk Constabulary**



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[www.suffolk.police.uk](http://www.suffolk.police.uk)

# The LionLink Project: Suffolk Constabulary Response to the Planning Inspectorate on its Scoping Opinion \*

## Introduction

1. Suffolk Constabulary (SC) are the relevant Police Authority and a 'Prescribed Consultee' in this Development Consent Order (DCO) process, pursuant to The Infrastructure Planning (Applications: Prescribed Forms & Procedure) Regulations 2009.
2. This Technical Note therefore responds to the Planning Inspectorate's consultation letter dated 7<sup>th</sup> March 2024, in relation to the LionLink Project.
3. SC has reviewed the Scoping Report submitted by National Grid, from an operational perspective, and a summary of the key areas for inclusion within the Environmental Statement (ES) or in an accompanying Technical Assessment, are outlined below.
  - ❖ **Scoping Work** – is required to identify the likely effects (impacts) of Abnormal Indivisible Loads (AIL's) HGV traffic generation, the construction workforce & plant/ machinery/material storage on SC's operations;
  - ❖ **Scheme Design, Mitigation & Management Measures** – are required to avoid, reduce & mitigate for the likely Project impact on SC's operations during the construction phase of the development;
  - ❖ **Suitable DCO Requirements &/or Heads of Terms of Agreement via a Section 106 planning obligation** – are required to secure funding & new facilities provision, as necessary, to increase the capacity & maintain service levels delivered by SC's estate, vehicle fleet & staff assets to mitigate & manage the impacts arising;
  - ❖ **Suitable Terms of Reference, Membership & a Communications Strategy for a Transport, Community Safety & Cohesion Working Group** – are required to inform & assist the management of the construction phase of the Project, enabling a coordinated response from SC & its blue light partners, such as the East of England Ambulance Service NHS Trust (EEAST) & Suffolk Fire & Rescue Service;
4. SC together with its blue light partners is therefore keen to work with National Grid to address these points at an early stage, and agree/ secure suitable mitigation and management measures as part of the DCO process.
5. SC is routinely involved with Nationally Significant Infrastructure Projects (NSIP's) affecting the County, and has successfully engaged with NSIP promoters to ensure that its operational capacity and resources are maintained.

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6. This in turn has enabled NSIP Projects which draw down on SC's resources to be delivered with greater certainty, and within defined timelines, due to the increased operational capacity provided to SC by the DCO mitigation funding processes.
7. With this in mind, it is noted that National Grid has not yet engaged with SC at previous non - statutory consultation stages of the Project, and early engagement with SC through this EIA scoping process is therefore now encouraged.
8. SC's operational capacity and service resource position in the context of the LionLink Project is outlined below.
9. Construction phase impacts arising from the LionLink Project would be policed by the 'Halesworth Locality' Community Policing Team (CPT) including specialist officers supporting the CPT linked to the Countywide police teams.
10. The CPT and its supporting specialist officers are operating at capacity, and any additional demand for police, community safety and cohesion resources arising from the Project would require mitigation funding.

### **LionLink Project – Proposed Scheme Overview**

11. The LionLink Project comprises a new interconnector with a capacity of up to 1.8 gigawatts (GW) between the National Electricity Transmission Systems of Great Britain (GB) and the Netherlands, including a connection into a wind farm located in Dutch waters.
12. The National Grid Environmental Impact Assessment (EIA) Scoping report covers the GB components (onshore and offshore) only as follows;

#### ***Onshore Scheme***

- ❖ The Friston Substation;
- ❖ Proposed high voltage alternating current (HVAC) Underground Cables between the proposed Converter Station located east of Saxmundham, Suffolk & Friston Substation;
- ❖ The proposed Converter Station east of Saxmundham – the converter station would convert electricity from Alternating Current (AC) to Direct Current (DC) & comprise buildings, plant, transformer compound, switchgear & access road(s) on a site of up to 6 ha;
- ❖ Proposed high voltage direct current (HVDC) Underground Cables between the Converter Station east of Saxmundham, & a proposed Landfall Site at either

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Southwold or Walberswick;

- ❖ Submarine electricity cables from a proposed Landfall Site (at either Southwold or Walberswick) at the UK coast to the edge of the UK Exclusive Economic Zone (EEZ);

### ***Offshore Scheme***

- ❖ Routing from Landfall across the Southern North Sea to the boundary between the UK & Netherlands EEZ;
- ❖ Two HVDC Submarine Cables – connecting to a Tenne T offshore platform in the IJmuiden Ver and Nederwiek windfarm zones located in Dutch waters;
- ❖ One dedicated metallic return (DMR) cable;
- ❖ Up to two fibre optic cables;
- ❖ Associated external cable protection (e.g. rock, berm, concrete mattresses) where the required burial into the seabed cannot be achieved;

13. An overview of the construction phase (programme) for the Project is outlined below.

### **Construction Phase**

14. Following confirmation of any DCO for the Project, commencement of construction works is envisaged in 2026, with completion in 2030. The anticipated duration of each key part of the 'onshore project component' is outlined below;

### ***Onshore Scheme***

- ❖ Friston Substation – 13 to 24 months depending on whether 'amendment works' to a substation provided by another electricity transmission project, or a complete 'new build' are required;
- ❖ Installation of the proposed HVAC Underground Cables – up to 1 year, or up to 2 years if construction scope includes up to two additional electricity transmission projects;
- ❖ Converter Station – up to 4 years from initial groundworks to erect buildings & install specialist electrical equipment through to commissioning;
- ❖ HVDC Underground Cables – up to 3 years or up to 5 years if constructing an additional electricity transmission project, running in parallel with the proposed Converter

