



Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the SeaLink Project.

East Suffolk Council – Principal Areas of Disagreement Summary Statement (PADSS)

Application Reference: EN020026

East Suffolk Council IP Reference: FA3A16664

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Application by National Grid Electricity Transmission (NGET) for an
Order Granting Development Consent for the SeaLink Project – East
Suffolk Council’s Principal Areas of Disagreement Summary
Statement (PADSS)

1. Purpose of this Principal Areas of Disagreement Summary Statement

- 1.1 This submission has been prepared in response to a letter issued by the Examining Authority (ExA) under s89(3) of the Planning Act 2008, dated 8 July 2025 (the s89(3) Letter).
- 1.2 The letter detailed the ExA’s “procedural decision to request from each named local authority, Marine Management Organisation and the Environment Agency a principal areas of disagreement summary statement (PADSS).”
- 1.3 East Suffolk Council (ESC) notes the additional requests from the ExA in the s89(3) Letter which requested the PADSS to be provided in a table format, addressing, for each area of disagreement:
 - the principal issue in question;
 - a brief explanation of the concerns held by the party which they will report on in full in their Local Impact Report/ Written Representation;
 - on a without prejudice basis what, in that party’s view, needs to change/ be amended/ included so as to overcome the disagreement; and
 - in the opinion of that party, the likelihood of the concern being addressed during the examination stage.
- 1.4 To assist the ExA, ESC has prepared its PADSS in line with the above requirements, and using the sample table provided in Annex A of the s89(3) Letter.

2. Principal Areas of Disagreement Summary Statement (PADSS) Table

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
Topic 1 – Need Case				
1.01	Need for the Project	<p>The Project is said to be required to transfer energy between Suffolk and Kent. However, the need for the project only arises when and if Sizewell C and LionLink are operational, and the latter is not even submitted let alone consented. It is the view of ESC that the need for the alleged reinforcement has not yet been made and is certainly not yet required in the timescale as currently proposed by the applicants. It follows that should the above identified projects not be consented or if consented, not become operational at the times anticipated or indeed not be delivered at all, then such a scenario would fundamentally change the need for SeaLink.</p> <p>Considering the above, it remains the position of ESC that this application is premature and even if the Project is consented, its implementation should be conditional upon the other two projects being committed in terms of formal consent and commencement. This remains ESC's position despite the recent Final Investment Decision for Sizewell C.</p>	<p>ESC and the Applicant fundamentally disagree on the need case presented for SeaLink for the reasons previously stated (in Sections 3 and 4 of ESC's submitted Relevant Representation).</p> <p>ESC objects to the SeaLink project in view of the detrimental immediate and long-term impacts that will arise and thereby be imposed upon the local communities who will be compelled to host, and neighbour, the Project's onshore infrastructure. It is apparent that the SeaLink project will result in yet further- in combination with other already consented projects and alone - unacceptable harm to the local communities, the natural environment and economy of East Suffolk over and above the other numerous infrastructure projects that have already been forced upon the local community. It is not yet considered that the timing of the need for the Project has been robustly proven. The operation of Sizewell C is potentially at least 10 years away, and throughout the pre-application stage, ESC</p>	Low

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			<p>has requested the further consideration of alternative offshore solutions.</p> <p>The approach adopted by NGET to date is based on an assumption that as Sealink has been identified as an Accelerated Strategic Transmission Investment (ASTI) project, it can be delivered at any cost – both monetarily and without regard to the damage that will be caused to the local community and the area by the Project. This is not the case. Agreement on need is therefore unlikely to be reached.</p>	
Topic 2 – Benhall Railway Bridge, B1121				
2.01	The use of Benhall Railway Bridge on the B1121 for access to the converter station site, including construction of an overbridge.	Concerns about the proposed use of the bridge for access to the converter station site. The bridge has a weight restriction of approximately 46 tonnes, and so the Applicant is proposing to construct an overbridge for Abnormal Indivisible Load (AIL) movements. ESC defers to Suffolk County Council (SCC) as Highways Authority and supports their concerns.	ESC defers to SCC but will expect to be fully consulted on this element on the Project considering the genuine concerns of the local community as well as the practicality.	ESC defers to SCC's judgement regarding the likelihood of resolution – subject to the caveat sounded.
Topic 3 – River Fromus Crossing				
3.01	Heritage impacts	ESC has concerns regarding the harm that the converter station and the access over the River Fromus will cause to the significance of designated heritage assets which surround the site, due to the impact of the development on their setting. In particular, Grade II listed Hurts	To be determined over the course of examination but as currently proposed, this aspect of the scheme is unacceptable.	Unknown.

