SUFFOLK ENERGY ACTION SOLUTIONS (SEAS)
WRITTEN REPRESENTATION

ALTERNATIVE SITES
SEA LINK DCO

PINS Ref: EN020026 **SEAS IP:** [redacted]

Date: 18 November 2025 **WR: Deadline 1**

---

1 Introduction: General statement, Summary argument and references

1.1 SEAS has already submitted a detailed Relevant Representation on "Site Selection and Consideration of Alternative Options", dated 23 June 2025, as part of (RR-5210) (the SEAS Alternatives RR).[1] The SEAS Alternatives RR is appended for ease of reference.

1.2 As the SEAS Alternatives RR makes clear, it needs to be read alongside SEAS' detailed Relevant Representation concerning the Applicant's purported need/justification case for the Proposals (SEAS Need RR[2]).

1.3 This is because the consideration of alternatives necessarily depends on a proper understanding of the needs/objectives that are said to justify a project.

1.4 As the SEAS Need RR identified, in fact the "need" for the Proposals, said by the Applicant to be founded on a 1,852MW "deficit" of transmission capability in a "worst case fault" scenario due to a projected excess of generation from the "Sizewell Generation Group", does not and will not exist. This is because Nautilus, which the Applicant relied upon for 1,500MW of future 'scaled' generation (though 'scaled' is inaccurate in the case of Nautilus), will no longer landfall at Sizewell, and that was known at least by November 2024, many months before the DCO Application was submitted. On the Applicant's own figures, properly understood, at very most there might be a worst case fault deficit in the 2030s of some 352MW. And even that 352MW was dependent on the Applicant's sister company's commercial "LionLink" proposal landfalling at Sizewell, when there was no reason for it to do so – other than that the Applicant had sited infrastructure at Sizewell in reliance on LionLink landfalling at Sizewell (an entirely circular justification).

1.5 However, at the time of the SEAS Alternatives RR and the SEAS Need RR, the Applicant had acknowledged none of this.

1.6 Hence SEAS had to prepare the SEAS Alternatives RR on the fictional bases that: (a) there would be a 1,852MW "deficit" of transmission capability in the

---

[1] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000632-B.%20SEAS%20Alternative%20Sites%20FINAL%20-%20combined%20_Redacted.pdf

[2] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000631-A.%20SEAS%20Needs%20Case%20%20FINAL_Redacted.pdf

event of a worst case fault, with Nautilus fictionally continuing to landfall at Sizewell; or (b) that the Applicant's need/justification case would become some more nebulous case based on a more general reinforcement of East Anglian transmission.

1.7 SEAS envisaged at the time of the SEAS Alternatives RR that the Applicant would attempt to switch horses to some different need/justification case, and that SEAS would therefore have to prepare detailed written representations dealing with alternatives addressed to a new case.

1.8 Instead, what has happened is that the Applicant has confirmed at Issue Specific Hearing 1 (ISH1) on 11 November 2025, that SEAS is entirely correct in its analysis of the Applicant's "need" case, the Applicant's Mr. Seb Stevens giving oral evidence as follows (so far as relevant):

(1) SEAS is correct to say that with the removal of Nautilus, the Applicant's "need" case for the Proposals landfalling in Sizewell has shifted from one based on a claimed 1,852MW transmission capability "deficit" in the event of a worst case fault, to a 352MW "deficit".

(2) The Applicant maintains that this claimed 352MW "deficit" amounts to a need for the Proposals.

(3) The Applicant asserts that the removal of Nautilus came too late in the day for it to adjust its published "need/justification" case to reflect this.

(4) The Applicant also claims that there may be a need to import electricity from Kent into East Anglia.

1.9 The third point (3), is nonsense, and the ExA can judge for itself whether it was appropriate for the Applicant to submit this DCO Application claiming a 1,852MW deficit in terms of need, many months after the Applicant knew otherwise.

1.10 The final point, (4), is new, but it can be dismissed out of hand, as SEAS' written representations dealing with need/justification explain. Mr. Stevens made the assertion without anything to support it, and any proper consideration of the evidence shows it is without foundation.

1.11 So, the position is straightforward: the Applicant's foundational "need" case for the Proposals at all, and for siting the Proposals at Sizewell in particular, is a claimed 352MW future "deficit" in the event of a worst case fault.

1.12 That 352MW is in any event an unjustified construct, derived from circular reasoning in which the Applicant's sister-company's commercial LionLink project, which has no need to come to Sizewell, is then said to be the reason there will be a transmission capability deficit at Sizewell justifying these Proposals at Sizewell.

1.13 In any event, at its highest for the Applicant, the Applicant's reasonable alternatives should have included thorough consideration of whether there are other means to meet a claimed 352MW future deficit.

1.14 The other significant change since the SEAS Alternatives RR, is the Applicant's publication of proposed changes to the Proposals, and in particular changes concerning the Benhall Bridge. What the Applicant has very belatedly acknowledged (belatedly, despite being told this in clear terms well before submission of the DCO Application), is that the Benhall Bridge is a very serious obstacle to these Proposals.

1.15 The Applicant's failure to appreciate the Benhall Bridge problems in the first place, throws into question its entire approach to site selection in Suffolk, which saw the Applicant switch, late, to Saxmundham for the converter station. If it had realised the Benhall Bridge issues, would it have alighted on the sites it had? Surely not.

1.16 In the circumstances, SEAS stands entirely behind its reasonable alternatives analysis set out in the SEAS Alternatives RR, which as noted is appended, but SEAS also now adds to the SEAS Alternatives RR consideration of the new reality for the Applicant, that:

(1) At its highest for the Applicant, the "need/justification" for the Proposals at all, and certainly for the Proposals landfalling at Sizewell area, is 352MW of claimed future worst case fault transmission capability "deficit".

(2) The Benhall Bridge presents very real obstacles to the Proposals' proposed siting in Suffolk.

1.17 Reality (1) means that the Applicant could and should be meeting the claimed 352MW "deficit" by straightforward reinforcement/upgrading of existing transmission infrastructure, at a fraction of the cost of the Proposals, and without their many harms.

1.18 Reality (2) means that the Applicant should not have been looking to site at a location dependent on use of the Benhall Bridge in any event.

1.19 This case for SEAS is on top of the case set out in SEAS Alternatives RR.

1.20 In addition to the documents we have referred to above (including SEAS' need/justification written representation that will be submitted alongside this written representation), we also point the ExA to:

- The Applicant's Change Request letter of 16 September 2025 **AS-138**
- SCC's Response to Applicant's proposed changes to Proposals[3]
- Benhall Parish Council representations at pre-application stage (various) (culminating in representation 6 January 2025[4], but see earlier representations).

[3] https://www.suffolk.gov.uk/asset-library/scc-response-to-sea-link-change-request-consultation.pdf
[4] https://benhallandsternfield-pc.gov.uk/assets/Uploads-Files/Planning-Responses/Benhall-Sternfield-Sea-Link-Response-Nov-2024.pdf

1.21 Many other documents are also relevant, but if the ExA reads those we have pointed to, we consider it will have a sufficiently clear picture.

1.22 By this written representation, SEAS further demonstrates why the needs case for the Proposals is defective, and that no strategic need for this type of infrastructure in this general location has been proved. We argue further, that even on the false presumption of this or a similar need, the process of identifying and selecting a specific location has not been carried out in accordance with National Policies nor with NSIP procedures; and that the late change request for works at Benhall Bridge lays bare these defects of strategy and process. We suggest in addition that the timing of the Change Request and the lack of detail on this matter in the original Application might almost have been designed to draw attention away from the proof of poor site selection that its present necessity demonstrates.

1.23 The structure from now is:

- What the reality for the Applicant (that on its own figures it cannot point to a future transmission capability "deficit" for the "Sizewell Generation Group" of more than 352MW) means for the alternatives analysis (including a further brief recap of SEAS Need RR and SEAS Alternatives RR, but please refer to the documents themselves).
- Relevance of Applicant's Proposed Change #4 – Benhall Bridge – to alternatives analysis.
- Summary and update in light of above.

1.24 SEAS does emphasise that it continues to stand by the SEAS Need RR and the SEAS Alternatives RR, but as updated by this written representation.

2. What the reality for the Applicant (that on its own figures it cannot point to a future transmission capability "deficit" for the "Sizewell Generation Group" of more than 352MW) means for the alternatives analysis

Recap of SEAS Needs RR and SEAS Alternatives RR

2.1 In SEAS Needs RR, we explained what the statutory framework combined with the policy framework in the relevant NPSs means the Applicant must or must not demonstrate by way of need for the Proposals.

2.2 We highlighted that whilst EN-1 provides support for, and a presumption of need for, transmission reinforcement as a *type of infrastructure*, EN-1 also makes clear (at 3.3.78 – 81) that any proposed project must demonstrate that it *'represents an efficient and economical means'* of, of relevance, reinforcing the network, or connecting new supplies. EN-1 3.3.79 specifically emphasises the requirement for *strategic* projects, as *'elements of a coherent and strategically necessary system'*. The test of efficiency and economy, of course, requires a positive balance between the need for the project and the harm it will cause.

2.3 We explained that these requirements are not met by the Proposals, and that instead when it made the DCO Application the Applicant was relying on a case there will come a time when the "Sizewell Generation Group" will be generating so much electricity that in the event of a "worst case fault" transmission reinforcement will be needed, to the tune of 1,852MW additional capability, and that the Proposals would meet that "need". We demonstrated in the SEAS Need RR that in fact this was based on a fiction, 1,500MW of that 1,852MW being accounted for by the Nautilus proposal, which as long ago as November 2024 was not coming to Sizewell area after all. We also demonstrated that another 1,600MW of assumed generation was attributable to the proposed LionLink project, a commercial project of the Applicant's sister company National Grid Ventures, which has no need to come to Sizewell at all (save to justify these Proposals – an entirely circular position), and that without LionLink there will be a considerable surplus of transmission capability even in a worst case fault scenario. We explained that even with LionLink (incorrectly) included, a 352MW future "deficit" could and should be addressed by reinforcement of existing transmission infrastructure.

2.4 SEAS Need RR having shown the lack of need/justification for the Proposals, including the lack of any strategic pooling of infrastructure justification, and the lack of any support from EN-1 as to *location*, the SEAS Alternatives RR necessarily had to proceed on a fictional basis: imagining that there would, in fact, be a "deficit" of 1,852MW transmission capability due to the Sizewell Generation Group, or some other nebulous "need" for the Proposals in East Anglia.

2.5 SEAS Alternatives RR explained that, pre-consultation, SEAS had suggested to the Applicant brownfield sites outside Suffolk (Bradwell on Sea, Isle of Grain) that are available and would avoid the unjustified harm that a Saxmundham site would cause, contrary to the requirements of s104(7) of the Planning Act 2008. We also identified a site within Suffolk (the former RAF airfield at Leiston) that is a brownfield site and would meet any newly identified need for reinforcement in East Suffolk, as well as noting that Sizewell C is still a potential option.

2.6 In the fictional world of the Applicant's need case, these suggestions offer solutions that perform against two particular goals: the sites outside Suffolk approach would promote a co-ordinated and more modern approach (we call this the 'whole package approach', supported by a modular offshore grid), and avoid providing a solution to a problem that does not exist in the absence of Nautilus; and the RAF Leiston/Sizewell C suggestions limit the damage that will be caused if for some reason the Proposals were in fact necessary.

2.6 As regards the latter, we note that NGET's basis for site selection (e.g **APP-044** ES *Main Alternatives Considered* 3.6.61-66) was that there would need to be a new common node for a group of connections – the Proposals, Nautilus and Lion Link[5] - in the Sizewell area. This was explicit in **APP-044** as quoted, where a review of potential sites based on their ability to hold three co-located converter stations (as a

[5] Eurolink at the time of preparation of the APP-044 study

proxy for ‘co-ordination’ of these projects) led NGET to promote Saxmundham as a preferred site, and to discount the RAF Leiston site on the grounds of poor transport access and Sizewell C on unspecified engineering and environmental constraints.

2.7 SEAS RR goes into detail on the advantages of the package options and the Leiston option, and we will not rehearse these here.

The Applicant’s awakening to reality and what it means for the reasonable alternatives analysis

2.8 The Applicant has now, finally, acknowledged, in response to a direct question from the ExA at ISH1 (prompted by a point made/query raised by SEAS’ barrister Mr. Burton) that the claimed 1,852MW “deficit” “need” for the Proposals no longer exists, and that its highest for the Applicant, the figure is 352MW.

2.9 SEAS disputes any need at all, for the reasons set out in the SEAS Need RR and the SEAS need written representations that will be submitted alongside this written representation.

2.10 However, the fact the Applicant itself now acknowledges no more than 352MW represents a radical shift in the approach to alternatives.

2.11 The Applicant must now re-consider whether the claimed 352MW deficit can be met by straightforward upgrading of existing transmission infrastructure.

2.12 SEAS need written representation shows that it can.

2.13 The Applicant cannot hide behind its failure to properly consider this earlier.

2.14 The Applicant was well aware, from at least November 2024, that Nautilus would not be landfalling at Sizewell, and that therefore 1,500MW of its claimed 1,852MW “deficit” “need” had disappeared.

2.15 It was the Applicant’s choice to ignore that, and press ahead with making the DCO Application on the basis of a false and out of date need case.

2.16 It is deeply troubling to consider that it was not until the Applicant was asked, directly, by the ExA at ISH1, that the Applicant acknowledged its need case presented in its Application documents, as confirmed by no less a document that its Planning Statement, simply did not exist.

2.17 SEAS requests the ExA require the Applicant to go back to the drawing board and look, properly, at whether these Proposals are needed at all, or whether any transmission capability “deficit” that might exist if LionLink landfalls at Sizewell (and why it would do so is unclear) could be dealt with by reinforcement of existing transmission infrastructure (which it clearly could).

2.18 The environmental and cost benefits from avoiding these Proposals are too great to allow the Applicant to proceed on a fictional basis, through inertia.

3 Relevance of Applicant’s Proposed Change #4 – Benhall Bridge – to alternatives analysis

3.1 As the ExA is aware, late in the day, the Applicant switched its preferred converter site option to Saxmundham, despite Saxmundham previously not having been shortlisted as an alternative.

3.2 In making this late switch, the Applicant left unanswered the questions of access to the Saxmundham site, that the Applicant suggested it had considered for the other sites, and had presumed unanswerable for those other options.