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Station;

- ❖ Installation of the proposed Landfall – up to 20 months, potentially over two periods in different years;
- ❖ Temporary Construction Compounds – these are required for the storage of plant/ machinery, stockpiled materials, site management offices, staff welfare facilities & parking;
  - Primary Temporary Construction Compounds to be in place for the duration of the cable construction;
  - Secondary compounds for the majority of the construction phase, with the number & location of compounds to be determined through ongoing design;
- ❖ Enabling Works – are required to construct the scheme & are likely to include;
  - Installation of bell mouths to enable access to existing/ new roads;
  - Creation of access tracks – location & routeing not currently known;
  - Fences erected around works/ compound areas with gated access;
  - Ground water & surface water controls;
  - Temporary drainage works & silt fencing;
  - Culvert installations (or temporary bridges) to facilitate temporary access tracks over ditches & water courses;
  - Topsoil stripping & storage;
- ❖ Access during installation – assessment to be carried out of the public road network to identify roads which may be suitable for HGV's, low loaders with cranes, cable delivery vehicles (AIL's) & any hazardous loads;
- ❖ Temporary access & haul roads & temporary bridges across watercourses/ drains are required;

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## ***Offshore Scheme***

- ❖ Pre-installation marine survey to be undertaken prior to cable lay & burial;
- ❖ Unexploded ordnance (UXO) identification & clearance in liaison with the Marine Management Organisation;
- ❖ Seabed preparation & route clearance of boulders & third-party subsea assets, such as fishnets/ wires;
- ❖ Cable lay & burial utilising Cable lay vessels;
- ❖ External cable protection, utilising rock berms, concrete mattresses or rock/grout bags;

## **Suffolk Constabulary's Principal Areas of Interest & Concern**

### **Information for Inclusion within Scope of the Environmental Statement &/or in a Technical Assessment & related Mitigation & Management Measures**

15. Suffolk Constabulary's principal areas of interest and concern which are likely to significantly impact on its operational capacity and resources, requiring assessment with the ES and/or within an accompanying Technical Assessment, along with appropriate mitigation and management measures are outlined below.

### **Highways, Traffic, Transport & Abnormal Indivisible Loads (AIL's)**

16. It is evident from the EIA Scoping Report that the construction phase envisages a major level of onshore and offshore construction works, taking place as part of an extensive 4-year construction programme required to implement the LionLink project.

17. The highways, traffic, transport and AIL effects arising and likely impact upon SC's operational capacity and resources, therefore need to be determined, and included within the scope of the ES, and/or within a Technical Assessment accompanying an application for a DCO.

18. Once this information is presented and assessed, any necessary mitigation and management measures ought to be secured and implemented through DCO Requirements, and/or through a Section 106 planning obligation as part of any DCO Approval.

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### ***Abnormal Indivisible Loads***

19. SC does not have a dedicated AIL Team and the resourcing of AIL's is managed on an 'overtime basis'.
20. AIL movements through Suffolk are therefore required to book a 'police escort' in advance, and AIL's are then scheduled - subject to the county-wide demand and SC's resource capacity at a given point in time.
21. The ES/ Technical Assessment should undertake impact modelling of AIL's to determine capacity v demand (along with the duration period) where developer funding for dedicated police capacity is usually required to enable movements to be scheduled with certainty.
22. Increased use of the Suffolk Road network by HGV and light traffic requires the 'AIL escort guidance' and 'risk factors' to be reviewed, particularly where a sustained increase in HGV movements on local roads is influenced by a major construction project destination.
23. If AIL movements are likely to breach double white lines and/or require traffic to be redirected, this service can only be managed by the police.
24. At this stage it is envisaged that developer mitigation funding for a 'Dedicated Police AIL Team' is likely to be required, which would provide the Project with capacity to schedule AIL movements to suit the construction programme.

### ***Additional Roads Policing Capacity***

25. The highways and transport effects arising, including the increased use of Suffolk's principal and local road network by construction phase HGV's/ LGV's, the requirement for temporary diversion of traffic due to road closures and route diversions are likely to significantly impact on SC's capacity and resources.
26. The ES/Technical Assessment should undertake traffic modelling to enable SC to determine the need for any increase in Roads Policing, to manage safety on the road network, and minimise the likelihood of any incidents and accidents.
27. Any increase in Road Traffic Collisions (RTC's) has the potential to lead to road closures and diversions which would impact on SC's roads policing capacity and the local community.
28. Proposed 'Control Measures' such as the preparation of a Construction Traffic Management Plan (CTMP) are welcomed, and SC would wish to liaise with National Grid in relation to this matter.

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## Population Increase - Community Safety, Cohesion & Policing Effects

29. It is evident from the EIA Scoping Report that an extensive 4-year construction programme is needed to deliver the LionLink project, and consequently, a significant number of construction workers are likely to be required to implement the large scale, wide ranging and specialised components of the scheme.
30. Evidence from SC's Crime Information System - Athena & Storm statistical database, indicates that population increase would give rise to an increase in crime and incidents against the person (e.g. violence, sexual, burglary, vehicle theft & criminal damage) insofar as the construction workers and their families would be the victims of such crime, with an increased impact on police capacity and resources.
31. The community safety, cohesion and policing effects arising from the population increase linked to construction workers, is therefore likely to impact on SC's operational capacity and resources. This includes the potential for increased crime and disorder arising against the person, and associated with the local evening economy.
32. This would need to be determined and included within the scope of the ES, and/or within a Technical Assessment accompanying an application for a DCO.
33. Once this information is presented and assessed, any necessary mitigation and management measures ought to be secured and implemented through DCO Requirements, and/or through a Section 106 planning obligation as part of any DCO Approval.