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		<p>Hall and Hill Farmhouse, as well as the Saxmundham Conservation Area and Grade II* Church of St John the Baptist would be impacted through the changes in their settings.</p> <p>The movement of the River Fromus Crossing 40m north along the river will make it more prominent in views towards these heritage assets, and the Saxmundham Conservation Area. The mitigation planting around the bridge and access where there are currently open views towards those assets may obstruct these views and affect their significance.</p>		
3.02	Design	The need for the DCO to include an appropriate consenting mechanism to secure the most appropriate bridge design, including genuine engagement with key stakeholders.	ESC requires that comprehensive and detailed provision is included within the DCO to ensure that the proposed Fromus Bridge design is submitted to and approved by ESC's Design team (in consultation with relevant stakeholders such as the relevant Highways Authority) before any works on the bridge can be commenced.	Likely
3.03	Landscape and visual impacts	The removal of vegetation to facilitate the construction of the bridge will open up views toward the converter station site and increase the focus towards this activity. These impacts have been exacerbated by the increase in scale of the bridge proposed in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. This	Whilst ESC appreciates the need for compliance with the Water Framework Directive, ESC requires that the scale of the bridge is minimised to mitigate landscape and visual impacts within the landscape character area, as well as reducing impacts introduced on nearby heritage assets.	Unknown.

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		construction activity would be within a parkland landscape, which is of a special quality and a feature of the Fromus Valley Landscape Character Area.		
3.04	Assessment of trees and hedgerows near the River Fromus Crossing	<p>A new edition of BS 5837 Trees in Relation to Design, Demolition and Construction is due to be published in the near future (at the time of writing (August 2025) the new BS has not been published – this is expected in 2025 following the earlier consultation which closed in October 2024). This has significantly greater protection recommendations for Veteran and Ancient trees, and could create a potentially unsurmountable constraint for the Crossing. Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. This will be particularly relevant to the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point and which the Council considers may have been under assessed in terms of its cumulative stem diameter, given its multi-stemmed layered form.</p> <p>ESC will expect all tree survey information to be re-submitted according to the new guidance.</p>	Following publication of the new BS (which is expected during the examination period), ESC will expect all tree survey information to be re-submitted in compliance with the new guidance. Only once this information has been provided can an appropriate course of action be established.	Unknown

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		It should be noted that prior to submission, ESC had not seen any detailed tree survey and Arboricultural Impact Assessment information, including what other important trees could be lost as a result of efforts to avoid the Horse Chestnut.		
3.05	Impacts on woodland vegetation	The removal of the mature woodland vegetation along a section of the River Fromus will alter the vegetation network. There are significant concerns in the community – which are shared by ESC - about the potential loss of veteran trees and ancient woodland.	To be determined over the course of examination.	Unknown.
3.06	Assessment of alternative access options for the converter station site	The proposed Fromus crossing on the currently proposed western access route remains a concern for ESC as it will require significant intrusive engineering and design work. ESC considers that robust justification is required for ruling out the alternative accesses, but this has not yet been provided by the Applicant.	Applicant to provide an options appraisal report detailing the alternative options for access to the converter station site that were considered, and justification for selection of the western River Fromus Crossing as the preferred access into the co-located converter station site.	Unknown.
Topic 4 – Saxmundham Converter Station				
4.01	Surface water drainage and flood risk	It is essential that surface water drainage and flood risk at the site is comprehensively and appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. The Order Limits must be sized appropriately to accommodate the	ESC defers to SCC as Lead Local Flood Authority, but supports their concerns.	ESC defers to SCC's judgement regarding the likelihood of resolution

