

# Sea Link

## Volume 5: Consultation Report

Document 5.1.9 Appendix H Pre-submission Engagement Part 3 of 3

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## **4. Additional Preliminary Heritage Information – Design Amendments in Suffolk**





**The Great Grid Upgrade**

Sea Link

# Additional preliminary heritage information – design amendments in Suffolk

Version A

November 2024

national**grid**

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# Sea Link

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## 1.1 Introduction

- 1.1.1 This technical note presents a preliminary assessment of the potential impacts to cultural heritage resulting from the proposed permanent access and bridge crossing the River Fromus required as part of Sea Link (hereafter referred to as the 'Proposed Project'). It considers the design change in this location introduced since the targeted consultation in July 2024 and whether there is the potential for any additional or different likely significant effects as a result.
- 1.1.2 The concluding section also addresses any other design changes since targeted consultation in July 2024 and includes a statement on the potential for any other additional or different likely significant effects.

## 1.2 Background

- 1.2.1 Works undertaken to date to inform the cultural heritage assessment have included geophysical survey, with evaluation trenching due to commence in winter 2024. While some features have been identified through geophysical survey, they were not extensive, and evaluation trenching in adjacent fields has suggested remains identified through trenching largely match the features recorded in the geophysical survey.
- 1.2.2 As a result, the potential for previously recorded archaeological remains in the areas of the proposed permanent access and bridge crossing the River Fromus is considered to be low. It is assumed that physical impacts to any buried remains can be mitigated through standard measures such as full excavation or strip, map, and record. Therefore, this technical note focuses on the potential for impacts through change to the setting of heritage assets.
- 1.2.3 The setting assessment undertaken as part of the Environmental Impact Assessment (EIA) has taken a study area of 2km from the above ground infrastructure (the Study Area) which includes the River Fromus crossing as well as the Converter Station. A number of designated assets were identified within this Study Area, with the assets most likely to suffer a significant adverse effect on setting as a result of the River Fromus crossing being Saxmundham Conservation Area, the Grade II\* St John the Baptist Church (NHLE 1268184), and the Grade II listed Hurts Hall (NHLE1268178) which are located to the north of the proposed permanent access and bridge crossing the River Fromus. These assets are discussed in more detail below.

### Saxmundham Conservation Area and the Grade II\* St John the Baptist Church (NHLE1268184)

- 1.2.4 The majority of the designated assets recorded in the Study Area are located within the settlement of Saxmundham, a Conservation Area located at the western end of the Proposed Project, to the north of the proposed River Fromus crossing. Archaeological excavations in the town have recovered evidence of activity from the prehistoric period onwards, although the settlement probably had its origins in the early medieval period and continued to develop as a key market town in the medieval period.
- 1.2.5 The setting of the settlement is key to its understanding and significance, with the Conservation Area Appraisal highlighting elements such as the former parkland associated with Hurts Hall through which the proposed permanent access and bridge crossing the River Fromus are located (East Suffolk Council, 2016). While this parkland has been degraded as a result of its conversion to arable land, its rural nature is highlighted as key to understanding the settlement when approaching from the south.

- 1.2.6 The Conservation Area is considered to be of Medium Value. The value largely derives from the architectural and historic interest.
- 1.2.7 While most assets within the Conservation Area are screened from the Saxmundham Converter Station by the topography as well as the built environment, with most key views also not being impacted by the Proposed Project, both the proposed permanent access and the bridge crossing the River Fromus have the potential to result in impacts on the Conservation Area. This is a result of the introduction of the bridge, and to a lesser degree the permanent access, which will impact on key views to the town from the south. These key views include the Grade II\* listed church and the Grade II listed Hurts Hall. The proposed permanent access and bridge crossing the River Fromus have the potential to reduce the prominence of these assets when viewed from the south. They also have the potential to alter the rural character of the area which is highlighted in the Conservation Area Appraisal.