### ***Workforce Modelling***

34. Information to determine the nature of the construction workforce, their home origin and location of any temporary accommodation would need to be included within the scope of the ES/Technical Assessment, and the following analysis is required;
  - ❖ Overall numbers of construction workers;
  - ❖ Numbers of construction workers disaggregated by month & year over the construction phase;
  - ❖ Home origin of construction workers & numbers (proportion) from outside of Suffolk;
  - ❖ Accommodation arrangements for non-locally based construction workers & their families – including provision of any temporary project accommodation on site, & the likely take up of holiday let, hotel & bed & breakfast accommodation locally;

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### ***Theft – Plant, Machinery & Material Storage***

35. The construction phases of development lead to an increase in the incidence of criminal activity, such as property-based theft and vandalism, which is a fact acknowledged by the Chartered Institute of Building in its publication(s) on ‘Crime in the Construction Industry’.
36. Information, including a schedule of the plant, machinery and materials to be stored at construction compounds, and elsewhere, and the security measures to be employed (including crime reporting to SC) is required, and would need to be included within the scope of the ES/Technical Assessment.
37. Any theft incidents would lead to an increased impact on police capacity and resources.

### **Joint Working - Blue Light Partners**

#### **Transport, Community Safety & Cohesion Working Group**

38. In light of the above, SC recommends that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety & Cohesion Working Group, is established at an early stage in the DCO preparation process and in advance of the Examination.
39. This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from ‘blue light partners’, incorporating representatives from Suffolk Constabulary, EAST of England Ambulance Service NHS Trust and Suffolk Fire & Rescue.

### **Conclusions**

40. Suffolk Constabulary welcomes the opportunity to respond to the LionLink EIA Scoping Report, and following review of the documentation notes that it is currently deficient in its scope of assessment concerning the potential Project impacts on SC, as outlined above.
41. SC consider that the Project is likely to give rise to significant effects on its operational capacity and resources, which ought to be assessed in order to determine appropriate mitigation and management measures.
42. The Project is therefore considered to adversely affect SC’s ability to maintain and deliver the current levels of service to the local community, including its statutory duties.
43. Identified impacts arising from the Project should be addressed by employing appropriate mitigation and management measures, to be secured and implemented through DCO requirements and/or a Section 106 planning obligation, as part of any Development Consent Order approval.

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44. This approach ought to be reflected in a Statement of Common Ground to clarify the position reached and inform the Examination process.
45. The measures ought to include a process to assist SC and its blue light partners to plan for and implement coordinated responses to construction phase impacts and incidents - to ensure current, and sustainable, levels of community safety, cohesion and policing are maintained in the local area.
46. We trust this is of assistance and look forward to working with National grid to satisfactorily address the points raised.

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---

**From:** Stephen Vanstone <[REDACTED]>  
**Sent:** 02 April 2024 14:52  
**To:** Lionlink Interconnector  
**Cc:** Trevor Harris  
**Subject:** RE: EN020033 - LionLink - EIA Scoping Notification and Consultation  
**Attachments:** LION - Statutory Consultation Letter.pdf

You don't often get email from [REDACTED]

Good afternoon Jack,

I can confirm that Trinity House has no comments to add concerning the Scoping Report.

Kind regards,

**Stephen Vanstone**

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED] | [REDACTED]  
[www.trinityhouse.co.uk](http://www.trinityhouse.co.uk)



TRINITY HOUSE

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**From:** Lionlink Interconnector <[LionlinkInterconnector@planninginspectorate.gov.uk](mailto:LionlinkInterconnector@planninginspectorate.gov.uk)>  
**Sent:** Thursday, March 7, 2024 11:09 AM  
**To:** Navigation <[navigation.directorate@trinityhouse.co.uk](mailto:navigation.directorate@trinityhouse.co.uk)>  
**Cc:** Thomas Arculus <[REDACTED]>  
**Subject:** EN020033 - LionLink - EIA Scoping Notification and Consultation

Dear Sir/Madam,

Please see attached correspondence on the proposed LionLink.

Please note the deadline for consultation responses is **04 April 2024**, which is a statutory requirement that cannot be extended.

Kind regards,

Jack Patten



The Planning  
Inspectorate

**Jack Patten** (He/Him)  
EIA Advisor  
The Planning Inspectorate

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DPC:76616c646f72





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Your Ref: EN020033  
Our Ref: 65492

Ms Laura Feekins-Bate  
Senior EIA Advisor,  
The Planning Inspectorate  
Environmental Services, Operations Group 3  
Temple Quay House  
2 The Square  
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3<sup>rd</sup> April 2024

Dear Ms Feekins-Bate

**Nationally Significant Infrastructure Project  
LionLink (EN020033)  
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities' local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups, and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

## **Environmental Public Health**

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*<sup>1</sup>, setting out aspects to be addressed within the Environmental Statement<sup>1</sup>. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

### Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold, i.e. an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

## **Electric and Magnetic Fields (EMF)**

UKHSA notes that National Grid propose to scope out the potential EMF impacts on human health.