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		drainage solution for the site during both construction and operation, and the ExA should satisfy themselves that this is indeed the case.		
4.02	Operational noise	<p>The Applicant has stated that noise rating levels at the converter station should not exceed 35 dBA L_rT_r. For context in relation to this 35 dB value, if adopted this would allow a +10dB to +15dB (dependent on Noise Sensitive Receptor) increase on the agreed nighttime representative background. This is significantly more than the applicant's asserted "aim to achieve a noise level not exceeding 5 dB above the typical background sound levels" and results in significant adverse impact in terms of BS4142.</p> <p>Although BS4142 makes provision for the consideration of alternatives to a given rating level, as far as this Project is concerned - particularly in the context of the sensitivity of the locality - if any alternative levels were to be proposed as appropriate, ESC would only be prepared to consider them as acceptable if the proposed levels were underpinned and fully justified with detailed and robust assessment showing that the approach taken is as or more protective than the adoption of the prescribed rating level, particularly a below background rating level. Currently, based on our preference</p>	ESC requests that the Applicant should amend its aim in relation to operational noise at the converter station site to achieve a below background sound rating level, with requirements to provide mitigation where these aims cannot be met.	Unknown.

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		<p>for a rating level the stated 35dB would fall at or above +10dB and would be indicative of a significant adverse effect in BS4142, which if translated into policy terms as a SOAEL would be a barrier to consent (5.12.17 NPS EN-1).</p> <p>The acoustic character of the area is quiet and rural, ESC has therefore requested that the aim should be to achieve a below background sound rating level, with –5dB being the aspiration. For clarity, this is a quiet rural residential area as supported by National Grid’s own background sound level assessments and the proposal is to introduce a 24/7 industrial noise source and co-locate other similar projects and noise sources within the same area, notwithstanding the potential impact of a single project background sound level “creep” which is a significant and very real risk with each concurrent project. The cumulative and in-combination effect must be adequately considered and addressed. The Project cannot be considered and assessed in isolation.</p>		
4.03	Mitigation planting	New planting around the Converter Station will be a necessary addition to local green infrastructure and wildlife connectivity. ESC expects the Applicant to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a	ESC requests that this early planting is incorporated into a Requirement within the DCO. This should reflect the maximum mitigation planting scenario.	Likely

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		Requirement within the DCO. Provision should represent the maximum possible given the national significance and scale of this Project which contrasts with the introduction of local community impacts (i.e. national benefits, local impacts). This justifies an over and above 'exemplar' provision of mitigation planting.		
Topic 5 – Land for mitigation				
5.01	Reductions applied to the proposed order limits over the pre-application stage	ESC is concerned about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119.	ESC requests that the Applicant provides evidence to reassure ESC that the Order Limits in this area are sufficient in size to accommodate the necessary mitigation planting along the B1119.	Likely
5.02	Discrepancies in the order limits with those of SPR	There are discrepancies between the Project's Order Limits around Friston when compared to the Order Limits consented by SPR, including the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed should SeaLink deliver Friston substation under the project alone Scenario 2.	ESC requests that the Applicant provides evidence that the proposed Order Limits around Friston substation are adequate for the necessary mitigation measures for SeaLink, in light of the mitigations already secured for SPR as part of their own DCOs for EA1N and EA2. The Applicant should be using the SPR consents as the starting point for their own proposed embedded mitigation under a Scenario 2 connection, especially given the sensitivity of the location and its local communities.	Unknown.
Topic 6 – Construction Core Working Hours				