#### **Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)**

- 1.2.8 The Grade II listed Hurts Hall is located on the southern edge of Saxmundham, and approximately 200 m north of the Order Limits for the Proposed Project, and 250m north of the proposed alignment of the permanent access. Recorded from at least the 18th century, the current hall (designed T. W. Cotman (The Suffolk and Essex Free Press, 1890)) was built in the late 19th century after the previous hall (by Samuel Wyatt) was destroyed by fire in 1899. The hall underwent various alterations in the 20th century, and was used as the Major General Sir Percy Hobarts headquarters during the Second World War when he was developing the specialist vehicles, or 'Hobarts Funnies' that were key to the success of the D-Day landings. During this period, the area known as 'The Layers' to the southwest was used to billet men, while Churchill, Montgomery, and Eisenhower visited Hurts Hall to approved plans for D-Day. The hall was sold in the opening years of the 21st century, and is now separated from the parkland as a result of the different ownership. The house was subject to an extensive programme of restoration in the 21st century after being taken over by the current owner.
- 1.2.9 The hall is set within formal gardens, which were re-established as part of the 21st century restoration, and a wider parkland. Both the inner formal gardens and wider parkland are not designated, and the wider parkland is much degraded. This is largely a result of the removal of field boundaries and trees to create large open arable fields – a significant change from the landscape of smaller mixed arable and pasture fields recorded on the historic mapping of the 19th century.
- 1.2.10 Most of the former Hurts Hall parkland lies within the area defined as 'Peripheral Area SX2' in the Suffolk Settlement Sensitivity Assessment (Alison Farmer Associates, 2018). This assessment notes that hedgerows have been lost in the parkland, and identifies the reinstatement of hedgerows and replanting of parkland trees as a way to enhance the character of the area and the approach to the town.
- 1.2.11 Hurts Hall represents a key building on the southern side of Saxmundham, and while it lies outside of the Conservation Area, the Conservation Area Appraisal notes that the setting of the Conservation Area is much enhanced by the Hurts Hall parkland which provides "attractive rural character before entering the density of the town" (East Suffolk Council, 2016). The Conservation Area Appraisal also notes the importance of views towards both Hurts Hall and the Grade II\* listed Church of St John the Baptist (NHLE1268184) which is located to the north of the Hurts Hall, from the B1121 to the

south. The church is linked to the hall by a private track, while the main access to the hall is via a driveway that starts at the southern edge of the town.

- 1.2.12 The importance of views from the B1121 of Hurts Hall, the relict parkland that surrounds it, and the church, are also highlighted by the recently adopted Saxmundham Neighbourhood Plan (East Suffolk Council, 2023). This document also notes the importance of views from landscape known as The Layers, on the western side of the B1121, towards Hurts Hall recognising that the woodland on the ridge to the east of Hurts Hall which provides a marked contrast to the open landscape of the Fromus Valley. Both views are considered key and Policy SAX12 of the Saxmundham Neighbourhood Plan states that “developments, which would have an unacceptable adverse impact on the landscape character of the view concerned, will not be supported”.
- 1.2.13 Views from Hurts Hall are also considered to contribute to its significance, with stakeholders including East Suffolk Council highlighting the importance of views south from the hall during stakeholder engagement. The southwest-northeast alignment of the hall mean that views from the main elevation of the hall are to the southeast and therefore angled away from the proposed bridge. Views from ground level are further limited as a result of planting associated with the inner formal gardens. However, the hall does have a two-storey corner bay on the southwest corner which would provide views to the south and west.
- 1.2.14 As a Grade II listed building, Hurts Hall is considered to be of Medium Value, and this value largely stems from its architectural and historic interest derived from the information it contains associated with post-medieval development of Saxmundham as well as the hall and associated estate. While the parkland is associated with the hall, it is much degraded due to a loss of hedgerows that have resulted in it being opened up to form large arable fields. As such the parkland is considered to be of local importance and therefore of Low Value.
- 1.2.15 While Hurts Hall and the inner formal gardens are located to the north of the Proposed Project, the Order Limits pass through the wider parkland, and the construction of the proposed permanent access and bridge crossing the River Fromus have the potential to result in physical impacts on the parkland as well as impact on the setting of the parkland and Hurts Hall. As with the Saxmundham Conservation Area discussed above, the introduction of the bridge as well as the permanent access, also have the potential to result in impacts on the setting of Hurts Hall. This includes impacts on the views out from the hall, as well as impacts as a result of the introduction of new infrastructure on views into the hall from the south.
- 1.2.16 Site visits, as well as the Zone of Theoretical Visibility (ZTV), have confirmed that there will be no views of the proposed Saxmundham Converter Station from the ground level of Hurts Hall, and it is assumed that views from the upper floors will also be limited. This is largely a result of topography and existing woodland.