3.3 The Applicant left three options for access from the A12 for later consideration, despite warnings from District and County Councils and others that this was a critical issue that needed to be addressed at the outset.

3.4 We suggest the simplest and most perceptive comment on the Saxmundham proposals came from Benhall and Sternfield Parish Council, in January 2025[6];

> *'We must repeat our summary from July 2024 regarding the proposed access. What is now shown is not a suitable access, but* ***if this is the only access available, the Wood Farm site for the converter station is clearly inappropriate'.*** This seems to be the heart of the present situation, and SEAS endorses this opinion.

3.5 The Applicant has now submitted a Proposed Change Request (submitted by NGET on 16 September 2025).

3.6 Proposed Change#4 proposes making substantial changes to Benhall Bridge, which spans the railway line and is close to the A12.

3.7 This is for the obvious reason that the Benhall Bridge can only load bear up to some 44 tonnes, whereas the Applicant would need to bring in to the Saxmundham site multiple loads of some 500 tonnes (or more).

3.8 The recognition that the bridge requires strengthening (or rebuilding) from a load bearing capacity of 44 tonnes to 500 tonnes or more could and should have occurred long before the DCO Application was made, and should have been thoroughly identified and thrashed out during the pre-Application or consultation phases. Why it was not, is inexplicable: the changes will require major works close to the two critical transport routes for the area, the A12 and the railway.

3.9 SEAS disagrees fundamentally with the Applicant's claim in the Change Request that *'The changes proposed apply to small and discrete areas'* (1.2.1), and still more with the lazy assertion that *'The final detail of AIL routing and solutions for movements is typically developed after a DCO is made when the loads and programme for movements is known'* (1.3.5). As if something as fundamental as a railway bridge wholly inadequate to take the loads needed to build the converter could be left aside for consideration *after* the DCO is made.

3.10 We agree wholeheartedly with Suffolk County Council's very negative response to the change request, which even at this late stage lacks any of the detail that would be necessary for SCC to assess environmental, planning and engineering

[6] Reference given above.

consequences. SCC go so far as to suggest that a northern access, taking advantage of the Sizewell C relief road might present fewer difficulties. Perhaps the Leiston site might be worth exploring, in that case.

3.11 Of particular relevance here, is what, in SEAS' view, the Proposed Change#4 concerning Benhall Bridge further exposes regarding the Applicant's site selection process: namely as inadequate even on its own terms, and improperly based on circumstances that the Applicant knew were not going to apply.

3.12 Before alighting on Saxmundham as the site for the converter, access to the site should have been critically examined, and significant requirements, such as abnormal load requirements, checked against the existing local infrastructure – the fact that they were left unexplored to the extent that a major Change to the Application is now required is indicative of either poor management or tactical concealment of an issue that would reveal the poverty of the site selection procedure;

4. Summary and update in light of above

4.1 To summarise:

- If Nautilus was not going to be connecting in the Sizewell area, as was known from November 2024, there was and is no possible "need" for a "Sea Link" proposal at all, let alone to connect a "Sea Link" at Sizewell;

- The ExA should require the Applicant to look properly at whether there is any future transmission capability deficit at all, with a clear eye to whether it is appropriate to rely on NGV's commercial LionLink proposal as justification for these Proposals;

- If, somehow, LionLink is to be included, then the ExA should require the Applicant to look properly at whether a 352MW "deficit" could be met by upgrading of existing transmission infrastructure;

- If a "Sea Link" converter is to be built, there are brownfield sites at Sizewell and Leiston that could and should have been explored and analysed in detail, but which were dismissed without proper explanation;

- Before alighting on Saxmundham as the site for the converter, access to the site should have been critically examined, and significant requirements, such as abnormal load requirements, checked against the existing local infrastructure – the fact that they were left unexplored to the extent that a major Change to the Application is now required is indicative of either poor management or tactical concealment of an issue that would reveal the poverty of the site selection procedure;

- The ExA should require the Applicant to revisit the site selection process itself, to ensure that it is not in any way based on externalities, such as Nautilus or Lion Link, that should have no place whatsoever in "justifying" the Proposals.

APPENDIX A

SEAS Relative Representation (RR-5210) on Alternative Sites, dated 23 June 2025

SEAS' topic specific relevant representation regarding:

THE SELECTION AND CONSIDERATION OF ALTERNATIVE OPTIONS

SEA LINK DCO

PINS Ref: EN020026 **IP Ref:** [redacted]

Date: 23 June 2025 **Deadline: 23 June 2025**

Executive Summary

i. "Sea Link" is a proposed 2 GW high-voltage direct current (HVDC) transmission project, presently promoted by National Grid Electricity Transmission (NGET) as critical to future system reinforcement between East Anglia, specifically the Sizewell area in Suffolk, and the south-east of England, specifically Kent.

ii. For consistency with NGET's application (Planning Statement (APP-319) and elsewhere), the proposed project for which a DCO is sought is referred to as "the Proposed Project", whilst the generic concept of an offshore interconnector between East Anglia and the south-east of England is referred to as "Sea Link".

iii. This representation concerning alternative options is supplementary to SEAS' topic specific representation concerning the alleged "need" for the Proposed Project. All abbreviations and acronyms used there are repeated here, without additional explanation.

iv. Necessarily, SEAS' case concerning alternatives is advanced on the basis that NGET will, somehow, despite what SEAS says are irreparable deficiencies in NGET's need/justification case for the Proposed Project, satisfy the Examining Authority of its need case and objectives for the Proposed Project. This is a conceptually tortuous exercise, given that the alleged "Sizewell need" of c.2,000MW worst-case-fault unmet need claimed by NGET simply cannot exist by reason of the relocation of Nautilus.

v. In the circumstances, SEAS advances its alternatives case (which is concerned with the Suffolk "end" of the Proposed Project) on multiple bases.

vi. First, on the (fictional) basis that NGET can made out its need case based on the 2,000MW of "Sizewell need":

* there are brownfield alternatives that SEAS has already put to NGET pre-application that could provide the reinforcement claimed as needed, not least Bradwell-on-Sea, but not only Bradwell-on-Sea (Tendring and Isle of Grain also merit consideration, and Sizewell B/C itself surely merits reconsideration now that Sizewell C is essentially UK Government owned); and

* in any event, NGET's selection of Saxmundham as the converter station site rests on an entirely false premise (that Nautilus will come to the Sizewell area), and given the manifest harm it will cause by comparison with the previously considered alternatives, notably (brownfield) Leiston Airfield, cannot stand.

vii. Second, on a (also fictional) basis that NGET's need case somehow becomes and is procedurally permitted to become something else, namely a more nebulous case based on general reinforcement of East Anglian transmission. In which event, NGET's failure to consider and assess the several manifestly advantageous brownfield alternatives SEAS has already put to NGET pre-application (such as Bradwell-on-Sea, Tendring and Isle of Grain) is indefensible.

viii. On any view, the presently proposed infrastructure in Suffolk would cause unnecessary and unjustified harm. This is contrary to the requirements of the relevant NPSs (and NGET's own statutory obligations), and ultimately means the Proposed Project offends more than one limb of s.104 of the Planning Act 2008.

ix. SEAS considers NGET failed to consult at a truly formative stage, with an open mind, and that NGET has kept a closed mind since, despite the facts changing beneath the feet of this Proposed Project, removing any justification it might once have had.

x. SEAS wishes to submit fully detailed written representations on alternatives in due course, at the appropriate point.

xi. The points below set out SEAS' alternatives case in further detail.

xii. As with SEAS' needs case representation, all references to documents in the Planning Inspectorate's examination library are by their Inspectorate reference numbers. For example, as above, APP-319 is NGET's Planning Statement.

Legal and policy framework, and introduction to NGET's approach to options/alternatives

Section 104, Planning Act 2008

a. NGET's Planning Statement discusses the overarching test set by s.104 of the Planning Act 2008 (s.104) and the relevant National Policy Statements, which SEAS agrees are EN-1, EN-3 and EN-5 (though with EN-3 playing a subsidiary role to EN-1 and EN-5).

b. SEAS' overall case is that the DCO should not be made for the Proposed Project, because it fails when considered against various of the s.104 limbs.

c. However, for the purposes of this alternatives-specific relevant representation, the limbs of s.104 that are most obviously to the fore are s.104(2)(a) and (3) (regard to and accordance with relevant NPSs), s.104(2)(d) (regard to any other important and relevant matters) and s.104(7) (the adverse impacts/benefits balance).

d. In addition to s.104, the procedural requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regs) are relevant, and in particular the reg.14(2)(d) requirement for NGET's environmental statement (ES) to include *'a description of the reasonable alternatives studied by the applicant, which are relevant to*

the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment'. However, SEAS acknowledges they are procedural requirements only. Given the procedural-only nature of the 'reasonable alternatives' requirements of the EIA Regs, policy regarding alternatives assumes particular importance.

The relevant NPSs

e. In terms of the policy approach to alternatives in the NPSs, EN-1 is foundational, and EN-3 and EN-5 lean on it.

EN-1

f. EN-1 4.3.22-4.3.29 are important paragraphs, which we quote here:

4.3.22 Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:

• the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and

• only alternatives that can meet the objectives of the proposed development need to be considered.

4.3.23 The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.

4.3.24 The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.

4.3.25 Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.

4.3.26 As the Secretary of State must assess an application in accordance with the relevant NPS (subject to the exceptions set out in section 104 of the Planning Act 2008), if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision.

4.3.27 Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative

proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.

4.3.28 Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.

4.3.29 It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.

g. As regards EN 4.3.22 second bullet, and the importance attached to the identified objectives of the proposed development when considering alternatives, the position in the case of this Proposed Project is conceptually difficult, given its objective is to meet claimed c.2,000MW "Sizewell need" in the event of a worst case fault, but the claimed need cannot exist (see below).

h. As regards EN-1 4.3.29 and 4.3.25, SEAS confirms that it has suggested the alternatives discussed below to NGET, or NGET has itself considered them, prior to NGET's application for the DCO.

EN-5

i. EN-5 section 2.2 is important, so we quote it in full, along with its footnotes:

2.2.1 The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant6.

2.2.2 Siting is determined by:

• the location of new generating stations or other infrastructure requiring connection to the network, and/or

• system capacity and resilience requirements determined by the Electricity System Operator.

2.2.3 These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries7 and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.

2.2.4 However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the overall amount of network infrastructure required.

2.2.5 Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone8.

2.2.6 Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.

2.2.7 The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.

2.2.8 There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.

2.2.9 In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)

2.2.10 As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."9

2.2.11 Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023.

2.2.12 Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally.

6 The exception to this is where the applicant is also responsible for the development of associated generation where the initiating point is substantially within the control of the applicant but the terminating point is not.

7 In this context 'North Seas' is used to refer to the North Sea and seas around the UK and Ireland.

8 Under the Offshore Transmission Network Review, two key workstreams Early Opportunities and 'Pathway to 2030' including the Holistic Network Design supported the identification of offshore-onshore transmission routes.

9 This assumes that the developer in question is also a licence-holder under the terms of the Electricity Act 1989. In the rare case that the developer is not a licence-holder, the developer will nonetheless be influenced by the duties laid out in Section 9, even though they are not themselves under obligation. Subsequent references to the 'developer', or to the 'applicant', in the context of duties under the Electricity Act, should be read in this light.

j. As to those paragraphs, a further curiosity of this case as regards Suffolk is that, given the Nautilus shift (as explained in SEAS' needs-specific representation) the siting of the Proposed Project in the Sizewell area is not, in fact, driven by where "generators" (including interconnectors) are to connect (and NGET can hardly rely on its sister company NGV's unconsented LionLink proposal in that regard).

k. In addition, it is important that EN-5 2.2.10 gives policy-effect to the Electricity Act 1989 Schedule 9 duty on NGET to *'have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.'*

NGET's approach to options/alternatives

l. NGET's application for this DCO explains NGET's approach to alternatives in NGET's Main Alternatives Considered document (APP-044) (and this is echoed by such as APP-321, the Design Development Report).

m. It is clear that NGET approached Suffolk alternatives on the basis the "need" was "Sizewell need" (the c.2,000MW of unmet "generation" in the event of a worst-case fault, discussed in SEAS' need-specific representation).

n. NGET apparently treated that as meaning that its consideration of infrastructure siting options had to be focused quite narrowly on a "Sizewell area".

o. From that notably closed starting point, NGET considered options for landfall, connection/substation and converter and routing.

p. NGET did not consult publicly on anything other than Sizewell at one end.

q. But it is also apparent, remarkably, that NGET's consideration of options was driven by the assumption that there would be a common Sizewell area node for a "Sea Link" and Nautilus and LionLink. This can be clearly seen from APP-044 (Main Alternatives Considered), at 3.6.61-3.6.66.

r. APP-044 describes (see in particular 3.6.63) the justification for alighting upon an entirely new site for the converter station by Saxmundham, on the basis that the previously assessed converter areas were subject to *'backcheck and review'* to consider whether any could *'accommodate up to three co-located converter stations'* and also whether there were any additional sites that should be investigated/appraised for such co-location opportunities. The paragraph also describes how NGET in fact relied on the Nautilus non-statutory consultation in this respect.

s. The cart was driving the horse.

t. And that was even before Nautilus was directed away from the Sizewell area in November 2024.

u. What NGET did not do, was consider and assess the various alternatives promoted to it by SEAS, from the truly macro-level alternative of an integrated offshore grid, to the 'whole northern package' alternatives of brownfield sites such as Bradwell-on-Sea for the Proposed Project's Friston/Saxmundham package, to the localised-level alternative of former RAF Leiston for the converter site, instead of Saxmundham. NGET's failure to do so could not be justified at the time, and certainly cannot be justified now that Nautilus is going elsewhere.

v. NGET's approach to Suffolk options/alternatives does not stand scrutiny, as is further explained below.

1. Introduction to SEAS' alternatives case

1.1 SEAS advances this case on more than one basis.

1.2 The first is on the (fictional) basis that NGET can made out its need case based on the 2,000MW of "Sizewell need", in which case:

- there are brownfield alternatives that SEAS has already put to NGET pre-application that could provide the reinforcement claimed as needed (not least Bradwell-on-Sea, but not only Bradwell-on-Sea, a Isle of Grain, Tendring and even Sizewell B/C merit consideration/re-consideration); and

- in any event, NGET's selection of Saxmundham as the converter station site rests on an entirely false premise (that Nautilus will come to the Sizewell area), and given the manifest harm it will cause by comparison with the previously considered alternatives, notably (brownfield) Leiston Airfield, cannot stand.