### Recommendation

We request that the ES includes details of the full assessment undertaken during the detailed design phase on all equipment capable of producing EMFs and appropriate measures implemented to ensure compliance with all relevant standards and legislation. For

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1

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

further information, please see the UKHSA guidance document ‘Content of Environmental Statements accompanying an application under the NSIP Regime’<sup>1</sup>

### **Human Health and Wellbeing – OHID**

This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report OHID wish to make the following specific comments and recommendations:

#### **Socio-economics – Accommodation demands**

The scoping report does not identify the peak number of construction workers or projected numbers of non-home based workers. The scoping report (Table 16.8) proposes to scope out accommodation demands and does not specifically consider this impact within cumulative effects.

The wider study area has a considerable number of large developments, including NSIPs, where the cumulative number of non-homed based workers may be significant and lead to accommodation scarcity. Additionally cumulative impacts from the number of developments have been raised in previous non statutory consultation by local stakeholders in terms of quality of life, consultation fatigue and consequent effects on mental health and wellbeing (Para 10.2.3 & 16.2.2).

The presence of significant numbers of non-home based workers could foreseeably have an impact on the local availability of accommodation including affordable housing, particularly that of short term tenancies and affordable homes for certain communities. For example, where there may be an overlap between construction workers seeking accommodation in the private rented sector, and people in receipt of housing benefit seeking the same lower-cost accommodation.

The cumulative impact assessment will need to consider this across the wider study area but also identify the potential for any local impacts that may affect the capacity of sectors to respond to change.



### Recommendation

The peak numbers of construction workers and non-home-based workers should be established and a proportionate assessment undertaken on the impacts for housing availability and affordability and impacts on any local services.

Any cumulative effects assessment should consider the impact on demand for accommodation by construction workers and the likely numbers of non-home-based workers required across all schemes.

Large numbers of construction workers can impact on the local health care system. An assessment of impacts from construction workers should also consider impacts on accessing local services.

### **Community mental health and wellbeing**

The broad definition of health used by the World Health Organisation (WHO), includes reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life.

The scoping report makes reference to the potential impacts on quality of life, where cumulative impacts from the number of developments have been raised in previous non statutory consultation by local stakeholders in terms of quality of life, consultation fatigue and consequent effects on mental health and wellbeing (Para 10.2.3 & 16.2.2).

OHID note the intention to report local mental health data to identify community sensitivity, but this does not identify the nature and scale of local concerns and effects on mental health. Opportunities should be explored to further understand local community perception for impacts on their quality of life and resultant effects on mental health and wellbeing.

### Recommendation

When estimating community anxiety and stress in particular, a qualitative assessment may be most appropriate. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures.

This may involve conducting resident surveys but also information received through public consultations, including community engagement exercises. The Mental Well-being Impact Assessment Toolkit (MWIA) contains key principles that should be demonstrated in a project's community engagement and impact assessment. We would also encourage consultation with the local authority's public health team, who are likely to have Health Intelligence specialists who will have knowledge about the availability of local data.

The Mental Well-being Impact Assessment Toolkit (MWIA)<sup>2</sup>, could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets. Baseline indicators the assessment would benefit from including social cohesion/connectedness, satisfaction with local area and quality of life indicators owing to their established links to mental health and wellbeing.

In terms of sources, we would draw your attention to the following:

- OHID Fingertips – Mental Health and Wellbeing JSNA
  - Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data
- Office for National Statistics - Wellbeing Indicators
  - Range of datasets related to wellbeing available including young people's wellbeing measures, personal wellbeing estimates and loneliness rates by local authority

## **Report Methodological Approach**

### **Study area**

The population and health chapter identifies a study area of 250m from the scheme boundary (Para 10.3.3), but notes the transport and socio-economics impacts may require a wider study area. The chapter will also consist of findings from other technical chapters such as noise and air quality, which will have their own specific study areas.

It is normal for the remaining issues scoped in to have a 500m study area, based on guidance contained within DMRB LA112. The scoping report does not provide any justification for not using a 500m study area.

### **Recommendation**

A study area of 500m should be utilised for the population and human health chapter, other than for topic specific findings which have existing agreed study areas. Suitable justification is required for a study area of less than 500m.

### **Report Format**

The baseline health data has been split into separate sections of the route options. This approach is welcomed to enable local communities to be considered separately and assessments of significance defined by the local context of each community, rather than an overall conclusion across route wide effects.

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<sup>2</sup> [Mental Wellbeing Impact Assessment Toolkit](#), (National MWIA Collaborative (England), 2011) - A toolkit with an evidence-based framework for improving well-being through projects.

The structure of the Population and Human Health chapter should be structured such that a reader can consider route wide and then each of the individual sections of the scheme separately. This avoids the need for repetition and enables the assessment methodology to be followed for each community. This structure will enable the creation of community impact reports that can be more easily utilised within the Non-Technical Summary and be more accessible to local communities to understand the impacts and effects relevant to their community.

Recommendation

The Population and Human Health Chapter within the ES should be structured such that naturally defined communities should be assessed each in turn, in addition to route wide effects where appropriate. The report structure should enable the assessments of significance for local communities to be considered separately and defined by the local context of each community, rather than an overall conclusion across route wide effects.