## **1.3 Summary and conclusions in terms of significant effects**

- 1.3.1 The classification and discussion of significant effects in this section follows the methodology adopted for the assessment provided in the Preliminary Environmental Information Report (October 2023).

## Proposed permanent access and bridge crossing the River Fromus

- 1.3.2 The repositioning of the crossing of the River Fromus to a location further north has the potential to bring the bridge and permanent access closer to Hurts Hall as well as the Saxmundham Conservation Area. This will result in the two Proposed Project elements (i.e. the permanent access track and the bridge across the River Fromus) becoming both more prominent in key views of the Conservation Area, the Grade II\* St John the Baptist Church, and the Grade II Hurts Hall from the south, as well as placing them closer to Hurts Hall thereby impacting on views from the hall.
- 1.3.3 In relation to Saxmundham Conservation Area, an asset of Medium value, these changes would not result in a significant adverse effect. However, based on current information the changes are expected to result in a significant adverse effect on the Grade II\* St John the Baptist, an asset of High value. In relation to Hurts Hall, an asset of Medium value, these changes are also expected to result in a significant adverse effect on this asset. Whilst these impacts may be minimised through mitigation such as the final design and appearance of the bridge or screening provided by planting, at this stage it is expected the mitigation is unlikely to reduce the residual significance of effect to a level which is considered to be not significant adverse in EIA terms. This is a preliminary assessment of likely significant effects which will be revisited in the Environmental Statement once visualisations of the bridge crossing the River Fromus and the proposed landscape planting are available.
- 1.3.4 There is no direct correlation between the significance of effect as reported in EIA, and the level of harm caused to heritage significance, as defined in the Overarching National Policy Statement for Energy (NPS-EN1). While a residual adverse significant effect in EIA terms is predicted to Hurts Hall and the Church of St John the Baptist, this will not result in 'Substantial Harm', in NPS-EN1 terms, to these assets. Planning Practice Guidance (MHCLG 2019) notes that:
- "In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting."*
- 1.3.5 As such, while the proposed permanent access and bridge crossing the River Fromus would potentially result in a significant adverse effect, it would not seriously affect a key element of the special architectural or historic interest of Hurts Hall or the Church of St John the Baptist and would therefore not result in 'Substantial Harm'. It is considered that the level of harm to both assets, and the Saxmundham Conservation Area, would be 'less than substantial'.
- 1.3.6 'Less than substantial' harm is a broad category that can range from almost no harm, at the lower end of the scale, to just below 'substantial harm' at the higher end of the scale. Planning Practice Guidance (MHCLG 2019) states that the extent of harm may vary and should be clearly articulated. At this stage of the assessment process, there is uncertainty regarding the final design of the proposed bridge and the associated landscape screening design for the bridge and permanent access. Visualisations of the proposed bridge and permanent access in the context of the conservation area, church and hall are also in production to assist with the assessment of this impact. For this reason, it is not possible at this stage to fully articulate where the level of harm would sit within the range of 'less than substantial harm', however it is possible to state that it is not considered to be at the high end of the range.