1.3 The second is on the (also fictional) basis that NGET's need case becomes something else, namely a more nebulous case based on general reinforcement of East Anglian transmission. In which event, NGET's failure to consider and assess the several manifestly advantageous brownfield alternatives SEAS has already put to NGET pre-application (Bradwell-on-Sea, Tendring and Isle of Grain) is indefensible.

1.4 In the circumstances, given the overlap between the two cases, the various alternatives are discussed in turn, beginning with the 'whole northern package' brownfield alternatives to Friston/Saxmundham of Bradwell-on-Sea, Tendring and the Isle of Grain, and possibly also Sizewell B/C itself, then the more localised alternative of Leiston to Saxmundham for the converter site.

2 Confirmation that all of these were advanced to NGET pre-application

2.1 Leiston as an alternative to Saxmundham for the converter site was, of course, an option that NGET shortlisted before its curious Nautilus-and-LionLink-driven pivot to Saxmundham. NGET should have gone back to the drawing board, and at the very least back to Leiston, the moment Nautilus switched.

2.2 As regards the brownfield 'whole-northern-package' alternatives, SEAS can confirm that all of these were advanced to NGET pre-application, through various items of correspondence.

2.3 Not the least of those was SEAS' 3 January 2025 letter to NGET, which followed the Nautilus switch, and drew NGET's attention to the significance of that switch and that it should (doubly) consider the brownfield alternatives in the circumstances.

2.4 However, SEAS' representations regarding alternatives go back well before then, including a detailed November 2023 submission "The case for Bradwell-on-Sea" (the Bradwell-on-Sea Report), and representations over 2024.

2.5 SEAS considers that NGET should never have simply alighted on a "Sizewell end" without a proper and full public consultation process, whilst matters were at a formative stage. Moreover, that once NGET had alighted on a "Sizewell end", NGET should have recognised that the facts had changed significantly when Nautilus moved, and reconsidered matters pre-application. At the very least, NGET should not have continued with a Proposed Project built on an assumed common node for Nautilus, LionLink and Sea Link, when that was no longer the case.

2.6 As for Sizewell B/C itself as the infrastructure site, NGET did assess that, but rejected it for reasons that as presented are so vague as to be meaningless (unparticularised engineering and environmental constraints). Sizewell C is now essentially a UK Government project. Its dismissal for the Suffolk-end infrastructure for a "Sea Link" merits reconsideration.

3. The brownfield 'whole northern package' alternatives

3.1 SEAS points to at least three:

- **Bradwell-on-Sea:** A historic nuclear site with brownfield capacity and connection potential. It offers a remote, coastal alternative to sensitive inland sites.

- **Tendring 400kV Node (East Anglia Connection Node):** Identified in the ESO's Holistic Network Design (HND) as a key infrastructure point. While not currently a substation, Tendring could host one with reinforcement.
- **Isle of Grain:** Nautilus will now land at Grain, confirming its suitability as an HVDC hub.

3.2 None of these sites were properly assessed or included in any optioneering process by NGET. There is also the Sizewell B/C site itself to consider, and on SEAS' case re-consider, given Sizewell C will now be progressing as an essentially UK Government project.

Bradwell-on-Sea: A credible and lower-impact 'whole northern package' alternative.

3.3 The Bradwell-on-Sea scenario is a well-evidenced, brownfield-based alternative to the proposed Friston/Saxmundham converter complex. While not assessed by NGET, it meets the NPS criteria for an alternative. It is frankly surprising that NGET did not consider it in the ES, and that would be the case even in the absence of SEAS' Bradwell-on-Sea Report and the Nautilus switch.

3.4 SEAS considers Bradwell-on-Sea's omission from the ES and NGET's options process reflects a failure on NGET's part as regards NGET's duties under the Electricity Act 1989, Schedule 9, NGET's own guidance, as well as the NPSs, given its obvious environmental benefits over the Proposed Project's northern end.

3.5 SEAS invites the Examining Authority and the Secretary of State to give substantial weight to this option in determining whether the Proposed Project meets the tests set by statute and policy, including whether it passes the harms/benefits balance set by s.104(7). It significantly reduces the harm, whilst meeting NGET's stated objectives, as set out below.

3.6 It gives SEAS little satisfaction, but when SEAS prepared the Bradwell-on-Sea Report it did so on the basis of certain key assumptions, which have been proven well founded. As the Examining Authority and Secretary of State will see from the Bradwell-on-Sea Report, these included that (a) Sizewell C would proceed as planned and (b) Nautilus would move to Isle of Grain. Both have come to pass, the Nautilus shift in November 2024, the UK Government's decision to fund Sizewell C more recently still. Yet NGET presses on with the Proposed Project as formulated as if nothing has happened.

Reduced harm (coastal, brownfield etc)

3.7 Bradwell is directly on the coast, meaning marine cables could be landed and connected with minimal onshore trenching — avoiding the long inland HVAC/HVDC routes through National Landscape (AONB) and rural landscapes in Suffolk that the Proposed Project currently involves and the accompanying harm. This would materially reduce impacts on heritage, landscape, amenity, socio-economics, not least tourism, and impacts generally, aligning with policy and basic principles of good planning.

3.8 SEAS refers to the NPSs, as above, noting in particular EN-5 2.2.7- 2.2.8, which paragraphs make clear that the direct connection route need not, indeed often will not, be the one chosen, due to *'Siting constraints such as engineering, environmental or community considerations'*, which *'will be important in determining a feasible route'*. Those paragraphs *expect* applicants to be flexible regarding the location of such as substations and to *'consider carefully their location'*, amongst other things. Clearly with the relative impacts of different sites in mind.

3.9 Flexibility and care is required not least to reduce harm where that can be done without compromise to the objectives.

3.10 Bradwell-on-Sea's former nuclear use and existing grid infrastructure make it a brownfield, semi-industrialised site, unlike the greenfield, rural location of the presently proposed infrastructure at Friston/Saxmundham, and the use of such sites is well supported by the NPSs.

3.11 In addition to the health and well-being benefits of preserving the greenfield the Proposed Project would destroy, Bradwell-on-Sea would involve significantly lower tourism impacts as against the present Proposed Project, hence lower socio-economic impacts.

Meets the stated objectives (provides the reinforcement claimed as needed, in a timely fashion, with savings)

3.12 The claimed core 2,000MW reinforcement need can still be fulfilled by an alternative such as Bradwell-on-Sea. The existing 132kV OHL to Rayleigh could be upgraded to 400kV, offering a second 400kV crossing into the LE1 boundary, easing pressure on Bramford–Pelham. A "Sea Link" (if needed) could be landed at Bradwell or routed from Sizewell using existing transmission corridors (as could a LionLink).

3.13 In our attached Bradwell-on-Sea Report we calculated broadly similar capital expenditure for Bradwell-on-Sea compared to the Proposed Project, for hugely reduced environmental and socio-economic impacts. The reduction or even out-and-out avoidance of harm to the Suffolk tourism industry is such that Bradwell-on-Sea is a clear winner on a traditional economic calculus alone, without also placing a value on the natural capital that would be saved.

3.14 Overarching EN-1 itself, at 4.3.22-4.3.29 cited above, gives implicit encouragement to alternatives capable of delivering the same objective in a timely manner and with reduced harm, yet NGET has ploughed on despite SEAS' suggestion of Bradwell-on-Sea.

3.15 In summary, SEAS submits that this representation, and our report *The Case for Bradwell-on-Sea*, demonstrate that the exclusion of Bradwell-on-Sea is flatly contrary to the need for a logical options process and a suitable consultation exercise, both of which

processes should continue and reflect changes in material facts. It is contrary to the legislation, including the duties placed on NGET itself, and relevant policy.

3.16 SEAS and other consultees including the local MP explicitly raised Bradwell-on-Sea in consultation, so there can be no excuse. We therefore submit *The Case for Bradwell-on-Sea* as a third-party proposal, and a policy-relevant option that should have been assessed by NGET, whose failure to engage with a clearly better, less harmful and known alternative proposal fatally undermines the present DCO application.

Additional whole northern package alternatives

3.17 Whilst SEAS has spent more time considering Bradwell-on-Sea than the other 'whole northern package' alternatives, those others also have obvious merit.

3.18 Moreover, the key assumptions SEAS made in the November 2023 Bradwell-on-Sea Report (that Sizewell C would proceed as planned, and that Nautilus would switch to Isle of Grain), hold equally good for these alternatives.

3.19 **The Isle of Grain** is now where Nautilus is going. Nautilus that was, and based on NGET's application documentation remarkably still is, a key justification for the Proposed Project in the Sizewell area. It is brownfield, well placed in network terms and, ultimately, given Nautilus is now going there, and LionLink is not consented, why would a "Sea Link" not go there? With redesign and compatibility checks, LionLink and even Scottish Power's EA1N/EA2 could connect here. This would consolidate infrastructure in an existing energy/industrial zone and reduce linear sprawl and land take in Suffolk

3.20 **The Tendring Node** (East Anglia Connection Node) has similarities. It is identified in the Holistic Network Design as a strategic grid point with capacity to host interconnectors and wind projects. It already serves as a planned grid node for North Falls and Five Estuaries windfarms (which at one point were planned to connect in the Sizewell area). With suitable upgrades, it could also serve LionLink and even Scottish Power's EA1N/EA2 if Scottish Power decided to shift their connection point.

3.21 Both **Grain** and **Tendring** have clear and obvious potential to be 'whole northern package' alternatives that meet the strategic objectives, including "Sizewell need", like **Bradwell-on-Sea**, and SEAS' work on those continues.

3.22 In addition **Sizewell B/C** surely merits reconsideration as an infrastructure location now that Sizewell C has essentially become a UK Government project, rather than a private one. NGET's stated reasons for rejecting it were vague at best in any event.

3.23 Alongside and potentially in addition to all of the 'whole northern package' alternatives, NGET has shown little if any sign of considering recent innovations or lower-impact options for reinforcement, such as retrofitting existing Sizewell–Bramford pylons using high-capacity conductors (e.g., TS Conductor technology), which could potentially eliminate the need for new land take altogether.

3.24 SEAS wishes to submit fully detailed written representations on 'whole northern package' alternatives in due course, at the appropriate point.

4. Converter station local site alternative – (former) RAF Leiston (APP-044, Site 4)

4.1 RAF Leiston is the **only brownfield site** among the nine converter station site locations considered by NGET. It is large, previously developed, screened from major settlements, and adjacent to the Sizewell Link Road.

4.2 As noted, APP-044 explains, at 3.6.61-3.6.66, how NGET abandoned the previously considered converter station sites not in order to meet the claimed objectives of meeting "Sizewell need", but (3.6.63) in order to find a site that could *'accommodate up to three co-located converter stations'*, being for Nautilus, LionLink and a "Sea Link". That same 3.6.63 also reveals that NGET relied, remarkably, on NGV's non-statutory consultation for Nautilus to alight upon Saxmundham as an option.

4.3 If ever it was a defensible rationale for Saxmundham that it could accommodate three converter stations (which it was not), that rationale vanished altogether once Nautilus moved. LionLink cannot justify it (and see SEAS' representation on need in that respect).

4.4 NGET's preference of Saxmundham over Leiston cannot be defended in legislative, policy or factual terms, Leiston's environmental and other advantages being manifest.

4.5 Attached to this representation is a report prepared by Malcolm Alsop BA (Hons) DipTP MRTPI FRGS, of AlsopVerill, reviewing Leiston Site 4 against NGET's preferred option of Saxmundham Site 3 (the Alsop Report).

4.6 SEAS refers to the Alsop Report for its full detail, but in brief, compared to Site 3 (Saxmundham), RAF Leiston (Site 4):

- Aligns with NPPF and general policy priorities to build on previously developed land (the site was in use as an airfield between c.1946 and 1965, with three concrete runways overlain with asphalt, so effectively has already been developed. It is the only brownfield site of the converter sites assessed by NGET).
- Avoids the need for a major bridge over the River Fromus (a disproportionate and unfortunate 'solution' to a self-emposed problem, that brings with it obvious landscape harm, at least, if not also flood risk and other issues).
- Avoids access through a populated market town (Saxmundham).
- Reduces landscape, heritage, community and tourism impacts.
- As regards community impacts, reduces those very significantly.
- As regards landscape impacts, and heritage impacts, in addition to avoiding the need for the River Fromus bridge, Site 4 offers good existing screening and additional screen planting could be developed in keeping with the existing landscape character.

- In so far as LionLink is relevant, is closer to LionLink's proposed Walberswick landfall than Site 3, reducing cable trunking (some 2.6km estimated).
- Site 4 also has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter

  The combined cable route is 0.51km shorter with Site 4 (and whilst SEAS acknowledges that the cable route from Site 4 to the site of the consented Friston sub-station will be c.2.09km longer, the cable route picture must be viewed holistically).

4.7 The Alsop Report provides a comprehensive planning analysis showing why RAF Leiston should have been selected over Saxmundham, overwhelmingly so. The site meets all policy tests in EN-1, EN-3 and EN-5. Note, in so far as it was previously rejected on the basis of perceived access constraints those concerns no longer stand with the reality of the Sizewell C Link Road.

4.8 NGET's refusal to shift from Saxmundham is born of legacy decisions that no longer hold good.

4.9 We submit that Site 4 should have been the clear preferred option even when Site 3 appeared for the first time in the list of potential sites, and that it should be now that Nautilus is going elsewhere.

4.10 Further, it raises real issues over the logic and fairness of NGET's approach that:

(a) Site 3 was not included in the original shortlist, and appeared late, prompted by a desire to accommodate converter stations for NGET's sister company NGV's projects Nautilus and LionLink;

(b) The extent to which those NGV projects drove matters, is demonstrated by the fact that it was the Nautilus non-statutory consultation that NGET relied upon as introducing Saxmundham.

(c) Saxmundham was not properly assessed against key comparators like Site 4 (but not only Site 4).

4.11 If NGET will not do the logical thing at a whole northern project level, and start again as regards the northern end of "Sea Link", looking at Bradwell-on-Sea, Tendring, Isle of Grain etc, then NGET should at least recognise that Saxmundham is untenable and shift to Leiston.