Yours sincerely

On behalf of UK Health Security Agency

*Please mark any correspondence for the attention of National Infrastructure Planning Administration.*



## Walberswick Parish Council

31 March 2024

### **Response of the Walberswick Parish Council, a Statutory Consultee to the Planning Inspectorate on NGV's Lionlink Proposal**

The Walberswick Parish Council (WPC) has been invited as a Statutory Consultee to respond to the Environmental Impact Assessment Scoping Report (SR) for the proposed Lionlink (LL) project. Walberswick, a pristine, historic village renowned as one of the top destinations for nature-based tourism on the Suffolk Coast, has been identified by NGV as one of its preferred landing sites and cabling routes for LL.

The WPC, with wide support from our village community, has focused its response on the sections of the SR specific to the landing site and the cabling route proposed for Walberswick. This in no way suggests that WPC is supportive of any elements of the scheme nor the soundness of the SR, but rather that we are focusing our submission on the area we know best so as to assist in holding NGV fully to account.

Most critically, we draw the attention of the Planning Inspectorate to the fact that LL G2 site is in the very heart of Walberswick village. Despite being made aware of this during the pre-consultation stage, the Developer has chosen to submit a SR that misrepresents and downplays the location of G2 – known locally as Manor Field. It is a gross oversight of LL not to state this positioning clearly. As a result, LL has prepared a SR that is inadequate in terms of its approach to the potential impacts that need to be considered and resolved in relation to the Walberswick site.

LL incorrectly states that the site is “south” of Walberswick Village. In another section (6.3.45) it states that homes are located 5m “to the north” of the G2 landfall sites. These are misrepresentations of reality. Manor Field is within the village and, as such, directly abuts and is surrounded by homes not only on the north, but on the north, east and west -- including those within the village Conservation Area. It is adjacent to a seasonal caravan park and camping ground at one corner. G2 is also ringed on four sides by heavily used Public Rights of Way (PRoWs) that lead to the popular Walberswick swimming beach and that are part of nationally recognised walking trails that connect Dunwich, Walberswick and Southwold. It is adjacent to, and will have to cross, highly protected SFA, SAC and RAMSAR sites. There is no road access to the G2 site not because Manor Field is remote, but because it is a beauty spot that is an integral part of Walberswick village, accessed by PRoWs and by back garden gates of the houses on which it abuts.

Because of this unique situation, we request that the inadequacies of the SR be challenged robustly in relation to the Walberswick G2 option. LL states in 10.5.3 that “*where it is not possible to avoid sensitive receptors, a number of measures will be embedded into the design to limit any effects.*” Specifically, LL says that “*where possible, the proposed Onshore Scheme would be designed to avoid residential properties, community facilities and amenities as well as visitor attractions.*” We cannot understand why LL would have made such an inappropriate choice as G2 given that it directly contradicts its own stated design imperatives. However, as LL has chosen to persist, then it must be compelled to Scope-In more impacts and, where impacts are Scoped In, should not be permitted to use “desk studies” for baseline data or to understand likely impacts. Instead, LL must base its analysis on appropriate bespoke surveys, interviews and case studies. The analysis should properly be done to cover a period of a year to take into account the differing seasonal impacts on the residential properties, amenities and attractions, particularly given that the basis of the Village’s economy is on year-round nature-based tourism.

Within this context, the remainder of our submission highlights by Chapter the specific areas of concern and where amendments are required.

### Chapter 3. Assessment of Alternatives

The first step should be in relation to Chapter 3 of the SR that deals with the assessment of alternatives. Given that LL has identified a preferred site in Walberswick that is within a residential area, with community amenities and visitor attractions, it needs to make much more transparent why they are dismissing more reasonable alternatives including an Integrated Offshore Grid, landfall at brownfield sites, or co-location with other interconnector and offshore projects. There are sentences in the SR (such as 6.3.45) where LL admits that G2 is within **5m of residences**. Without much greater detail and transparency with respect to alternatives, it is impossible to determine whether there truly are no better alternatives to putting the landing site into the heart of a rural community surrounded by human and ecological receptors and within 5m of village homes.

### Chapter 4. Legislation and Policy Overview

Table 4.1 references several local planning documents. However, it leaves out the Conservation Area Appraisal and Management Plan for Walberswick and the Walberswick Parish Plan. Walberswick Parish Council is also engaged in the process of a Neighbourhood Development Plan. All these relevant documents must be used to better inform the EIA. Walberswick documents can be provided to LL by the Parish Council.

### Chapter 5. EIA Method and Approach

Population size is a key element in impact analysis particularly on human receptors. It is obvious from the SR that LL’s approach will not accurately reflect this impact in Walberswick if it relies solely on ONS census and other public source data. For the G2 site, it is essential that data and analysis is complete given that the site is within a residential area. In addition to homes and ProWs which are within 5m, the tourist beach is only some 65m from the site. Walberswick’s only main road, its village shopping, and many historically significant homes in the Conservation Area are within 100m of the landing site and because of its compact design, the majority of the village including playgrounds, village hall and all amenities are within 500m of G2.