## Other design changes since the targeted consultation in July 2024

- 1.3.7 One of the other design changes introduced since the targeted consultation in July 2024 has the potential to result in an additional significant adverse effect if unmitigated. This is associated with the expansion of the area that could be used as a construction compound at the Saxmundham Converter Station site in Suffolk.
- 1.3.8 All of this area was included in the draft Order Limits for the Proposed Project at the statutory consultation stage and is considered in the Preliminary Environmental Information Report (October 2023). Since that time, works to inform the heritage assessment have been undertaken, and the results of geophysical survey and evaluation trenching have highlighted potential areas of complex archaeology in this area. These remains, which include Bronze Age burials as well as field systems including enclosures, trackways, and possible structures dating to the medieval period, are considered to be of Medium value from an assessment perspective. Taking a worst-case approach that the proposed temporary construction compound could be constructed anywhere within this area means that a large proportion of these remains could be lost as a result of establishing a temporary compound in this location. This has the potential to result in a significant adverse effect. Assuming that the remains cannot be avoided, mitigation should be possible through standard measures such as full excavation or strip, map, and record. With mitigation in place the residual effect should reduce to a level which is not considered significant. This will all be reported on within the Environmental Statement in the Cultural Heritage chapter for the Suffolk Onshore Scheme.
- 1.3.9 No other significant adverse effects are introduced as a result of any other design changes made since the targeted consultation in July 2024. The conclusions of the Additional Preliminary Environmental Information (July 2024) and the Preliminary Environmental Information Report (October 2023) otherwise remain the same.

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## **5. Summary of Design Amendment Following Targeted Consultation**





**The Great Grid Upgrade**

Sea Link

# Summary of design ammendment following Targeted Consultation

Version A

November 2024

**nationalgrid**



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# Sea Link

## Document control

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Organisation	National Grid		
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Data Classification	Public		

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Date	Version	Status	Description / Changes
22/11/2024	A	FINAL	

## 1.1 Introduction

- 1.1.1 We undertook statutory consultation between 24 October and 18 December 2023. Following review of the feedback received, a series of refinements were made to the Project proposals. Further feedback was sought on these design changes during a period of targeted consultation, which took place between 08 July and 11 August 2024.
- 1.1.2 We are intending to submit our application for development consent in early 2025. In advance of this, we have made a number of further amendments to the design, reflecting feedback received during both rounds of consultation as well as from ongoing assessment work.
- 1.1.3 These further amendments to the proposed development are not material or substantial changes to the proposed application. They do not materially change the effects or fundamentally change the project as a whole. We would like to take this opportunity to update you on our plans..

## 1.2 Suffolk

### Fromus crossing

- 1.2.1 We have realigned and rotated the proposed crossing of the River Fromus, to avoid valuable trees on the eastern bank. This moves the bridge approximately 40m further north along the river.
- 1.2.2 As before, we are proposing a bridge that is approximately 6m high from riverbank to parapet level, with approach ramps of approximately 80m, as well as an alternative smaller version that is approximately 4m high (which would be our preferred option, subject to the outcome of discussions with key environmental stakeholders). The final design of the bridge would be confirmed at later stages, but we are working with architects, the local planning authorities, and the local design review panel to agree designs for a bridge crossing that adopts an architectural approach that is sensitive to its setting. The onward access road towards the converter station has been slightly realigned.
- 1.2.3 Realigning the proposed bridge brings it closer to the southern part of Saxmundham, meaning that the bridge and associated access track would become more prominent in key views of the Conservation Area and the Grade II\* Church of St John the Baptist Church from the south. They also get closer to the Grade II listed Hurts Hall, potentially impacting on views from the hall.
- 1.2.4 Impacts on these heritage assets may be reduced through mitigation, such as the final design and appearance of the bridge or screening provided by planting, although the proposed bridge is likely to result in significant adverse effects on the setting of the Church of St John the Baptist and Hurts Hall. However, the proposed changes will not result in substantial harm – the level of harm would be less than substantial in policy terms. This is because the proposed changes would not seriously affect any key elements of the special architectural or historic interest of Hurts Hall or the Church of St John the Baptist.
- 1.2.5 Ongoing assessment work and design of the bridge itself will confirm any impacts and inform any mitigation.



## Construction & maintenance compounds

- 1.2.6 We have reintroduced areas adjacent to the proposed converter station to provide more flexibility on where we can locate the necessary construction compound.
- 1.2.7 This reflects ongoing discussions around how we are coordinating with National Grid Ventures regarding their proposed interconnector projects. By including flexibility in where we can put our construction compound, we are allowing National Grid Ventures more time to consider where to locate their own converter station within the wider site. By giving Sea Link flexibility, we are giving NGV more flexibility and greater opportunity to effectively site their own converter station and construction area, as part a coordinated wider site. Views have already been sought on this wider more flexible area for construction compound locations during our statutory consultation in late 2023.
- 1.2.8 The design of the construction & maintenance compounds is not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously.