5. Truly strategic alternatives and contingency and mitigation options

5.1 What SEAS has also argued, for many years, is that by far the best solution to the new energy generation, and interconnectors, in the North Sea off East Anglia, is an integrated offshore grid. It is manifestly the right answer, and the only thing standing in its way is short-

term thinking and, potentially, NGET's (understandable) desire to drive its own revenues. Neither of those, though, are sound strategic reasons for significant national infrastructure. Whilst SEAS appreciates that NPS policy shapes the debate, sitting under the s.104 framework, ultimately the s.104 framework is sufficiently flexible that the Examining Authority and Secretary of State can acknowledge and reflect the fact that the Proposed Project is a non-strategic mistake in their respective recommendations and decision-making. That is what should be done, and the DCO refused.

5.2 If, however, the Secretary of State considers NGET has made out its need case for the Proposed Project, then SEAS urges that the scheme be restructured to minimise harm, all of which can be done without offending the Secretary of State's s.35 direction. In this fallback scenario:

- The converter station should be **relocated to RAF Leiston**, a brownfield site further from sensitive receptors, and better screened and accessed and with various benefits as set out above.
- Consideration should be given to the creation of a **new National Grid substation at or near Sizewell**, where land and transmission infrastructure are already in place.

5.3 This integrated alternative would reduce the need for linear sprawl, avoid the sensitive Friston-Saxmundham corridor, and enable future energy infrastructure to be co-located more effectively.

5.4 The current Proposed Project **does not represent a strategic, coordinated or policy-compliant solution** for the East Anglian or national grid. It should either be withdrawn, refused, or substantially redesigned.

5.5 As for EA1N and EA2 and Scottish Power's existing consent for them, which includes a substation at Friston, Scottish Power should be encouraged to reroute elsewhere, including to **Grain** or **Tendring**, which both offer lower-impact and convenient connection opportunities.

End

National Grid Sea Link DCO

SITE SELECTION

Review of the former RAF Leiston airfield, Site 4, Theberton as a better alternative site than Site 3, Saxmundham.

Prepared for Suffolk Energy Action Solutions (SEAS)

Malcolm Alsop BA (Hons) DipTP MRTPI FRGS

alsop verrill

TOWN PLANNING AND DEVELOPMENT CONSULTANCY

JUNE 2025

Contents page

Appendices

4. **Map showing the boundaries of Sites 4 and 3 and their relationship with Leiston and Saxmundham.**

5. **Summary extracts of the Representations by Suffolk County Council, 29th May 2025.**

6. **The location of the South Saxmundham Garden Neighbourhood, as shown on Local Plan Map 53 of the Suffolk Local Plan, adopted 23rd September 2020.**

   Theberton village settlement boundaries, Local Plan Map 53.

7. **LionLink Interconnector announces Walberswick as preferred landfall location, 19th February 2025.**

8. **Crow's flight distances from Converter Sites 4 and 3 to the Walberswick Landfall Location.**

0.0 Preface

0.1 Malcolm Alsop, the author of this report, is a human geographer and chartered town planner, working in the private sector. He was employed by the former Suffolk Coastal District Council in its planning policy team from 22nd July 1983 until 31st March 1986. He was responsible for much of the area subject to these proposals.

0.2 Latterly, in 2018 and 2020 he participated in examination hearings in connection with Garden Communities proposed for West of Braintree and Colchester / Braintree Borders by the North Essex Authorities Shared Strategic (Section 1) Plan, working with Martin Edwards of Cornerstone Barristers and concerned local people and organisations to promote sustainable approaches to development.

0.3 The evidence and content below have been collated and formatted to the best of his abilities. It incorporates the work of Andrew McDonald and of Gordon Young BSc MA RIBA ARB both members of Suffolk Energy Actions Solutions ('SEAS'), which is gratefully acknowledged.

1.0 Executive Summary

1.1 EN-1: Overarching National Policy Statement for Energy and EN-5: National Policy Statement for Electricity Networks Infrastructure strongly support the general need for projects like Sea Link, giving substantial weight to energy security, decarbonisation, and system resilience.

1.2 However, EN-1 3.3.78 and EN-5 2.2.5–2.2.10 enable me to argue that:

- ❖ Sea Link is not the most efficient or economical solution.
- ❖ Other routes or locations (e.g. Tendring, Isle of Grain) could meet objectives with less environmental or heritage harm.
- ❖ The siting of substations and converter stations at Friston/Saxmundham is not inevitable—alternatives exist and should be properly considered.

1.3 The stated and evidenced position of Suffolk Energy Action Solutions ('SEAS') is that Sea Link's interconnector should not be coming ashore in a non-industrial location, and that other options exist within the planning and delivery time-frame that would make that possible as well as more economically effective and technically advanced. That option has been omitted from this application by National Grid Electricity Transmission ('NGET') for a Development Consent Order ('DCO'), which is a grievous error. After a thorough examination of the material I find the application as it stands is unconvincing and poorly evidenced, My report for my representation on the matter of process is based therefore on that of NGET:

- ❖ Failure to correctly assess the advantages of siting converter infrastructure on existing brownfield sites, or to give adequate weight to these advantages, as

set out in consulting and optioneering process documents and their commitments;

- More specifically, failure to identify land at the former RAF Leiston Airfield (*'Converter Site Area C', 'Potential co-ordinated (co-located) converter station site 4'*) as the most suitable option for the converter stations on the grounds set out below. Site 4 is the only one of the nine sites considered for a converter that is a brownfield site.

- I identify a number of issues with regard to the identification and selection of a connection point and the identification of the converter site selection, including failure to respond substantively to issues raised on this point in 'Targeted consultation' (August 2024), failure in transparency over the CION process, including failure to declare NG's interest in the Scottish Power Renewables DCO application of the East Anglia 1 North and East Anglia Two windfarms.

1.4 NGET made a basic and revealing error in its case for the Saxmundham site (Site 3) in not considering or identifying the site at *any* stage before the final preferred selection of a multi-converter site, and not even at that stage making a full case for its preference over the other candidate sites. This point will be made throughout this review document.

1.5 My concern in this representation is that in the consideration of options, the weighting of benefits and constraints has excluded the only potential brownfield site in the option area without proper and detailed consideration; and that as a result the selection of any of the other sites is flawed and should not be accepted.

1.6 The planning process has as its cornerstone the concept of sustainability. Chapter 11 of the NPPF "Making effective use of land" emphasises the *Priority to Build on Previously Developed Land* and which means that unless there are no genuine, sustainable alternatives for the provision of homes, commercial development and supporting infrastructure, land that has not been previously developed land should not be built on.

1.7 In harmony with this crucially important tenet of the NPPF, one of the nine Strategic Priorities of the Suffolk Coastal Local Plan, adopted 23rd September 2020 is to *Mitigate human impact on the environment and reduce contributions to climate change by conserving natural resources.*

1.8 In APP-369 NGET claimed that Area A / Converter Site 4 "*was constrained by the existing access, however the development of the proposed Theberton bypass as part of the proposed Sizewell C development would alleviate some of these constraints if developed in time"*. It will almost certainly be developed in time. Accessing Site 4 will be relatively straightforward from the Sizewell C Link Road.

1.9 Excepting one further mention of the potential 'existing access' perceived problem, there is no real consideration of the RAF Leiston site *per se* in the first assessment, nor any calculation however simple of any balance of benefit and disbenefit. This rather bears out the broad and rather sweeping assumption noted above. The only brownfield site available for consideration (Site 3) has been optioned out on the grounds of cost and convenience – although it is the only option site situated more than 500m from any settlement, and has the potential of the Sizewell C B1122 improvements to give it as good or better access that any of the other options.

1.10 Additionally, Site 4 has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter.

1.11 Saxmundham was never included in the original site review and no adequate justification or criteria have ever been provided for the selection of Site 3 as the Preferred Converter Site.

1.12 Site 3 will require one new, permanent bridge and another temporary structure to allow Abnormal Indivisible Loads to approach the site during construction. This clearly raises questions about the adequacy of the scrutiny of the RAF Leiston site, which would need neither.

1.13 It must be emphasised that Site 3 had not been examined or explored in detail as an option for Nautilus. It follows that this undermines its identification as the Preferred option site.

1.14 It is wholly inappropriate for NGET to deploy evidence from a non-statutory consultation about Nautilus as a foundation for a completely different project.

1.15 I concur with Suffolk County Council about a bridge over the river Fromus being 'a disproportionate solution': Site 3 would entail the new access road and a substantial bridge (26 metres span and 4 metres high capable of taking up to 500 tonnes) over the river Fromus, with associated impacts on the market town of Saxmundham, with a population of *circa* 5,000.

1.16 The concerns identified by Suffolk County Council in its detailed representations of 29th May 2025 span a wide range of issues. Most importantly, that it proposes a disproportionate solution to a problem that NGET imposed on itself to create a permanent access to the converter station site that would create significant adverse impacts on designated and non-designated heritage assets caused by the permanent loss of existing wooded vegetation and cause harmful impact on landscape identified as an important rural approach to the town.

1.17 To add to the concerns expressed by Suffolk County Council about the potential impacts on Saxmundham, the Suffolk Coastal Local Plan, adopted 23rd September 2020, contains Policy SCLP12.28: Strategy for Saxmundham. Its principle provisions are as follows:
Saxmundham will be enhanced as a market town, employment and service centre, serving a key role in meeting the needs of its residents, surrounding rural communities and visitors, recognising the opportunities related to the connections offered by the rail and A12 transport corridors.

The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for housing, employment and community facilities, focused around the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks.

1.18 The South Saxmundham Garden Neighbourhood is very close to the proposed site access.

1.19 Impacts on amenity of residents: Saxmundham 4,875 (2022) compared with Theberton village, approximately 211 (2021) (see paragraph 7.5) = x23. Impacts of major development on residential amenity are unavoidable and regrettable. It is incumbent on any developer to seek to reduce impacts as much as possible, particularly if financial advantage accrues. Impacts would be much less with Site 4 than with Site 3, whilst I consider that Site 4 has cost advantages over Site 3.

1.20 I, like the wider public am mystified as to how Site 3 came to be the Preferred Converter site given its very late emergence as a contender. Suffolk County Council has, so far as I am concerned, clearly and comprehensively shown that Site 3 should be deselected.

1.21 A summary of the pros and cons of Site 4 relative to Site 3 as a converter location are:
PROS

1. Access will be easier with the SZC Link Road, there will be no expensive bridge to build to cross the River Fromus, a disproportionate solution to a self-imposed problem.
2. The Site 4 site will be a shorter cable route for LionLink from the Walberswick landfall location. The distance saving is 2.6 kilometres.
3. Less disruption to communities by a very significant factor.
4. The site was in use as an airfield between 1946 and 1965, with three concrete runways overlain with asphalt, so effectively has already been developed. It is the only brownfield site of the none converter sites examined.
5. It is large enough to accommodate the projects.
6. It offers good existing screening and additional screen planting could be developed in keeping with the existing landscape character.

7. Site 4 has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter
8. The combined cable route is 0.51km shorter with Site 4.

CONS

1. The cable route from Site 4 to the site of the consented Friston sub-station will be 2.09km longer.

1.22 There are so many issues with NGET's proposals for Sea Link. These concerns are shared by me, Suffolk County Council and many others. It is reasonable to conclude that the application for the Development Consent Order is premature. It should be withdrawn so that NGET can attend to the various procedures properly, as it should have done and then supply the material required by various parties under a new application.

2.0 Summary of Project

2.1 The text below is from the developer's website.

Why we need to build Sea Link

The existing electricity network in both Kent and Suffolk needs upgrading. This is because the UK's electricity grid was originally built in the 1960s to connect electricity generated in power stations from fossil fuels, such as coal, from the North and Midlands of England and South Wales. As the UK moves away from fossil fuels and increases clean energy generation, which is largely offshore, we need to connect electricity in new places.

Demand for electricity is also expected to increase by 50% by 2035, and double by 2050, as we decarbonise the energy that's used for things like heating and transport.Therefore, significant new infrastructure is needed to connect this clean energy from where it's now generated to homes and businesses.

About the project

Type of application: Electric Lines

Name of applicant: National Grid Electricity Transmission

The Sea Link Project comprises ***construction of a new converter station within 5km of the proposed Friston substation to*** *be connected via High Voltage Alternating Current (HVAC) underground cables between the new converter station and the proposed Friston substation. The connection will continue via High Voltage Direct Current (HVDC) underground cables from the new converter station to the coast and will join the new offshore HVDC cable at Suffolk Coast. The new HVDC offshore cable will be approximately 130km long and will link with Kent Coast at Pegwell Bay.*

The connection of the offshore HVDC will then be made with the new proposed converter station within 5km of the existing Richborough Substation and then there will be an approximate 1km HVAC connection made directly onto the overhead line.

3.0 National Policy for Energy Infrastructure and Electricity Network Infrastructure Projects

a. Introduction

3.1 The Department for Energy Security & Net Zero published the latest versions of National Policy Statements ('NPS') on 22nd November 2023. They came into force on 17th January 2024. EN-1: Overarching National Policy Statement for Energy sets out national policy for the energy infrastructure and provides planning guidance for developers of nationally significant energy infrastructure projects. EN-5: National Policy Statement for Electricity Networks Infrastructure provides planning guidance for developers of nationally significant electricity network infrastructure projects.

3.2 In this section I summarise the key provisions of EN-1 and EN-5 as they apply to the Sea Link project and so as to set a foundation for what I have to say in subsequent sections of this report. I make use of bold type to emphasise salient points.

b. EN-1: Overarching National Policy Statement for Energy

3.3 Section 3 of EN-1 relates to the need for new nationally significant energy infrastructure projects.

- Paragraph 3.2.6 confirms that the government has **demonstrated an urgent need** for the types of energy infrastructure it covers.

- Paragraph 3.2.7 mandates that **substantial weight** be given to this need.

- Paragraph 3.2.8 clarifies that the Secretary of State need **not consider** a specific project's individual contribution to this need.

3.4 The relevance to Sea Link is that it is described as a **bootstrap interconnector**, fits under EN-1's umbrella of needed infrastructure, although it is not expressly listed as a form of nationally significant infrastructure project ('NSIP').