Walberswick has circa 350 homes. About half are occupied by full time residents with others used by part-time residents most of whom stay in the village throughout the year but who are not likely to show up in ONS data. Another portion of the residences are used as holiday lets many of which are large and therefore accommodate in excess of 10 guests. There is also hotel accommodation at two pubs and camping and caravan grounds. In addition to those who stay in the village, data available from the Parish Council in its pre-consultation submissions provides evidence that Walberswick has up to 200,000 day visitors annually coming by car and bicycle and on foot. This means that the actual number of people staying in the village, and exposed to the impacts of LL construction, is many multiples higher than the census data and the preliminary population figures provided in the SR would suggest. Given that LL is breaking its own design requirements by suggesting a landing site within a residential area and within close proximity to major recreation and tourism sites, it must be required to collect correct data on human receptors beyond ONS data sources in order to get an accurate and more granular baseline. This is particularly essential for ensuring proper baseline data in areas that study impacts on human receptors including Chapters 6, 10, 14, 15 and 16. The Parish Council can assist LL in providing some of the relevant data necessary to make a more accurate assessment and analysis.

#### Chapter 6. Air Quality

We note that the SR scopes in most impacts, but the choice of language appears to downplay the potential risks. This is notable in section 6.6.9 that states: *the risks from the impact of construction dust on ecological and human receptors has been scoped into the EIA on the basis that there is potential for significant effects due to proximity of both ecological and human receptors to the proposed Onshore Scheme. However, the impacts will unlikely be significant with the implementation of suitable mitigation measures.* We believe that “lack of significance” does not reflect the reality in Walberswick given that G2 selection is contrary to LL’s statement in 6.5.3 that *“The design of proposed Onshore Scheme will seek to avoid sensitive features such as larger residential areas and ecological designations.”* As the nearest residences are a mere 5m from the landing site, and the most protected of ecological sites similarly border the landfall construction site, then LL fails in implementing its design measures making its Control Measures listed in 6.5.4 likewise insufficient. Therefore, in all its Air Quality assessments that are Scoped-In, it should be assumed that the impacts at G2 could be significant and therefore techniques for assessment must always take a precautionary approach and be at the highest possible standards and sensitivity. For example, meteorological impacts must be assessed for the actual conditions present seasonally and in relation to the impact, for example, of the common occurrence of storms and very high winds that impact the G2 site whilst not necessarily present inland.

#### Chapter 8. Ecology and Biodiversity

Given the sensitivity of the G2 landing site and parts of the cabling route, we feel that the SR is deficient in its approach to ecology and biodiversity. We set out below our chief concerns in relation to this section of the SR:

Within Chapter 8, the issue of undertaking a Habitats Regulations Assessment (HRA) is assigned two small paragraphs (8.2.2 & 8.7.20); yet crossing the Walberswick-Minsmere SPA, SAC and Ramsar sites (International Sites to which HRAs relate) is unavoidable at

the G2 landing site and terrestrial cabling route. Paragraph 8.7.20 acknowledges that Stage 2 of an HRA (Appropriate Assessment: AA) will be required. The AA could well demonstrate a likely significant effect on the International Sites that would require a derogation from the Habitats Regulations (2017) (as amended). Test 1 of the Derogation states the following:

*Test 1: Consider alternative solutions*

*To allow a derogation you must decide that there's no alternative solution that would be less damaging to the site. You should work with the proposer and consider whether any alternative solutions are available. This might include considering whether the proposal could:*

- happen at a different location*
- use different routes across a site*
- change its scale, size, design, method or timing*

As pointed out in our comments to Chapter 3, currently only two alternative solutions are put forward -- the Walberswick and the Southwold landfall sites and associated cabling routes. There are clearly other viable alternatives, such as an offshore grid, brownfield landfall, co-location of cables, etc and more information is required to be able to comparatively assess the ecological impacts of each viable alternative. To date, this evaluation has simply been presented in a cursory manner. As this will need to be properly and fully evaluated within the HRA, the absence in the SR of geographical scope and methods by which this will be done should be corrected and the methodology included.

- We note that the evidence requirements for the AA stage still needs to be agreed with Natural England under the Discretionary Advice Service (DAS) agreement to produce an Evidence Plan. Yet the SR gives no details of what this Evidence Plan may include, or when, where and how the Evidence Plan will be made available for consultation. This omission makes the scoping of the HRA within Chapter 8 woefully inadequate and this needs to be included in the SR. Specifically, it should set out how and where the Evidence Plan information will be disseminated.
- An overarching issue in this Chapter is the lack of detail on survey methods to be employed. We understand that the survey scope and design will be refined as the project advances in consultation and agreement with Natural England (per 8.2.3, 8.3.58 & 8.7.5). However, we would expect that other statutory consultees, including the parish councils, be kept informed of any decisions as they arise. The SR is inadequate in this regard and specifically how and where this information will be disseminated should be added.
- The geographical scope of LL's ecological assessment (Section 8.3) is inadequate to allow a full and satisfactory HRA/AA to be carried out. We suggest that there be a re-evaluation of the Ecological Impact Assessment (EclA) and HRA scope and that this be strengthened in the SR.