## Mitigation and enhancement land

- 1.2.9 We have moved, introduced, or refined areas of land proposed for ecological mitigation and/or enhancement, following feedback from key stakeholders.
- 1.2.10 We have moved an area of proposed temporary mitigation from where it was shown at targeted consultation (off the A1094, within the National Landscape area) to a nearby site on the other side of the road (including proposed access improvements, if necessary). This is because the baseline ecological condition of the new site is considered to provide a better opportunity for delivering this temporary mitigation, which involves managing it as acid grassland for ten years. We have also introduced an additional area of arable farmland close to Saxmundham, where it is proposed to adapt existing farming practice to include 'skylark plots'. These are unsown areas within arable crops which provide skylarks with access to nesting habitats throughout their breeding season. Finally, we have refined areas of land along the River Fromus to better reflect the opportunities for the delivery of ecological enhancement, removing certain areas which are not required for mitigation, and where managing and maintaining habitats may be difficult and deliver fewer public benefits
- 1.2.11 The approach to mitigation land is not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in the preliminary environmental information provided previously

## Other changes

- 1.2.12 Various other adjustments are proposed to the design, including access routes and underground cable alignments.
- 1.2.13 Other adjustments include introducing more flexibility for routing the Friston substation access road, and new and relocated monitoring accesses off the B1119 to potential joint bay locations. Other changes include introducing more flexibility for routing the underground cables into Friston substation, to allow us to better coordinate final routing with future projects so as to retain the effectiveness of the proposed landscape planting. We are introducing more flexibility for routing the underground cables within an area east of Friston to allow us to avoid buried archaeology, should that be necessary.

- 1.2.14 These other changes are not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously

## 1.3 Kent

### Construction & maintenance compounds & methodologies

- 1.3.1 We have removed or moved various construction compound areas.
- 1.3.2 A construction compound is no longer proposed on the former hoverport. The hoverport shall remain as part of the proposals only as part of the construction & maintenance phase access route from Sandwich Road to the mudflats. Flexibility on where the access may be routed across the hoverport is included, to allow sensitive flora to be avoided more easily (if necessary). Furthermore, we have removed the maintenance compound immediately adjacent to Sandwich Road and moved this to a nearby location on the north side of the road, closer to the A299 (this compound will now also be used during the construction phase).
- 1.3.3 We have removed the larger construction compound area west of the A256 to reduce archaeological impacts. We have instead reintroduced smaller compound areas elsewhere. This includes reintroducing a construction compound north of the converter station site, and introducing a compound to the east of the converter station. Both areas were shown as being within the project for construction works during our statutory consultation in late 2023.
- 1.3.4 Finally, we are also including the possibility of taking our marine cable further inland, west of the A256, and have enlarged the compound area in this location to accommodate this. If feasible, this would avoid the need for a construction compound in the field to the east of the A256.
- 1.3.5 Any new construction traffic caused by the use of the Sandwich Road compound during the construction phase would be managed through management plans and a travel plan. The changes to construction and maintenance compounds are not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously.

### Mitigation and enhancement land

- 1.3.6 We have moved an area of land proposed for ecological mitigation.
- 1.3.7 We have removed an area of land previously shown to the south of the existing overhead line, which was included to provide additional foraging habitat for birds moving inland from Pegwell Bay. This has been replaced with another area of land immediately to the west of the A256 further south, but rather than create habitat in the way previously proposed, the strategy will now be to adapt existing farming practices on these arable fields in a way that is beneficial to important bird species. This change follows ongoing discussion with and advice from key stakeholders including Natural England.

- 1.3.8 The approach to mitigation land is not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously.