3.5 Paragraph 3.3.68 specifically identifies a need for **substantial reinforcement in East Anglia**, with possible additional offshore connections landing in England.

3.6 Paragraphs 3.3.71–3.3.81 emphasise a **coordinated approach** to transmission, supporting strategic developments like Sea Link to ensure grid resilience and economic efficiency.

3.7 Paragraph 3.3.78 identifies network reinforcement as needed if the project is an efficient and economical means of:

- ❖ Connecting a new generator
- ❖ Reinforcing network resilience
- ❖ Ensuring future demand capacity

3.8 Section 4.2 addresses **The critical national priority for low carbon Infrastructure. It** outlines that projects like Sea Link fall under **Critical National Policy ('CNP') infrastructure** and benefit from policy support where substantial weight must be applied - even within protected landscapes or heritage settings.

3.9 Section 4.3 is titled "Environmental Effects / Considerations". Paragraphs 4.3.22–4.3.29 set out how alternatives should be assessed:

- ❖ Only **proportionate** and **relevant** alternatives need be considered.
- ❖ The Secretary of State should focus on alternatives with a **realistic prospect** of delivering equivalent benefits on the **same timeline**.
- ❖ Hypothetical or vague alternatives (e.g. immature offshore grids) may be dismissed.
- ❖ Alternatives suggested by third-parties must be **evidenced**.

c. EN-5: National Policy Statement for Electricity Networks Infrastructure

3.10 The key elements of EN-5 in so far as Sea Link is concerned relate to the Need Case and Site Selection.

3.11 **Critical National Policy Status** is reiterated in EN-5 at paragraphs 1.1.5 and 2.1.5—**all new grid projects** are CNP infrastructure.

3.12 Site Selection & Design (Section 2.2 deals with factors influencing site selection and design. The starting point for infrastructure siting is **system requirements** (2.2.2), not developer preference.

- ❖ Emphasis is placed on **strategic network design** as well as environmental and heritage impact mitigation.
- ❖ Section 2.2.10 emphasises **developers' statutory legal and policy duties** under **Schedule 9 of the Electricity Act 1989**, including environmental and heritage considerations.
- ❖ Paragraph 2.2.8 acknowledges **flexibility** in the siting of substations and converters, meaning SEAS can argue better alternatives exist.

4.0 Process

a. Basis of Representation

4.1 I am aware that Suffolk Energy Action Solutions ('SEAS') takes the position that Sea Link's interconnector should not be coming ashore in a non-industrial location, and that other options exist within the planning and delivery time-frame that would make that possible as well as more economically effective and technically advanced. That option has been omitted from this application by NGET for a Development Consent Order ('DCO'), which is a grievous error. After a thorough examination of the material I find the application as it stands is unconvincing and poorly evidenced, My representation on the matter of process is based therefore on that of NGET:

- Failure to correctly assess the advantages of siting converter infrastructure on existing brownfield sites, or to give adequate weight to these advantages, as set out in consulting and optioneering process documents and their commitments;

- More specifically, failure to identify land at the former RAF Leiston Airfield (*'Converter Site Area C', 'Potential co-ordinated (co-located) converter station site 4'*) as the most suitable option for the converter stations on the grounds set out below. Site 4 is the only one of the nine sites considered for a converter that is a brownfield site.

- I identify a number of issues with regard to the identification and selection of a connection point and the identification of the converter site selection, including failure to respond substantively to issues raised on this point in 'Targeted consultation' (August 2024), failure in transparency over the CION process, including failure to declare NG's interest in the Scottish Power Renewables DCO application of the East Anglia 1 North and East Anglia Two windfarms.

4.2 Please see **Appendix 1** which identifies the material used to inform this section on 'Process'.

b. Commentary

4.3 NGET is required, by its own organisational commitments as much as by statutory regulation, to ensure that any new infrastructure is sited so as to maximise the public benefit balance between technical, environmental, socio-economic and cost factors in the development. This is documented in, for example, APP-320, 7.2 Strategic Options Back Check Report, Version A (March 2025) paragraphs 5.1.4/5.15:

We apply a technical filter as part of this assessment to ensure any solution meets the need, either individually or as part of a wider group of reinforcements. There are many ways to achieve increases to our network capability. To allow us to focus

on those that best meet our obligations to the environment and consumers we apply a "benefits filter", which ensures any option we present has a comparable benefit over an alternative. The criteria for an option to be considered are any of the following:

- *an environmental or socio-economic benefit;*
- *a technical system benefit; or*
- *a capital and lifetime cost benefit.*
- *Where the benefits of options are very similar to each other, options will be included for appraisal to ensure we capture possible solutions that are of -very similar capability.*

- *All options taken forward for appraisal are evaluated in respect of environmental constraints, socioeconomic effects, technology alternatives, capital and lifetime costs. Undertaking this appraisal ensures stakeholders can see how* ***we have made our judgments and balanced the relevant factors in accordance with our legal duties****.*

4.4 These statements echo the overriding duties on developers set out in APP-048, specifically EN-1 paragraphs 5.10.32 and 5.10.33 relating to applications for development within AONBs and other designated areas, and the exceptional nature of these circumstances.

The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: • the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; • the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. [5.10.32]

The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.
[5.10.33]

4.5 However, in arriving at preferred options for consultation and development, NG has failed to give due weight in line with the Holford and Horlock Rules, and their own 'Our Approach to Options Appraisal' (2012), as well as failing to respond adequately to consultation responses. This is suggested by the approach to identification of option areas set out in paragraphs 5.2.22 and 5.2.28 of the Corridor and Preliminary Routing and Substation Siting Study ('the CPRSS') dated October 2022 (APP-368, 8.1)

Due to land use of the Project study area defined by the connection points, there

was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements These refined corridors [ie between landfall and converter site options] *were identified by means of professional judgement, rather than a set of defined parameters e.g., they were not developed to a specified width but were limited by larger constraints such as:*

- *avoidance of designations where possible;*
- *avoidance of settlements; and*
- *consideration of traffic and access opportunities.*

4.6 Consideration of the former RAF Leiston airfield site (Site 4) in this method of 'professional judgement' came in two parts of the original Options Selection and Design Evolution Report (OSDER, APP-369, 8.2). The original assessments were in support of a single design for the Sea Link project; and this was supplemented by a further assessment to consider the suitability of sites for co-location of later projects (at that time Nautilus and LionLink).

4.7 NGET made a basic and revealing error in its case for the Saxmundham site (Site 3) in not considering or identifying the site at *any* stage before the final preferred selection of a multi-converter site, and not even at that stage making a full case for its preference over the other candidate sites. This point will be made throughout this review document.

4.8 In the relevant OSDER paragraph (APP-369, 8.2.[4.3.52]), the steps of the argument to arrive at a Preferred Option can be characterised as follows:

i. Exclude any connection to existing Sizewell substations on the grounds of (unquantified or further specified) '…engineering and environmental constraints..';

ii. Exclude any new connection point (and associated substation) in the Sizewell power station area, on the grounds (again not further specified nor quantified) that there would be no environmental or socio-economic , technical or economic benefit';

iii. Therefore Identify the now consented Friston substation as the Preferred Connection point.

4.9 My concern in this report for this representation is that in the consideration of options, the weighting of benefits and constraints has excluded the only potential brownfield site in the option area without proper and detailed consideration; and that as a result the selection of any of the other sites is flawed and should not be accepted**.** In this report I will demonstrate this in detail, and will contrast the

process that has produced this destructive and unnecessarily disruptive proposal with regard to counterproposals backed by a wide range of local statutory and voluntary organisations – all of which are firmly in favour of the drive to renewable energy resources, and none of which wishes to see this delivered at the unnecessary expense of the environment and local communities.

5.0 Specific Additional Concerns about Process

5.1 Michelle Bolger[1] of Expert Landscape Consultancy set out the text below in chapter 3 "Site Selection and Co-Location" of her Landscape and Visual Review of the Preliminary Environmental Information Report for the Proposed Sea Link Converter Station at Saxmundham, prepared for SEAS, and dated December 2023.

PEIR Volume: 1 Part 1 Introduction Chapter 3 Main Alternatives Considered Version A October 2023 (Chapter 3 Main Alternatives) and PEIR Volume: 1 Part 2 Suffolk Onshore Scheme Chapter 1 Evolution of the Suffolk Onshore Scheme Version A October 2023 (Chapter 1 Evolution of Suffolk Onshore Scheme) set out the evolution of the scheme in Suffolk. Several locational decisions were required with respect to the Network Connection, the Landfall, the Converter Station and the cable route. This review is only concerned with the process by which the Saxmundham Converter Station become the preferred option for both the Saxmundham Converter Station and the three converter stations proposal. [paragraph 3.1]

Initially nine converter site areas were identified[2]. For ease of reference Figure 1.3.5 Suffolk Converter Site Areas is included in Appendix A. Chapter 3 Main Alternatives Paragraphs 1.3.5.16 - 1.3.5.20 set out the criteria for the Converter station site option areas. It is notable that the site for the Saxmundham Converter Station is not one of the nine sites identified in Figure 1.3.5 Suffolk Converter Site Areas. [3.2

Chapter 3 Main Alternatives Paragraph 1.3.5.68 sets out that 'During engagement with stakeholders Suffolk County Council and East Suffolk District Council emphasised the importance of looking at opportunities to co-ordinate with the interconnector projects being proposed by National Grid Ventures (NGV) in the area.' As a result, the nine site options already identified were reviewed and 'This process was also used to identify any additional sites that should be investigated/appraised further for co-location opportunities.' [3.3]

[1] In replicating this text, Malcolm Alsop would like to acknowledge his gratitude to Michelle Bolger.

[2] Chapter 1 Evolution of the Suffolk Onshore Scheme Version A Paragraph 2.1.2.22

Seven sites were then identified as potentially offering opportunities for three converter stations and an 'appraisal was undertaken of these sites in accordance with the National Grid options appraisal methodology[3]. Chapter 3 Main Alternatives states that 'A summary of this appraisal is presented in Volume 1, Part 2, Chapter 1, Evolution of the Suffolk Onshore Scheme.' It then concludes that 'Two sites were identified as preferred for the development of the Proposed Projects converter station, as well as offering the potential to co-locate with the NGV projects. [3.4]

It is not clear what two sites are being referred to here[4]. No references are provided and none of the figures that accompany Chapter 3 show them. Nor is it made clear that one of these sites, the Saxmundham Converter Station site, was not one of the nine original sites reviewed. There is no explanation as to why a site that was not even included at the initial stage is now the proposed site. [3.5]

Chapter 1 Evolution of Suffolk Onshore Scheme starts with Figures 1-4 which show the Evolution of the Suffolk Onshore Scheme – Routeing and Siting Stage. The site for the Saxmundham Converter Station does not appear on these figures. The site first appears on Figure 2.1.3 Potential Coordinated Converter Station Sites – Routeing and Siting Stage (included in Appendix A for ease of reference) which shows the location of seven sites identified as possible sites for three converter stations. Figure 2.1.3 includes two entirely new sites. [3.6]

Paragraphs 2.1.2.72 - 2.1.2.78 provides a summary of the appraisal of the sites undertaken in accordance with the National Grid options. However, it is a narrative summary only and does not explain why Site 3, the Saxmundham Converter Station is the preferred site. [3.7]

It is requested that NG provide the full assessment along with the National Grid options appraisal methodology so that it is possible to interrogate the judgments made and the weight given to them. For example, the settlement of Sternfield is described as being located to the northwest of Site 2 but no reference is made to the fact that it is located to the southeast of Site 3. This suggests that no weight was given in the assessment to the proximity of the Saxmundham Converter Station to the settlement of Sternfield. [3.8]

[3] Part 1 Introduction Chapter 3 Main Alternatives Considered paragraph 1.3.5.71

[4] In fact they are Sites 1 & 3 shown on Figure 2.1.3 Potential Coordinated Converter Station Sites – Routeing And Siting Stage which is not included in Chapter 3 Main Alternatives

Without the full assessment it is not possible to know whether the judgments that have been made are reliable. In addition, NG needs to explain how a site that they had not originally identified as suitable for a single converter station is now considered suitable for three converter stations. [3.9]

5.2 Section 6.0 contains further consideration of these matters.

6.0 Sustainable Development and the Need to Prioritise Brownfield Land for Development

6.1 The National Planning Policy Framework ('NPPF') provides the foundation for planning policy and decision-making in England. At its heart is the concept of sustainable development. The current version of the NPPF was published in December 2024. Shown below are key paragraphs on sustainable development and the priority to build on previously developed land.

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. [paragraph 7]

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a. *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

b. *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

c. ***an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land**, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate*

change, including moving to a low carbon economy. [paragraph 8]

6.2 The concept of sustainability is a crucially important tenet of the planning process. Chapter 11 of the NPPF "*Making effective use of land*" emphasises the *Priority to Build on Previously Developed Land*, as exemplified by the following provisions:
Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. [paragraph 124]

Planning policies and decisions should:
c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; [paragraph 125]

Supporting a prosperous rural economy
The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist. [para 88]

Previously developed land: *Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.* **Glossary**

6.3 The priority to develop on previously developed land means that unless there are no genuine, sustainable alternatives for the provision of homes, commercial development or supporting infrastructure, land that has not been previously developed land should not be built on.

6.4 One of the nine Strategic Priorities of the Suffolk Coastal Local Plan, adopted 23rd September 2020 is to *Mitigate human impact on the environment and reduce contributions to climate change by conserving natural resources.* Local Plan Policies that will deliver this Strategic Objective are reproduced at **Appendix 2**. Text shaded amber is considered particularly pertinent to the proposals by NGET for Sea Link.

7.0 Site Selection

7.1 National Grid Document APP-369 8.2: Options Selection and Design Evolution Report (October 2023) describes that *nine Converter site Areas were considered, Converter site Areas A, B, C, D, E, F, G, H and I.* The one closest to Converter Site 4 was Converter site Area A. The Preferred Converter Site 3 just beyond the southeast edge of Saxmundham was not near a Converter site Area. The only one in the vicinity of the town was Converter site Area G. That is located southwest of Saxmundham and is bordered to the east by the A12 and the west by Deadmans Lane. Unlike Preferred Site 3, it is not almost contiguous with the town.