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
6.01	Core working hours	<p>The proposed 7 days a week working are considered unacceptable by ESC. This is due to significant concerns regarding the lack of respite impacting local residents' mental health and wellbeing (particularly given the number of projects in the district), impacts on socio-economic activity and East Suffolk's tourism industry, and noise and vibration impacts in a noise sensitive area.</p> <p>In addition, operations allowed outside the core working hours as proposed in the draft Requirements of the DCO are too wide in scope as they effectively allow working to continue outside core working hours, and could have impact in terms of noise and vibration, dust, light and other environmental impacts. The DCO should be amended to provide that all operations outside of core working hours are subject to approval by ESC as the responsible local planning authority.</p>	ESC requires the Applicant to remove Saturday afternoons, Sundays and Bank Holidays from the core working hours in the DCO, to align with the working hours previously examined and agreed for other associated and consented NSIP projects, namely SPR's EA1N/EA2 consents. These projects share aspects of the SeaLink infrastructure at Friston and have additional overlap in geospatial terms together with a similar landfall area. Operations outside of core working hours must be restricted unless otherwise approved by the ESC as responsible local planning authority. ESC will not support the currently proposed working hours.	Unknown
6.02	Cumulative effects	The Applicant suggests that longer working hours will result in the Project's construction being completed sooner. Whilst ESC appreciates that there is a balance to be struck, considering the construction impacts of other projects, and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated	As above, ESC requires the Applicant to remove Saturday afternoons, Sundays and Bank Holidays from the core working hours, and thereby following the approach that was taken in SPR's EA1N/EA2 consents. ESC will not support the currently proposed working hours.	Unknown

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		disturbance to the local communities is expected to be significant if all are consented. Therefore, respite in these extended durations must be given full consideration. Given all other comparable projects provide this respite (including projects promoted by SPR), ESC considers it entirely inappropriate to now start including these periods and creating impact at times where ESC and other projects have deliberately prevented it, particularly given the spatial relationship between SPR's projects and the proposed SeaLink project.		
Topic 7 – Flood Risk at Friston Substation				
7.01	Historic Surface Water Flooding	Friston has been subject to surface water flooding on multiple occasions, and so it is important that there is sufficient space on site to accommodate a suitable and acceptable construction drainage design. Understanding the implications of the operational drainage design for the Project and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects is also extremely important. ESC defers to the LLFA and Environment Agency (EA) on flood matters but supports the embedded measures.	ESC defers to SCC as the LLFA; and the EA and supports their concerns.	ESC defers to SCC and the EA for their judgement regarding the likelihood of resolution.

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7.02	Legacy benefits associated with reduction in flood risk	If the Project is consented, ESC strongly suggests that reducing existing and known flooding issues in the village of Friston presents a hugely beneficial legacy project opportunity. However, any such legacy benefit would need to be balanced against any other impacts introduced by the Project.	ESC requests that the Applicant assesses the possibility of a legacy project to improve flooding issues in the village of Friston. The existing watercourse in proximity to the substations area and village experiences well-known and regular problems due to silting and lack of maintenance. This presents an opportunity for the Applicant and other project promoters to plan and implement a solution benefiting the local community over and above the needs of the NSIP projects within the area.	Unknown
Topic 8 – Landfall				
8.01	Impacts from potential frack-outs	The marine HVDC cables would cross under Leiston-Aldeburgh SSSI, North Warren RSPB Reserve and Thorpe Road. The Applicant suggests that direct impacts on these designated sites will be largely avoided, and ESC notes that the Applicant should collaborate with Natural England and RSPB to ensure that the mitigation of impacts on the SSSI is feasible and adequately secured. Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted and the potential risk of ‘frack out’ associated with this technique and the impacts this could have must be fully considered. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address	ESC requests that the potential hydrological impacts of HDD are fully assessed by the Applicant and appropriate mitigation measures implemented where necessary.	Unknown