## Other changes

- 1.3.9 Various other adjustments are proposed to the design, including access routes and underground cable alignments.
- 1.3.10 Other adjustments include introducing adjustments to access and drainage routes in the field off Ebbsfleet lane, to avoid other utilities and to reduce impacts on sensitive archaeology, and adjustments to the underground cable route west of the A256, again to reduce impacts on sensitive archaeology.
- 1.3.11 These other changes are not expected to result in materially different environmental effects to those already reported and consulted on during previous consultations and in preliminary environmental information provided previously

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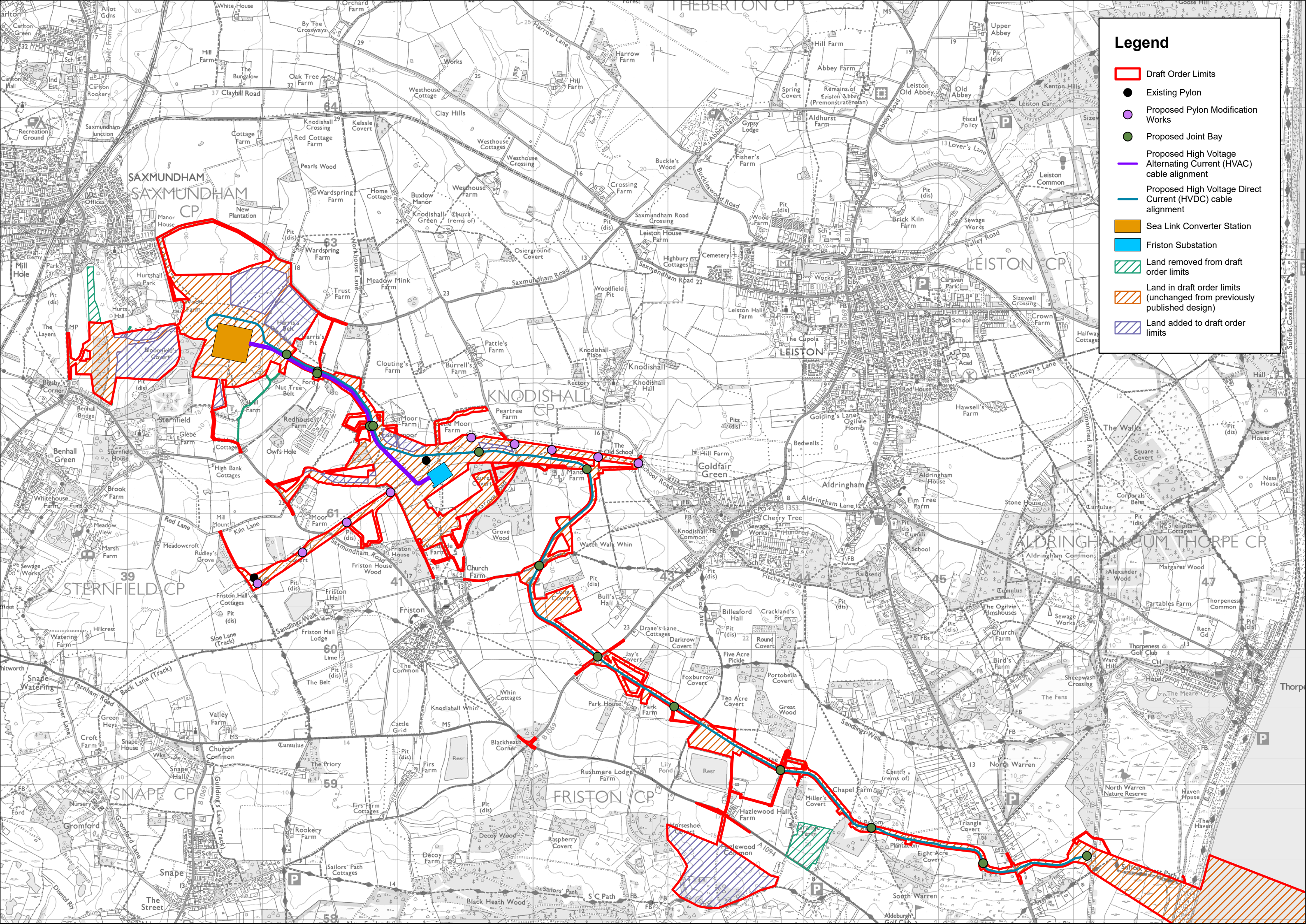
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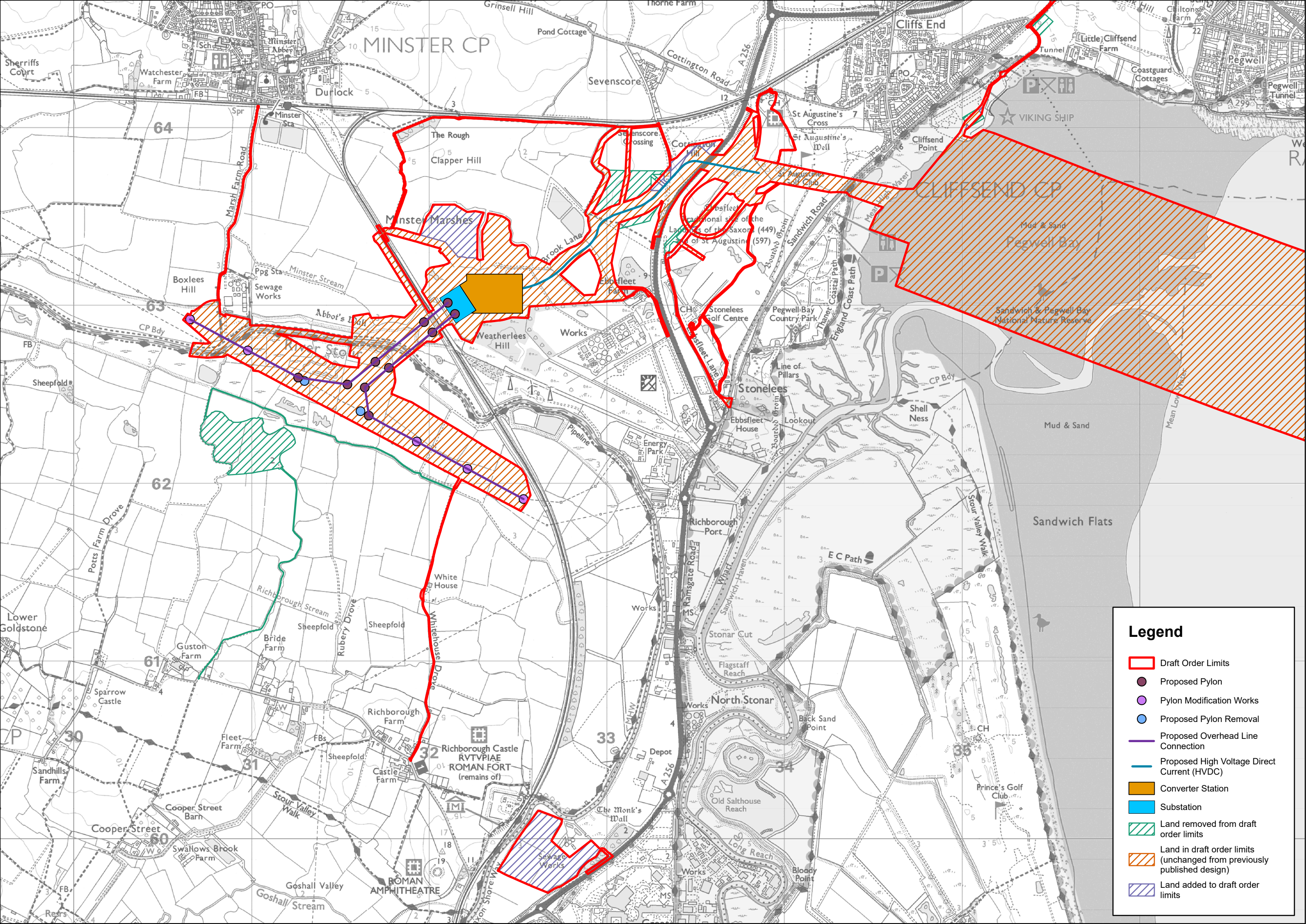