7.2 For the original Sea Link-only programme, APP-369 at paragraph 4.3.27 sets out a potential Converter station Area C "...*located on the site of the former Leiston Airfield, [..] bordered to the south by Harrow Lane, to the northwest by Theberton Woods. Moat Road runs west to east through the northern half of the area*.' In paragraph 4.3.38, NGET noted that the "*the proposed Sizewell C development would alleviate some of these constraints if developed in time"*. area *was constrained by the existing access, however the development of the proposed Theberton bypass as part of the proposed Sizewell C development would alleviate some of these constraints if developed in time"*. It will almost certainly be developed in time.

7.3 The map at **Image 1** below shows a reasonable approximation of the line of the Sizewell C link road. Accessing Site 4 will be relatively straightforward from the SZC Link Road.

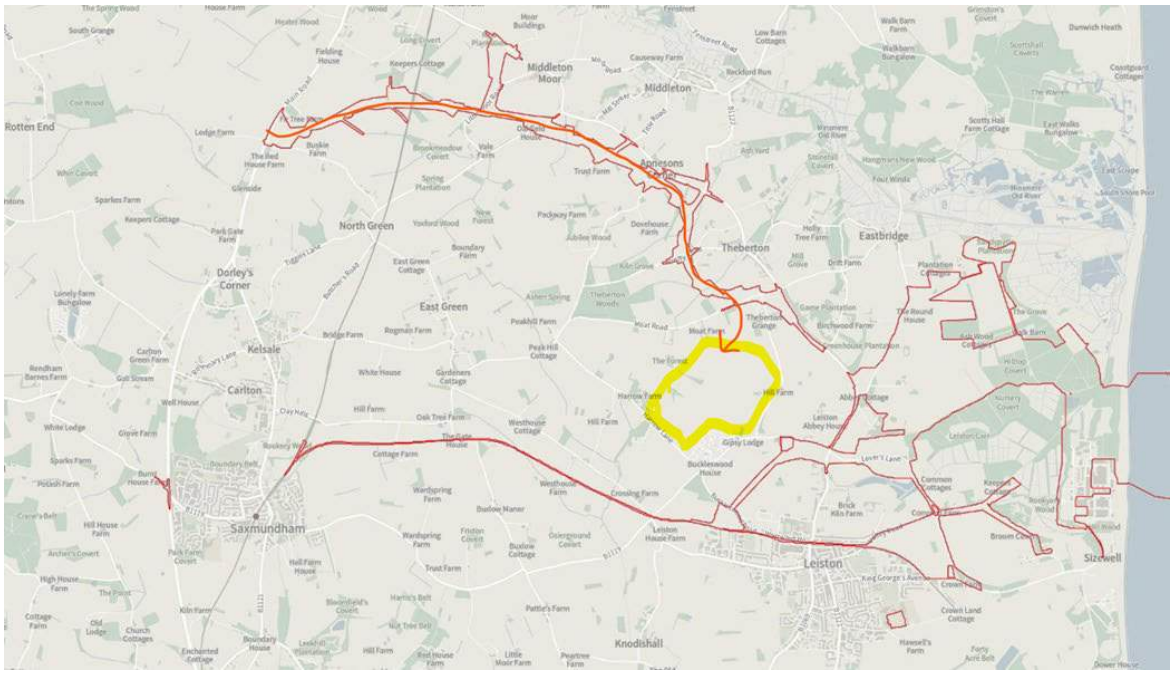


Image 1: A Reasonable Approximation of the Line of the Proposed Sizewell C Link Road and its Relationship with Site 3, the Site of the Former RAF Leiston. Courtesy of Gordon Young, SEAS member

7.4 The aerial photograph at **Image 2** below shows the line of the new Link Road and the proximity of the Airfield Site to it (roughly identified with a red boundary).

Image 2: Line of the Proposed Link Road and the Site of the Former RAF Leiston. courtesy of Gordon Young, SEAS member

7.5 RAF Leiston is about 1km (0.62 miles) south of Theberton, a village located on the B1122 road which connects with Leiston to the south. The parish of Theberton with Eastbridge (approximately 1.5km / 0.9 miles to its east) had a population of 281 in 2021 (279 in 2011). Approximately 75% of the population of the parish of Theberton with Eastbridge lives in Theberton village (211). It is a rural parish and has no allocations for new housing in the Suffolk Coastal Local Plan, 2020. The parish of Middleton is situated to the north. This had a population of 378 in 2021.

7.6 Converter Site 4 was contiguous with part of converter site Area C and was located further away from the Suffolk Coast and Heaths AONB and offers good existing screening and additional screen planting could be developed in keeping with the existing landscape character. Access to this site was claimed to be challenging as it is accessed via small country roads; however, Site 4 had the benefit of the proposed new link road being developed as part of the proposed Sizewell C Nuclear Power Station[5] albeit the cumulative impact with this development would be a consideration.

[5] The Sizewell Link Road is a new permanent 6.8km single carriageway road, beginning at the A12 south of Yoxford, bypassing Middleton Moor and Theberton, before joining the B1122.

Image 3: Leiston Airfield, 12th June 1946

7.7 APP-369 at paragraph 4.3.63 states:
The site contains the former RAF Leiston Airfield, therefore this non-designated asset would need to be considered further if taken forward for development.

7.8 **Image 3** above shows Leiston Airfield in June 1946. It had three runways. In an extensive feature on RAF Leiston, Wikipedia relates its unarguable brownfield credentials. Under the heading 'History – USAAF[6] Use' it records:
The three runways were concrete overlaid with asphalt, with 62 aircraft dispersals (38 concrete pans and 12 twin pens with blast walls) situated along its perimeter track. The USAAF added 17 PSP parking squares and a walled 6-plane revetment for additional aircraft parking. Support structures included two T-2 hangars (each 239+½ ×115 × 29 ft (73.0 × 35.1 × 8.8m) in dimension) and 12 corrugated steel 60 ft (18 m) wide Over Blister hangars dispersed on all sides of the perimeter track. The ten living sites located west of the airfield had a capacity for 1,709 personnel.

[6] United States Army Air Force

7.9 Under ‘Current Use’, Wikipedia notes:
Today Leiston airfield is virtually unrecognisable. The airfield area itself, has largely been returned to agriculture except for the Cakes & Ale Park, about 1/3 of the main runway and a short section of perimeter track further down Harrow Lane. The NW runway still exists in its full length but has been reduced to a width of about 4 m (13 ft) and cannot be viewed from public roads.

A few old buildings still exist on the airfield and also on a domestic site but most are overgrown with vegetation and are in poor condition.

7.10 Excepting NGET’s broad and sweeping assertion about the perceived ‘existing access’ problem, there is no real consideration of the RAF Leiston site *per se* in the first assessment, nor any calculation however simple of any balance of benefit and disbenefit. This rather bears out the broad and rather sweeping assumption noted above.

7.11 It is possible to challenge each of these steps, especially in terms of the implied timing of construction for both the Sizewell C and the Sea Link projects. However, the combined ‘weight’ of the arguments (if accepted) now forcibly reduces the original five landfall options and nine converter site options to those few that can reduce cost and technical difficulty, rather than those that would offer significant mitigation of socio-economic and environmental impacts – which is to say, that the only brownfield site available for consideration (at the former RAF airfield) has been optioned out on the grounds of cost and convenience – although it is the only option site situated more than 500m from any settlement, and has the potential of the Sizewell C B1122 improvements to give it as good or better access that any of the other options.

7.12 That the current site proposed in the DCO (Site 3, Saxmundham) will require one new, permanent bridge and another temporary structure to allow Abnormal Indivisible Loads to approach the site during construction clearly raises questions about the adequacy of the scrutiny of the RAF Leiston site, which would need neither.

7.13 Once again there is little actual consideration of the advantages and disadvantages of the former RAF Leiston airfield as a converter site in the discussion (APP-369, paragraphs 4.3.53 – 4.3.62) of the landfall sites and associated corridors from each towards the now identified sub-station site at Friston – merely a further mention of the ‘existing access’ (this time without any mention of the significant difference the Theberton bypass (see APP-369, paragraph 4.3.38) would bring to this option constraint, and the unquantified note of a ‘significantly longer’ onshore cable route towards landfall area of search S2.

7.14 Please also see paragraphs 4.6, 7.2 and 7.7 above.

7.15 The Preferred option on this basis is found to be 'Area E', between Aldringham and Friston. However, as noted, a second 'assessment' was then carried out as a back-check of the options to determine the potential of co-locating future projects on one site (APP-369, paragraphs 4.3.52 – 4.3.91.) Four sites are considered in this assessment, one of them on part of the original assessment site at former RAF Leiston.

7.16 Revealingly, if rather oddly, the RAF Leiston site is now described in more favourable terms, now being seen as well-screened, further from the Suffolk Coasts and Heaths AONB (National Landscape) and without access issues that could not be resolved through the SZC link road. The drawback now appears to be that the airfield is a non-designated heritage asset – the extent of the asset was established in Lionlink's cable route investigation, and it is very likely that accommodation could be made to preserve the airfield memorial site itself., the main part of the airfield administration section now being in use as a caravan park.

7.17 Under the heading Identification Of The Initial Preferred Option
Area C would also result in a significantly longer onshore cable route if landfall area of search S2 and the red corridor were selected. Area C was also constrained by the existing access. [APP-369, paragraph 4.3.48]

7.18 I dispute the assertion that there would be a significantly longer onshore cable route. As **Appendix 3** shows, the crow's flight distance from Site 4 to the consented Friston substation site is 3.69 kilometres whilst that from Site 3 to the same site is 1.60 kilometres. Thus, Site 3 is 2.09 kilometres closer.

7.19 It is understood that the shortest route possible reduces the cable length, which in turn reduces the manufacturing and installation cost as well as the environmental and security footprint. However, this single consideration must be weighed against other costs. Other than financial costs for the applicant, these costs include implications for the natural and built environments, the health and well-being of local residents and costs accrued to the local economy. On the Suffolk Coast, a significant concern relates to potential adverse impacts on tourism, the biggest single contributor to the local economy of this part of East Suffolk.

7.20 Preferred options, however, in this second stage of appraisal are Site 1, again, and Site 3, the latter not previously considered but originally a part of the Nautilus proposals. These preferences are resolved in the DCO application in favour of the larger ('less spatially constrained') and more flexible Site 3 at Saxmundham, although it is acknowledged that the land take will be larger and more HVAC cable will be required than for the alternate Site 1. Site 3 is good quality arable land. Its loss would be regrettable. In stark contrast, Site 4 is the only site that has been subject to scrutiny in the last two or three years that is a brownfield site.

7.21 **Appendix 4** shows the boundaries of Sites 4 and 3 and their relationship with Leiston and Saxmundham. It is based on the Ordnance Survey Landranger map 156, Saxmundham, Aldeburgh and Southwold.

7.22 Additionally, Site 4 has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter.

Converter site Area E is located to the south of Knodishall and is bounded to the east by the Suffolk Coast and Heaths AONB, the south by the A1094 Aldeburgh Road and the B1069 (Snape Road) runs southwest to northeast through the centre of the Area. There is a small area of Ancient Woodland at Great Wood located on the eastern edge of the Area and Grove Wood Ancient Woodland is located adjacent to the northwest corner of the Area. [APP-369, paragraph 4.3.18]

Whilst Area E was constrained at the landfall due to presence of terrestrial nature conservation sites, it was identified that trenchless installation methods could be used to reduce or avoid potential impacts. However, as further survey work was required to confirm the feasibility of using trenchless techniques at this landfall it was considered prudent to also progress an alternative. This alternative was landfall area of search S3N and a connection to converter site Area E via the purple corridor with a connection back to the network through the proposed Friston substation. [APP-369, para 4.3.50]

Area E was the preferred converter station area prior to the investigation of coordination, which is discussed below. [para 4.3.51]

Site 1 was contiguous with part of converter site Area E and offered good existing screening to the north of the site and good construction access to the strategic road network. It is close to the Suffolk Coast and Heaths AONB so setting was a consideration for this site. However, the site offered good opportunities for mitigation in keeping with the existing landscape character. This site also offered the shortest overall onshore cable route. [para 4.3.60]

Stakeholder Feedback And Option Refinement

National Grid has backchecked and reviewed all potential converter sites/Areas that were identified independently through both NGV's non-statutory consultation for the Nautilus Project[2] and the routeing and siting option appraisal for the Proposed Project described above. This backcheck and review considered whether it was feasible for any of the converter site Areas to accommodate up to three co-located converter stations and whether there were any additional sites that should be investigated/appraised further for co-location opportunities (this is described further in the next section). [4.3.67]

7.23 It is wholly inappropriate for National Grid to deploy evidence from a non-statutory consultation about Nautilus as a foundation for a completely different project.

Seven sites were identified as potentially offering opportunities for coordination, some of which aligned with the original converter station Areas identified for Sea Link, and some that had not been previously considered. These are illustrated on ***Figure 4.7: Potential Coordinated Converter Station Sites – Sheets 1 to 4 of Appendix A****.* [paragraph 4.3.69]

A summary of key considerations for each of the seven sites is illustrated ***Figure 4.7: Potential Coordinated Converter Station Sites – Sheets 1 to 4 of Appendix A*** *and is described in the following sections*. [4.3.70]

Site 1 *was contiguous with part of converter site Area E and offered good existing screening to the north of the site and good construction access to the strategic road network. It is close to the Suffolk Coast and Heaths AONB so setting was a consideration for this site. However, the site offered good opportunities for mitigation in keeping with the existing landscape character. This site also offered the shortest overall onshore cable route.* [4.3.71]

Site 4 was contiguous with part of converter site Area C and was located further away from the Suffolk Coast and Heaths AONB and offers good existing screening and ***additional screen planting could be developed in keeping with the existing landscape character****. Access to this site was challenging as it is accessed via small country roads; however,* ***Site 4 did have the benefit of the proposed new link road being developed as part of the proposed Sizewell C Nuclear Power Station albeit the cumulative impact with this development would be a consideration****. The site contains t****he former RAF Leiston Airfield, therefore this non-designated asset would need to be considered further if taken forward for development.*** [para 4.3.74]

7.24 It must be emphasised that Site 3 had not been examined or explored in detail as an option for Nautilus. It follows that this undermines its identification as the Preferred option site.