- The SR is inadequate in terms of the details on the methods and locations of surveys to allow full and proper assessment. In particular, more details need to be added to the SR for target bird species surveys (8.37, section 8.3.47), otter surveys and invertebrate surveys. If this information is not currently available, then details of specifically how and where this information will be disseminated should be added to the SR.
- The SR is incomplete in presenting the qualifying species for the SPA and Ramsar nor is this topic consistently presented throughout the SR. Species such as little tern, avocet and nightjar have been omitted in parts (Table 8-2; paragraphs 8.3.44 & 8.3.45). This omission needs to be corrected. The suite of qualifying Annex 1 species (Table 8-2) now includes woodlark as detailed in the following SPA factsheet: [https://assets.publishing.service.gov.uk/media/5dc1504be5274a4aa00642a2/Ministere-Walberswick\\_SPA\\_factsheet.pdf](https://assets.publishing.service.gov.uk/media/5dc1504be5274a4aa00642a2/Ministere-Walberswick_SPA_factsheet.pdf) This update, however, is not reflected in the SR and needs to be updated throughout with survey scope and methods adapted accordingly.
- No specific mention is made to several key rare and notable invertebrate species occurring within the Walberswick cabling route boundary (see Paras 8.3.88-8.3.92). This includes wainscot moth species group, spotted-wing antlion *Euroleon nostras*, and starlet sea anemone *Nematostella vectensis*. These species need to be scoped in as they may be affected by impacts on the water quality and levels, by trenching and tunnelling impacts, and by exacerbated coastal erosion.
- We note that artificial lighting at night (ALAN) impacts have been scoped out as LL claims that only emergency lighting will be implemented (8.54). However, given the highly sensitive nature of the G2 site and the possibility that ALAN is not properly documented in the Construction Management Plan, these impacts should be scoped-in as a precaution.
- Chapter 8 does not identify contamination or coastal erosion as being within the scope of the terrestrial ecology and biodiversity assessment. Yet trenching of the landfall section between the landfall site G2 and offshore would inevitably lead to a high risk of contamination and erosion impacts. Even where horizontal directional drilling (HDD) is implemented, we understand there are associated risks that can lead to water level disruption and surface contamination due to cracking and leakage of mud-slurry lubricating material, and possible indirect coastal erosion impacts. We are particularly concerned by the impact the proposal will have on the Annex 1 habitats and species through direct and indirect disturbance, coastal erosion and hydrological disruption potentially leading to changes to the coastal habitats, salinity and water levels, which are known to affect key protected features. We note that these issues are discussed in Chapter 18 and in a separate technical report (para 9.6.2). However, given these potential impacts could occur within the Walberswick landfall zone, they need to be addressed and scoped in at Chapter 8.



#### Chapter 10. Health and Well Being

Without repeating statements made in other sections of this response, we note that effort needs to be made to improve the baseline data and population information stated in this chapter. (see comments to Chapter 5). In addition, because the G2 site does not conform to LL design parameters in its location within the village, then the greatest level of precaution should be taken in relation to health and well-being of those impacted. Therefore, we believe that it is incorrect to scope out the disturbance or release of contamination in soil or groundwater that can result from construction activities given their potential to affect health. We believe that it is not sufficient to Scope out this impact by saying in Table 10-1 that *“best practice control measures set out in a CEMP or Outline Code of Construction Plan (CoCP) will prevent uncontrolled releases of contamination. With these measures in place, the risk of exposure to soil and groundwater contamination will be prevented and adverse health effects will be avoided.”* As the location of G2 already appears to violate best practice, then we believe that it is incumbent on LL to recognise that there is the possibility of exposure given the extraordinary closeness of residences and recreation areas. This possibility must be of overriding concern and therefore the impact must be Scoped-in.

#### Chapter 12. Hydrology, Hydrogeology and Drainage

We note that the SR does not contain any consideration of coastal flood risk and/or the effect of LL (onshore and offshore) on natural sea defences such as coastal margin habitats and saltmarsh. These features are very much prevalent in Walberswick. Moreover, as there is high probability and high potential magnitude of coastal flooding events here, this appears to be an oversight and needs to be scoped in as a likely significant effect for further assessment.

#### Chapter 14. Noise and Vibration

The siting of G2 in the heart of the village means that EIA related to impacts of Noise and Vibration need to be particularly robust. In 14.5.3, LL again states that its design measures will be such as to select sites to minimise the number of human receptors and yet, by choosing G2, LL has failed to do so. In 14.7.22, LL states that where residential receptors are identified within 1000m of any new noise sources, an assessment will be undertaken in line with BS 4142. It should be noted that the entire village of Walberswick is within this distance from the landing site including all shopping, pubs, village hall, residences, village green, playgrounds and summer camp, playing fields, PRoWs and heavily used beaches.

Section 14.3.3 suggests that a study area of 300m around the Onshore Scoping Boundary is necessary to assess construction noise impacts based on precedent from other projects and the limitations of prediction methods beyond this distance as noted in the British Standard BS5228. As above, it should be noted that Walberswick’s main shop, pubs, residences including listed buildings, beaches and PRoW easily fall within this boundary.

Finally, for potential construction vibration impacts, the SR states that an area of 100m is considered to be sufficient to assess potential construction vibration impacts. Because of the inappropriateness of the G2 landing site and the early stages of the cable route, 100m

takes in, among others, a large number of homes within the Conservation Area, the main village shops and holiday lets, all of which will be directly susceptible during construction and recovery and must be studied to assess impact and mitigation.