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		potential impacts which could arise must be fully explored.		
8.02	Access to the landfall	ESC is concerned that access to the landfall area by large vehicles is very limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The western end of the landfall and cabling corridor are in close proximity to residential properties. The potential for noise and vibration disturbance resulting from landfall activities must be fully considered and assessed in relation to nearby residential properties and where appropriate mitigated. Consideration must also be given to potential impacts on the tourism industry resulting from landfall access and associated activities.	ESC requests that comprehensive information is provided in relation to access to the landfall area between Aldeburgh and Thorpeness, and that noise and vibration disturbance to nearby residential receptors and the tourist economy of these areas is fully considered and mitigated.	Unknown
Topic 9 – Socio-economics, Leisure and Tourism				
9.01	Impacts on the visitor economy	ESC is concerned that the cumulative impact of SeaLink in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s). There is a high degree of interdependency between visitor destinations, employment, and supply chains within East Suffolk. Visitors move from destination to destination, employees need	ESC would expect to see that impacts on individual receptors across the District of East Suffolk, including holiday rentals, tourist accommodation, farms and businesses directly affected by the changes resulting from the cumulative impact of the Project, be appropriately mitigated and compensated where impacts are forecast. ESC requests that these mitigation and compensation measures should be developed in collaboration with ESC and the businesses	Unknown

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		to access their employment, and the potential for the displacement of visitors during construction should not be ignored. Should this project proceed, it is essential that this impact is appropriately considered, and appropriate mitigation and compensation is provided to support the continued success of the visitor economy.	themselves to maximise the effectiveness of the proposed strategies.	
Topic 10 – Ecology				
10.01	Survey coverage	ESC is concerned with what it considers to be a lack of survey coverage in relation to Breeding and Wintering Birds and Hazel Dormouse, and the subsequent impacts. ESC is also concerned that equipment failure during bat surveys has limited the results and resulted in the under-recording of bat species/activity, subsequently resulting in insufficient mitigation measures. The current assessment is therefore inadequate and must be revisited.	ESC considers that further survey work must be completed by the Applicant and the proposed mitigation measures be reviewed and where necessary revised.	Unknown
10.02	Biodiversity net gain (BNG)	ESC is of the view that more information is needed on how the project is going to achieve its minimum 10% BNG commitment in Suffolk, and how that is going to be secured and monitored in line with National Grid's commitment to managing and maintaining BNG for at least 30 years.	ESC considers that further information must be provided by the Applicant. Existing information provided is insufficient to provide the necessary certainty that the 10% BNG commitment in Suffolk will be achieved. ESC would expect 10% BNG provision to be the minimum acceptable, with a Nationally Significant Infrastructure Project such as SeaLink being an exemplar and providing above this amount of BNG.	Unknown

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Topic 11 – Lack of coordination				
11.01	Lack of coordination and introduction of cumulative and/or in combination effects	<p>ESC is disappointed and dismayed by the lack of meaningful engagement by the Applicant with other energy scheme promoters locally, in order to find opportunities to minimise and avoid cumulative and in-combination impacts. It is ESC's view that the Project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination between schemes.</p> <p>Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in our region over the next decade have been missed or simply ignored. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects on the basis of cost, with little regard being paid to the consequential long lasting damage that so much onshore infrastructure proposed within the East Suffolk district is causing and will continue to cause to its local communities and the environment. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken place, nor has any thought been given to mitigating the impacts of delivery of future energy infrastructure in this</p>	<p>ESC has had to face and deal with numerous nationally significant energy infrastructure projects in recent years, all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the district. This cannot continue to occur at 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, unsustainable and unacceptable situation.</p> <p>It is imperative, given the pressures this area of East Suffolk is facing from these projects, that the cumulative and in-combination effects of the Project with other proposed and consented projects are fully taken into account, considered and all opportunities for coordination identified and maximised. This is necessary and essential so as to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environments and the local communities, who have been hit by a constant barrage of energy infrastructure projects and will be subject to years of disruption from</p>	Unknown.