# 6. Maps and Plans









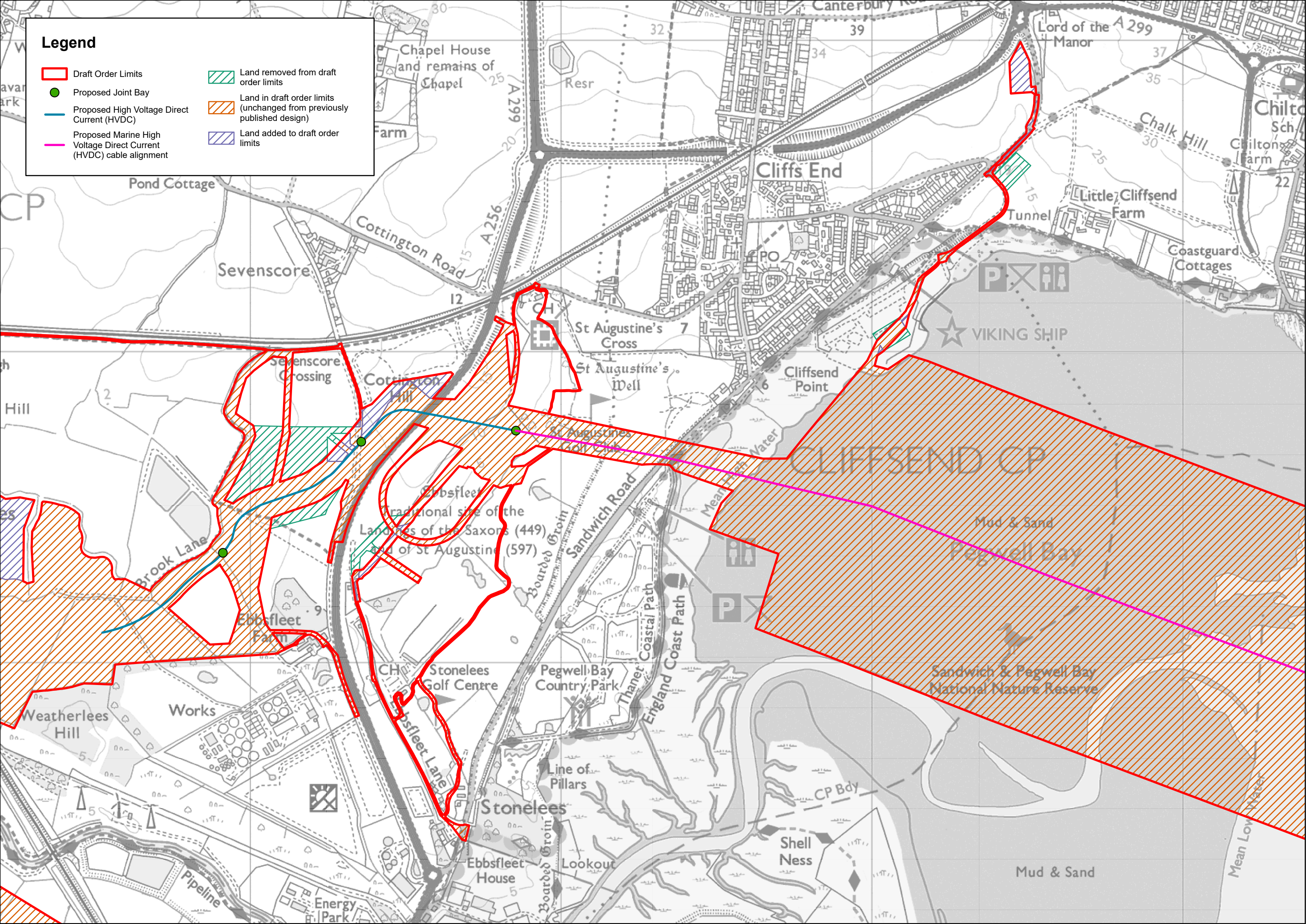
### Legend

- Draft Order Limits
- Proposed Pylon
- Pylon Modification Works
- Proposed Pylon Removal
- Proposed Overhead Line Connection
- Proposed High Voltage Direct Current (HVDC)
- Converter Station
- Substation
- Land removed from draft order limits
- Land in draft order limits (unchanged from previously published design)
- Land added to draft order limits



## Legend

-  Draft Order Limits
-  Proposed Joint Bay
-  Proposed High Voltage Direct Current (HVDC)
-  Proposed Marine High Voltage Direct Current (HVDC) cable alignment
-  Land removed from draft order limits
-  Land in draft order limits (unchanged from previously published design)
-  Land added to draft order limits



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