8.0 Saxmundham: Converter Site 3

Site 3 *was located further from the Suffolk Coast and Heaths AONB but in close proximity to the settlement of Saxmundham. There was good existing screening along the western and southern edges of the site, this along with the topography of the local area would limit the intervisibility between the settlement and the site. Access to this site is constrained and would need to be routed through the settlement of Saxmundham if taken off the B1119. An alternative opportunity does exist to take permanent construction access from the B1121. This would require construction of a permanent access route and a potential crossing of the River*

Fromus or the railway line. [paragraph 4.3.73]

8.1 Suffolk County Council in its detailed submission dated 29th May 2025 had the following to say about the proposed crossing of the river Fromus[7]:
The Council considers that the preferred access route, including the construction of a crossing over the River Fromus, provides a disproportionate solution to creating a permanent access to the converter station site. The proximity and proposed scale of the River Fromus crossing, its approaches and the resultant substantial and permanent loss of existing wooded vegetation would create significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). [paragraph 10]

8.2 I concur with Suffolk County Council about this being 'a disproportionate solution': Site 3 would entail the new access road and a substantial bridge (26 metres span and 4 metres high capable of taking up to 500 tonnes) over the River Fromus, with associated impacts on the market town of Saxmundham, with a population of circa 5,000, including, but not confined to:

- noise and vibration
- traffic
- flooding
- mental health and wellbeing
- socio-economic considerations
- tourism-based economy
- cultural heritage
- landscape and visual
- air quality
- fire risk
- national security

The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.' [paragraph 11]

The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the

[7] Please see **Appendix 5**

preferred access and considers that the Applicant has not conducted satisfactory engagement on this matter. [paragraph 12]

To make these proposals acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. However, very little detail is provided by the Applicant in this regard. [paragraph 13]

Appendix 1 – Detailed Technical Comments

Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment.
[paragraph 15]

It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'* [paragraph 16]

The Council also considers the proposals will also have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).
[paragraph 17]

8.3 Thus, the concerns identified by Suffolk County Council span a wide range of issues. Most importantly, that it proposes a disproportionate solution to creating permanent access to the converter station site that would create significant adverse impacts on designated and non-designated heritage assets caused by the permanent loss of existing wooded vegetation and cause harmful impact on landscape identified as an important rural approach to the town.

8.4 The County Council, in the single paragraph replicated below, provides the most potent argument against National Grid's selection of Site 3 as its Preferred converter site.

The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the preferred access and considers that the Applicant has not conducted satisfactory engagement on this matter. [paragraph 12]

8.5 Additional concerns identified by Suffolk County Council include:

- the adequacy of the Benhall railway bridge
- adverse impacts on heritage assets
- adverse impacts on landscape
- the possibility of adverse impacts on the water environment
- the consequential cumulative effects
- the need for good design.

8.6 The County Council's concerns will be shared by East Suffolk Council as its strategic priority to *Mitigate human impact on the environment and reduce contributions to climate change by conserving natural resources* cannot be delivered by the proposals as they stand.

8.7 A summary extract of the Representations of 29th May 2025 is at **Appendix 5.**

Suffolk Onshore Scheme preferred option

Following a backcheck of the initial preferred option for the Proposed Project and taking account of the appraisal findings of potential co-located options, ***Converter Site 1 and Site 3 were identified as emerging preferences for the Proposed Project and sites which could also accommodate co-location with other projects. Site 1 was in the originally preferred converter Area E,*** *whereas* ***Site 3 was a new site for the Sea Link project, having originally been identified by National Grid Ventures as part of the Nautilus site selection process.****Landfall S3N and the purple corridor remained an alternative option until further studies and survey work had been undertaken to determine the installation technique. However, this option could not facilitate a co-located landfall or terrestrial cable route to either Converter Site 1 or Site 3.* [4.3.87]

8.8 Saxmundham had a population of 4,106 in 2016 and 4,875 in 2022[8]. It is believed to be just over 5,000 now. As a sustainable urban settlement (with a railway station on the East Suffolk Line, ready access to the A12 and a good range of retail and community facilities), it is set to grow further.

8.9 To add to the concerns expressed by Suffolk County Council about the potential impacts on Saxmundham, the Suffolk Coastal Local Plan, adopted 23rd September 2020, contains Policy SCLP12.28: Strategy for Saxmundham. Its principle provisions are as follows:

[8] Suffolk Observatory, The Suffolk Office for Data and Statistics

Saxmundham will be enhanced as a market town, employment and service centre, serving a key role in meeting the needs of its residents, surrounding rural communities and visitors, recognising the opportunities related to the connections offered by the rail and A12 transport corridors.

The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for housing, employment and community facilities, focused around the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks.

8.10 The employment land will be located to the west of the A12 and will be masterplanned and delivered as part of the Garden Neighbourhood. It will include approximately 800 dwellings of a range of types, sizes and tenures including housing to meet the needs of older people, younger and vulnerable people, and provision of self-build plots, including affordable housing on site.

8.11 The South Saxmundham Garden Neighbourhood is very close to the proposed site access. Its location is shown on Local Plan Map 53 at **Appendix 6.**

8.12 In closing this section, amongst the many concerns I have about National Grid's late in the day identification of Site 3 as its Preferred converter site, the paramount concern is the disproportionate nature of its complex and damaging bridging 'solution' to its self-imposed problem.

8.13 Impacts on amenity of residents: Saxmundham 4,875 (2022) compared with Theberton village, approximately 211 (2021) (see paragraph 7.5) = x23. **Appendix 6** also shows the settlement boundaries of Theberton village (Local Plan Map 59).

8.14 Impacts of major development on residential amenity are unavoidable and regrettable. It is incumbent on any developer to seek to reduce impacts as much as possible, particularly if financial advantage accrues. Impacts would be much less with Site 4 than with Site 3, whilst I consider that Site 4 has cost advantages over Site 3.

9.0 LionLink

9.1 LionLink is a project by National Grid Ventures Ltd (NGV) to bring ashore power cables connecting the UK to the Netherlands. LionLink Interconnector announced on 19th February 2025 that the village of Walberswick had been selected as the preferred landfall location. It is referred to as 'Landfall G2'.

9.2 LionLink Interconnector stated[9]:

- *Shorter route to Walberswick will lower the overall environmental impact of the project and reduce disruption to residents.*

- *Underground cable: no construction will take place on Walberswick beach and there will be no visible infrastructure left on the beach or shoreline once works are complete.*

LionLink's proposed site plan for the Walberswick landfall includes two potential greenfield locations: the beach hut car park and Manor Field in the village centre.The plan involves burying interconnecting cables from the UK to the Netherlands, which would impact the beach, dunes, river, marshes, and protected lands around Walberswick.The project aims to bring offshore wind energy to the UK by connecting to a Dutch offshore wind farm and facilitating energy flow between the UK and Dutch electricity systems.

9.3 The crow's flight distance from Site 4 to the Walberswick Landfall G2 site is 12.46 kilometres. The crow's flight distance from Site 3 to the Walberswick Landfall G2 site is 15.06 kilometres[10]. Thus, Site 4 is 2.6 kilometres closer.

9.4 With reference to the respective distances to the Friston Substation related at paragraph 7.18 above, the overall cable trunking required for Site 4 is 0.51 kilometres less than that for Site 3. This is a not insignificant cost advantage in respect of Site 4.

9.5 Walberswick Against Lion Link ('WALL') maintains on its website:[11]
This will involve major construction work over a number of years in and around the village which will have a huge impact on the wildlife and the environmentally protected habitats that surround Walberswick, as well as on the residents and the economy of the village.

10.0 Conclusions

10.1 It is regrettable and additionally inexcusable that Site 4 was not considered in much more detail. National Grid had established its good credentials but waved it goodbye without a convincing explanation.

10.2 It is incumbent upon National Grid that it carries out a rigorous assessment of Site 4, with a view to it being designated as the Preferred Converter Site. It has numerous advantages which have been described above. Aside from the fact that it is a bit further from the consented Friston sub-station site than is the now

[9] Please see **Appendix 7**
[10] Please see **Appendix 8**
[11] https://www.wall-update.org/

Preferred Site 3, the benefits significantly outweigh the costs. The closer proximity of Site 4 to the Walberswick Landfall location produces an overall saving of 0.51km of cable trunking by Site 4 compared with Site 3.

10.3 Saxmundham was never included in the original site review and no justification or criteria have ever been provided for the selection of Site 3 as the Preferred Converter Site.

10.4 On the other hand, like the wider public I am mystified as to how Site 3 came to be the Preferred Converter site given its very late emergence as a contender. Suffolk County Council in its detailed representations of 29th May 2025 has, so far as I am concerned, clearly and comprehensively shown that Site 3 should be deselected.

10.5 A summary of the pros and cons of Site 4 relative to Site 3 as a converter location are:

PROS

1. Access will be easier with the SZC Link Road, there will be no expensive bridge to build to cross the River Fromus, a disproportionate solution to a self-imposed problem.
2. The Site 4 site will be a shorter cable route for LionLink from the Walberswick landfall location. The distance saving is 2.6 kilometres.
3. Less disruption to communities by a very significant factor.
4. The site was in use as an airfield between 1946 and 1965, with three concrete runways overlain with asphalt, so effectively has already been developed. It is the only brownfield site of the none converter sites examined.
5. It is large enough to accommodate the projects.
6. It offers good existing screening and additional screen planting could be developed in keeping with the existing landscape character.
7. Site 4 has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter
8. The combined cable route is 0.51km shorter with Site 4.

CONS

1. The cable route from Site 4 to the site of the consented Friston sub-station will be 2.09km longer.

10.6 EN-1 and EN-5 strongly support the general need for projects like Sea Link, giving substantial weight to energy security, decarbonisation, and system resilience.

10.7 EN-1 3.3.78 and EN-5 2.2.5–2.2.10 make it entirely appropriate for those, including SEAS, in objecting to this DCO, to argue:

- ❖ Sea Link is not the most efficient or economical solution.
- ❖ Other routes or locations (e.g. Tendring, Isle of Grain) could meet objectives with less environmental or heritage harm.

- ❖ The siting of substations and converter stations at Friston/Saxmundham is not inevitable—alternatives exist and should be properly considered.

10.8 There are so many issues with National Grid's proposals for Sea Link. These concerns are shared by me, Suffolk County Council and many others. It is reasonable to conclude that the application for the Development Consent Order is premature. It should be withdrawn so that National Grid can attend to the various procedures properly, as it should have done, and then supply the material required by various parties under a new application.

Appendices

one

Application by National Grid Electricity Transmission for an order granting development consent for the Sea Link project (EN020026)

A The documents taken into account include:

APP-007	3.1 Draft Development Consent Order
APP-041	6.1 Environmental Statement non-Technical Summary
APP-048	6.2.2.1 Part 2 Suffolk, Chapter 1, Landscape and Visual
APP-206	6.4.1.3 ES Figures Introduction Main Alternatives Considered
APP-320	7.2 Strategic Options Back Check Report
APP-368	8.1 Corridor and Preliminary Routing and Substation Siting Study (October 2022)
APP-369	8.2 Options Selection and Design Evolution Report (October 2023)
APP-370	68.3 Strategic Options Report (October 2023)

B Other documents consulted:

National Grid - Our Approach to Options Appraisal (2012)
Ofgem CION process note Issue 3 (2015)
National Grid's commitments when undertaking works in the UK (December 2016)
National Grid - Note on the assessment of options for the connection of ScottishPower Renewables East Anglia ONE North and East Anglia TWO offshore wind farms to the National Grid network (28th June 2018)
National Grid - Environmental Impact Assessment Scoping Report (Oct 2022)
Overarching National Policy Statement for Energy (EN-1) (DESNZ, April; 2023)
Sea Link Grid Reinforcement - Targeted Consultation on Changes to Sea Link Proposals
Suffolk County Council Response (August 2024)

National Grid – The Holford and Horlock Rules are guidelines used by National Grid for designing and siting infrastructure:

- The Holford Rules: provide guidelines for the routeing of high voltage overhead transmission lines. They were originally set out in 1959.
- The Horlock Rules: provide guidelines for, the design and siting of substations (in addition to cable sealing end compounds and line entries). They were established in 2009.

two

SCLP Policies to deliver Strategic Objective *Mitigate human impact on the environment and reduce contributions to climate change by conserving natural resources*

Policy SCLP3.1: Strategy for Growth

The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in the plan area by:

a) Supporting and facilitating economic growth through the supply of more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;
b) Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sqm of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;
c) Significantly boosting the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at least 542 new dwellings per annum (at least 9,756 over the period 2018 - 2036);
d) Ensuring the provision of infrastructure needed to support growth;
e) Protecting and enhancing the quality of the historic, built and natural environment across the District.

The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:

f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;
g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;
h) New employment allocations based around key transport corridors;
i) Strategies for market towns which seek to reflect and strengthen their roles and economies;
j) Appropriate growth in rural areas that will help to support and sustain existing communities.

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects

In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities.

The Council will work in partnership with the scheme promoter, local communities, National Grid, Government, New Anglia Local Enterprise Partnership, service providers, public bodies and relevant local authorities to ensure significant local community benefits and an ongoing legacy of the development is achieved as part of any Major Infrastructure Projects as outlined in Table 3.6.

Proposals for Major Energy Infrastructure Projects across the plan area and the need to mitigate the impacts arising from these will have regard to the following policy requirements:

a) Relevant Neighbourhood Plan policies, strategies and visions;
b) Appropriate packages of local community benefit to mitigate the impacts of disturbance experienced by the local community for hosting major infrastructure projects;
c) Community safety and cohesion impacts;
d) Requirement for a robust Environmental Impact Assessment
e) Requirement for a robust Habitats Regulations Assessment;
f) Requirement for a robust Heritage Impact Assessment;
g) Requirement for robust assessment of the potential impacts on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty;
h) Appropriate flood and erosion defences, including the effects of climate change are incorporated into the project to protect the site during the construction, operational and decommissioning stages;
i) Appropriate road and highway measures are introduced (including diversion routes) for construction, operational and commercial traffic to reduce the pressure on the local communities;
j) The development and associated infrastructure proposals will seek to deliver positive outcomes for the local community and surrounding environment;

k) Economic and community benefits where feasible are maximised through agreement of strategies in relation to employment, education and training opportunities for the local community;
l) Measures to ensure the successful decommissioning and restoration of the site through appropriate landscaping is delivered to minimise and mitigate the environmental and social harm caused during operational stages of projects;
m) Cumulative impacts of projects are taken into account and do not cause significant adverse impacts; and
n) Appropriate monitoring measures during construction, operating and decommissioning phases to ensure mitigation measures remain relevant and effective.