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		region. Instead, our local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another whilst being in close proximity, and resulting in cumulative and in-combination impacts that are being forced upon the District. This is unsustainable.	associated construction works, if they are consented and implemented.	
11.02	Interaction with offshore wind energy generation	The North Falls offshore wind farm project has retained an 'Option 3: Offshore electrical connection, supplied by a third-party'. Realistically, this can only relate to the SeaLink project which passes close to the wind farm. Should an offshore connection become the option selected for North Falls, however, due to any unforeseen issues or delays with the yet to be consented Norwich to Tilbury East Anglia Connection Node, then such a scenario may require additional onshore infrastructure in East Suffolk. This would not be supported by ESC. If allowing this offshore connection necessitates greater quantities of onshore infrastructure, this must be fully considered within the SeaLink DCO application to ensure a fair, robust and transparent process. An offshore wind farm connection with SeaLink could also reduce the transmission capacity of the SeaLink project, potentially resulting in the need for a second connection between Suffolk and Kent to facilitate the original purpose of the SeaLink grid network	ESC requests that the Applicant clarifies whether a North Falls offshore electrical connection provided by the Sea Link project would necessitate further onshore infrastructure in East Suffolk. If so, ESC considers that this scenario must be assessed during Examination.	Unknown.

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		reinforcement – if a need can be demonstrated. This would not be supported by ESC.		
11.03	Coordination with NGV's LionLink project	ESC is of the view that an opportunity for coordination has been missed by both the Applicant and NGV. If the Applicant laid cable ducts for the other project (such as those for HVAC cables running between the Saxmundham converter station site and the Friston substations site) at the same time as laying the ducts for the SeaLink project, this would meaningfully reduce the significant environmental impacts of both projects.	ESC requests that the Applicant includes the ability within their DCO to provide the ducting for the LionLink project. Leaving space within the same area of land (i.e. HVAC routing options) is not sufficient and does not amount to meaningful coordination between projects as it still requires two consents and two lots of cable installation disruption in the same area. The benefits of coordination, to significantly reduce environmental impacts, have therefore been missed. Given the likely close alignment of the two project's HVAC cable swathes in this area, coordination has not been built into the project, and this demonstrates that opportunities for real coordination have been missed.	Unknown
11.04	Friston Substation – impact on landscape planting	There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the landscape mitigation consented under East Anglia ONE North and East Anglia Two's consents. ESC considers it unacceptable for multiple successive projects to come forward which will diminish and damage that mitigation planting - this situation would be made worse by the project promoters not coordinating cable installation/routes between projects.	ESC requests that the Applicant is strongly encouraged to use HDD to minimise impacts on SPR's landscape mitigation around the Friston substation. Cutting a swathe of land for HVAC cable corridors through the previously consented landscape mitigation areas surrounding the substations would result in detriment to the previously approved landscape mitigation efforts for the SPR projects, which must be avoided at all costs.	Unknown.

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		ESC has a strong preference for the Applicant to use Horizontal Directional Drilling (HDD) to minimise adverse impacts on this landscape mitigation. ESC understands, however, that NGET are reluctant to use HDD under the consented landscape mitigation for the SPR projects due to cost, being regulated by Ofgem whose primary function is to protect the consumer. ESC is also concerned that this would subsequently restrict NGV's ability to use HDD methods for their LionLink project in the future, effectively setting a precedent for future works. This is unacceptable given the damage that will be caused through open cut trenching installation methods, if HDD is not used in these areas.		
11.05	Friston Substation - Embedded mitigation in Scenario 2	ESC considers that, should the substation at Friston be delivered by the Sea Link project rather than under SPR's existing consent, the level of mitigation surrounding the substation site should not be watered down given the existing sensitivities of the local communities in that area. ESC wishes to emphasise that the agreed mitigation across the projects were found to only just be sufficient. This reinforces ESC's view that the Applicant should be using the SPR consent as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston.	ESC requests that the Applicant embeds SPR's approved landscape mitigation as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston.	Unknown.

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11.06	Construction Compounds	ESC requests that the Applicant seeks to coordinate construction compounds with NGV's LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site.	ESC requests that the Applicant engages with NGV to consult and agree coordination of construction compounds during construction to reduce otherwise unnecessary and entirely avoidable impacts.	Unknown.
11.07	Masterplan for Saxmundham Converter Station site	Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station site is genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and still achieve long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.	ESC requests that the Applicant works in collaboration with other NSIP promoters and other stakeholders to ensure the converter station site is genuinely master-planned in order to achieve long-term good design.	Likely.