#### Chapter 15. Transport and Traffic

This chapter is particularly lacking in candour in relation to the constraints of the Walberswick G2 site and cabling route and therefore has erroneously scoped out some essential elements. Specifically, LL states in 15.4.2 that adverse impacts could arise from inter alia: *“increased traffic volumes and congestion due to construction traffic; abnormal load deliveries and temporary diversion of traffic due to road closures/diversions.”* In 15.5.4, it states that *“where road closures are required, the period of the closure would be kept to a minimum and diversions would be via the most appropriate alternative route. Access to properties would be maintained at all times.”*

However, the SR fails to note and address that Walberswick is only accessible by vehicle via a single road. Therefore, LL cannot keep the commitments it makes in 15.5.4. Whilst Table 15.2 scopes in the effect of construction traffic on road users and the general public arising from construction, it has incorrectly scoped out the impact of closures/diversions for abnormal load access or other incidents that would close the road. LL cannot scope out these impacts by claiming that they will occur in off peak times or that alternatives will be made available. The fact is that there are no alternative routes to Walberswick and therefore any closure, at any time of the day, planned or unplanned, will deny access to emergency services and deliveries and would potentially deny residents access to their homes and/or visitors ability to leave. Given this extremely precarious and dangerous situation, all impacts related to potential road closures must be Scoped-In for G2 and evidence provided for safe mitigation.

#### Chapter 16. Socioeconomics, recreation and tourism

The approaches proposed in this chapter are some of the weakest in the SR and are particularly inappropriate to the proper assessment of the Walberswick G2 proposal. The weakness in the proposed assessments appears connected to LL's failure to properly identify G2 not only within a village, but within a village whose economy is nearly entirely based on nature-based tourism around its beautiful natural beach, extensive walking trails, pristine landscapes and wildlife, quaint village life and beautiful views. In fact, PRoWs at the G2 site are particularly prized as they provide the best viewing points for the largest continuous stand of reedbeds in England and Wales (part of the Minsmere-Walberswick Ramsar site).

We have attempted below to point out the most critical shortcomings that need to be addressed:

- 16.3.10 improperly fails to recognise socioeconomic recreation and tourist (SRT) assets that fall easily within 500m of the landfall site and cabling route. These include tourism and recreation-based businesses, visitor attractions, playground, heritage assets, beaches and PRoWs. These need to be included and factored in assessment of SRT impact.
- Table 16-5 has left out several important community facilities for Walberswick including the Village Hall, the Walberswick Beach, PRoWs, and camping sites. This oversight needs to be corrected and factored into assessment of SRT impact.

- Table 16-8 scopes out the effect of construction on residential property (both direct and indirect). This is clearly incorrect given that G2 is surrounded by homes within 5m of the site. Similarly, it is wrong to scope out the effect of construction on tourist accommodation and businesses because of the exceptionally close proximity (for example within the 100m and 500m buffers) of accommodation and natural attractions. Therefore the SR should be amended to Scope-IN these impacts.
- The impact on tourist accommodation of construction workforce has been scoped out on the argument that workers will come from nearby. That is not at all likely given the low unemployment in the area, the competing energy projects including Sizewell C and the generally older demographic of the area. Therefore, this impact should be scoped in for the LL proposal as a whole.
- Given these and other shortcomings in the quality of the SR in relation to SRT, it is incorrect for LL to suggest in 16.7.1-3d that it can adequately assess impacts based on desk studies. Given the inaccuracy of its information in the SR pointed out above and the very significant potential for the scheme to produce negative effects, the assessment needs to make use of surveys, interviews and other bespoke means to properly baseline, assess and mitigate.

### Conclusion

In summary, among other shortcomings, we believe that the selection of the G2 site makes it impossible for LL to meet the standards and commitments it has set out in the SR. This argues for ensuring that LL proceeds with the utmost precaution by maximising throughout the EIA what is “Scoped In” and, in full acknowledgement of the inappropriateness of the Walberswick site, fully investigates, analyses, justifies, and demonstrates the ability to mitigate the impacts of its proposal.

*31 March 2024*

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**From:** Peter Langford [REDACTED]  
**Sent:** 23 March 2024 21:10  
**To:** Lionlink Interconnector  
**Cc:** Donnachie Ann (parishclerkwesthall@gmail.com)  
**Subject:** LIONLINK CONNECTOR

You don't often get email from [REDACTED]

[Dear Planning Inspectorate](#)

[Please confirm that you have received the following comments from Westhall Parish Council:](#)

The LionLink Environmental Impact Assessment (EIA) Scoping Report and attached Annexes is a complex document with 770 pages in the main report and some of the details require technical knowledge to understand. It is beyond the scope and ability of a small Parish Council to review all the documentation, so we have focused on the proposed HVDC underground cabling routes and associated works that is likely to impact our rural community most.

The co-ordination and colocation opportunities with other infrastructure projects has not been properly considered. The Parish Council would like the other suitable landfall options (eg Aldeburgh / Thorpeness with Sea Link) to be re-examined to minimise the onshore environmental impacts. While there are undoubted offshore impacts associated with subsea cabling, using shared underground cable routes from landfall to the Converter Station and Substation is less destructive to the onshore environment and would minimise the inconvenience to local communities. It would significantly reduce the onshore cable route, preclude the complexities of cross the A12 and River Blyth and avoid large swathes of the environmentally sensitive Suffolk Coast and Heath Area of Outstanding Natural Beauty.

The Scoping Report uses a baseline transport network and transport data to consider the impacts to the project and local communities in the vicinity of the HVDC cable routes. These calculations do not consider the construction traffic generated by the other NSIP projects which overlap the LionLink construction period, most notably Sizewell C. A realistic assessment of the public road network suitable for access by HGVs and the Abnormal Indivisible Loads (AILs) must take account of the increased volume of similar traffic, the loads required by the other NSIPs and the holiday traffic that uses the constrained road network to Southwold or Walberswich. .

[Regards](#)

[Peter Langford](#)  
[Vice Chair](#)  
[Westhall Parish Council](#)