Policy SCLP3.5: Infrastructure Provision

The Council will work with partners including, Suffolk County Council, Parish and Town Councils, Suffolk Constabulary, Highways England, Environment Agency, Anglian Water, Essex and Suffolk Water, UK Power Networks and the Ipswich and East Suffolk Clinical Commissioning Group to ensure that the growth over the plan period is supported by necessary infrastructure in a timely manner.

Developers must consider the infrastructure requirements needed to support and service the proposed development. All development will be expected to contribute as necessary towards infrastructure provision to meet the needs generated.

Off-site infrastructure will generally be funded by the Community Infrastructure Levy. On-site infrastructure will generally be secured and funded through section 106 planning obligations.

Development will be expected to contribute to the delivery and enhancement of infrastructure which encourages active lifestyles and healthy communities, through on site provision where appropriate to the scale and nature of development and through CIL contributions. Open space should be provided on new residential development sites to contribute to the provision of open space and recreational facilities to meet identified needs, in accordance with Policy SCLP8.2.

In locations where there is inadequate capacity within local catchment schools development should contribute to the expansion or other measures to increase places available at the school. Where new primary schools are provided these should be in locations which are well located in relation to the catchments they will serve, and which maximise opportunities for walking and cycling to school.

Development adjacent to existing schools should not compromise the ability of schools to expand to an appropriate size in the future.

Development will be expected to follow the principles of Holistic Water Management as set out in Policy SCLP9.7 and will not be permitted where it would have a significant effect on the capacity of existing water infrastructure. Specifically, developers should provide evidence to ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development. Where there is insufficient capacity in the water recycling centre, Anglian Water will review the requirements for investment and development will need to be phased, where necessary, in order to allow time for improvement works to take place, if required. The improvements shall ensure there is no breach of environmental legislations particularly in relation to the Water Framework Directive and Habitats Regulations Directive or subsequent replacements.

Development should not be permitted where the electricity supply network cannot accommodate it. Particular regard should be had to large scale employment sites, which are regarded as particularly energy intensive development. The Council will work with UK Power Networks to ensure that development proposed in this Local Plan does not conflict with the electricity supply network.

The Council will work with the digital infrastructure industry to maximise access to super-fast broadband, wireless hotspots and improved mobile signals for all residents and businesses. All new developments must provide the most viable high-speed broadband connection. Infrastructure relating to new developments should be designed so as not to impede or obstruct connection to antennae or masts in the local vicinity. Early engagement with the relevant digital infrastructure provider should be undertaken to avoid such a scenario.

To support the provision of waste management infrastructure, where the size of the development allows for it 'bring sites' should be included in the design and layout of developments to encourage recycling measures and to reduce the demand on Household Waste Recycling Centres.

Policy SCLP7.1: Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.

Development will be supported where:

a) Any significant impacts on the highways network are mitigated;
b) It is proportionate in scale to the existing transport network;
c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;
d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;
e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
h) The cumulative impact of new development will not create severe impacts on the existing transport network.

Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth.

Opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.

Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for:

i) New large scale employment sites;
j) Residential development of 80 or more dwellings; and

k) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or road network.

In consultation with the Highway Authority, the scale, location and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non-residential development will be considered on a case by case basis dependent on the volume of movements anticipated with the use proposed.

Policy SCLP9.1: Low Carbon & Renewable Energy

The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below:

a) They can evidence a sustainable and, ideally, local source of fuel;
b) They can facilitate the necessary infrastructure and power connections required for functional purposes; and
c) They are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, the natural beauty and special qualities of the AONB, transport, flora and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria. Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan.

When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition.

Policy SCLP9.2: Sustainable Construction

All new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. Exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.

All new residential development in the plan area should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day. The use of locally sourced, reused and recycled materials, along with on-site renewable energy generation are encouraged in order to achieve environmental net gain in new build or conversion developments. Development proposals are also encouraged to set out measures for minimising waste arising from the construction process.

All new non-residential developments of equal or greater than 1,000sqm gross floorspace are required to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.

Proposals should improve the efficiency of heating, cooling and lighting of buildings by maximising daylight and passive solar gain through the orientation of buildings.

Policy SCLP9.5: Flood Risk

The Strategic Flood Risk Assessment should be the starting point in assessing whether a proposal is at risk from flooding.

Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios (taking climate change into consideration).

This should address as a minimum: finished floor levels; safe access and egress; an emergency flood plan; identification and provision of surface water exceedance routes; flood resilience/resistance measures; any increase in built or surfaced area; and any impact on flooding elsewhere, including sewer flooding.

Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere. In this respect, single storey residential developments will not be permitted in areas of high risk of flooding within or outside Settlement Boundaries.

Developments are encouraged to include natural flood management measures that complement existing flood defences if pre-existing flood defences are in place, in the interests of integrated flood management.

Any new flood risk measures that result in significant depreciation of natural capital will be required to create compensatory natural capital.

Neighbourhood Plans can allocate land for development, including residential development, in areas at risk of flooding providing it can be demonstrated:

a) There are no alternative available sites appropriate for the proposed use within the Neighbourhood Area;
b) The development provides sustainability benefits which outweigh flood risk; and
c) Evidence is provided that it is possible for flood risk to be mitigated to ensure development is safe for its lifetime and the lifetime of the relevant flood defence.

Policy SCLP9.6: Sustainable Drainage Systems

Developments should use sustainable drainage systems to drain surface water. Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sqm of floorspace or on sites of 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Sustainable drainage systems should:

a) Be integrated into the landscaping scheme and green infrastructure provision of the development;
b) Contribute to the design quality of the scheme; and
c) Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as Source Protection Zones.

Runoff rates from new development must be restricted to greenfield runoff rates wherever possible.

Where a site is previously developed, the proposed runoff rates should be restricted as close to the greenfield rates, or at the very minimum a betterment of at least 30% should be considered over the brownfield runoff rates.

No surface water connections should be made to the foul system and connections to the combined or surface water system should only be made in exceptional circumstances where there are no feasible alternatives. Foul and surface water flows should also be separated.

Policy SCLP9.7: Holistic Water Management

All development will be expected to demonstrate that water can be made available to support the development and that adequate foul water treatment and disposal already exists or can be provided in time to serve the development. Development will be phased to allow water and water recycling infrastructure to be in place where needed.

All new developments will be expected to incorporate water efficiency and re-use measures to maximise the opportunities to reduce water use. This includes, but is not limited to:

a) Grey water recycling;
b) Rainwater harvesting; or
c) Water use minimisation technologies.

Infrastructure that leads to a reduction in the amount of water released to the sewer system and allows for natural infiltration into groundwater tables will be favoured in this instance.

Policy SCLP10.3: Environmental Quality

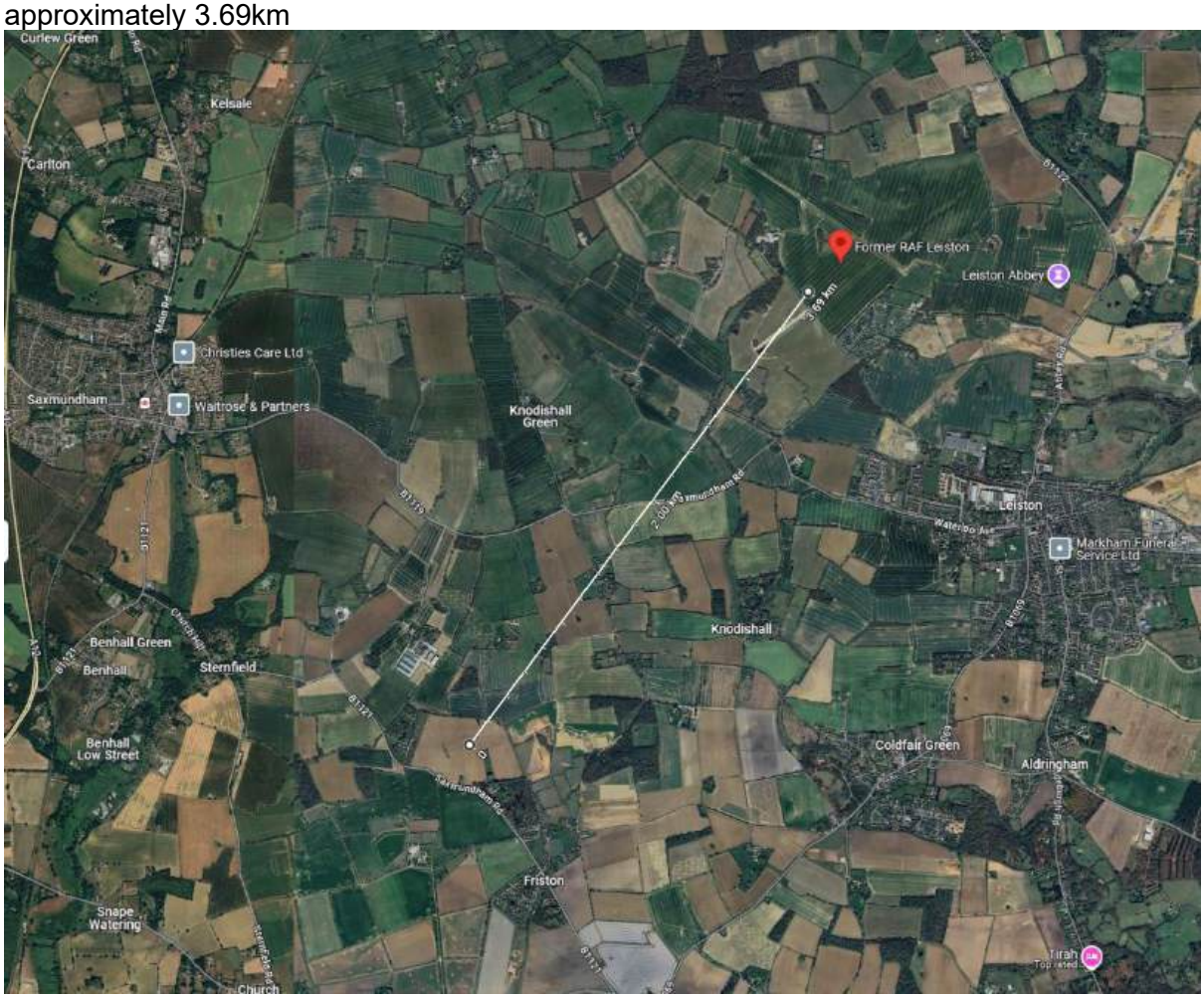
Development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination. Development proposals will be considered in relation to impacts on;

a) Air quality, and the impact on receptors in Air Quality Management Areas;
b) Soils and the loss of agricultural land;
c) Land contamination and its effects on sensitive land uses;
d) Water quality and the achievement of Water Framework Directive objectives;
e) Light pollution; and
f) Noise pollution.

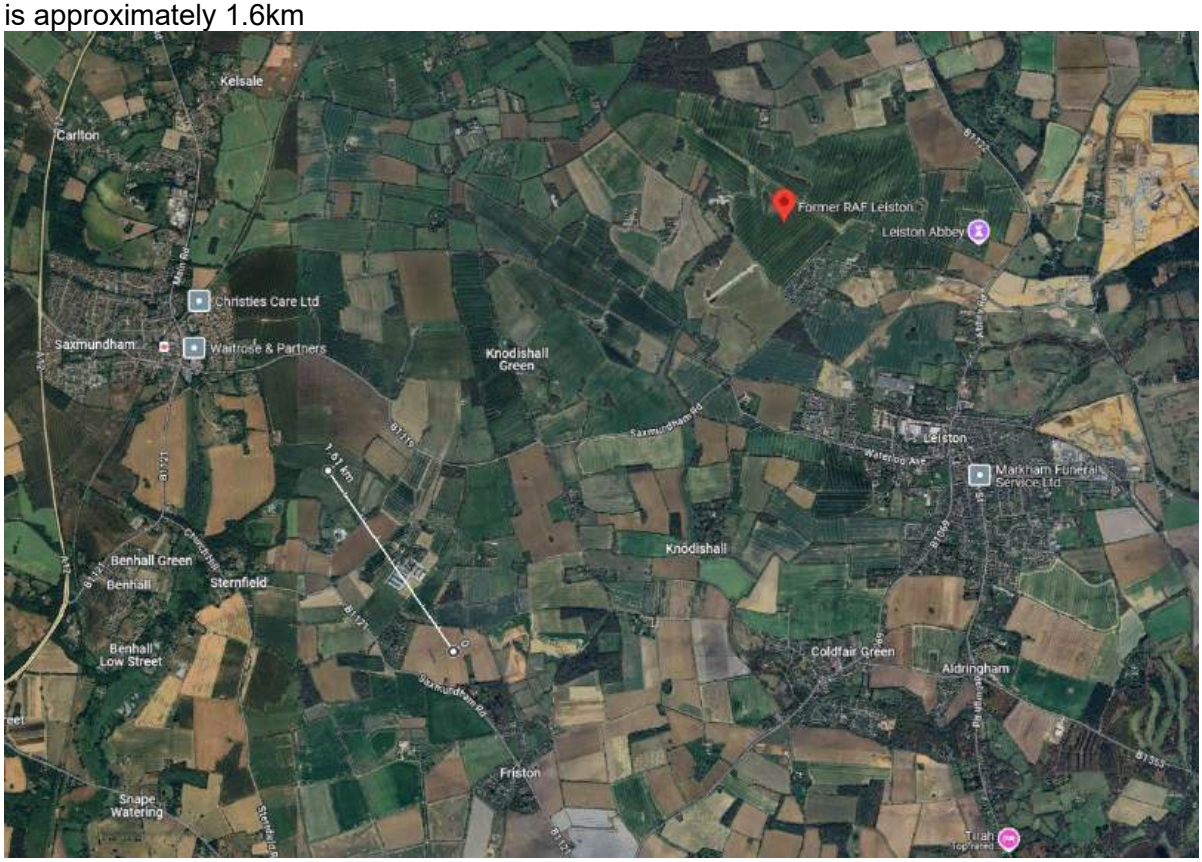
Proposals should seek to secure improvements in relation to the above where possible. The cumulative effect of development, in this regard, will be considered.

three

The distance from Converter Site 4 to the consented Friston Sub-station site is approximately 3.69km

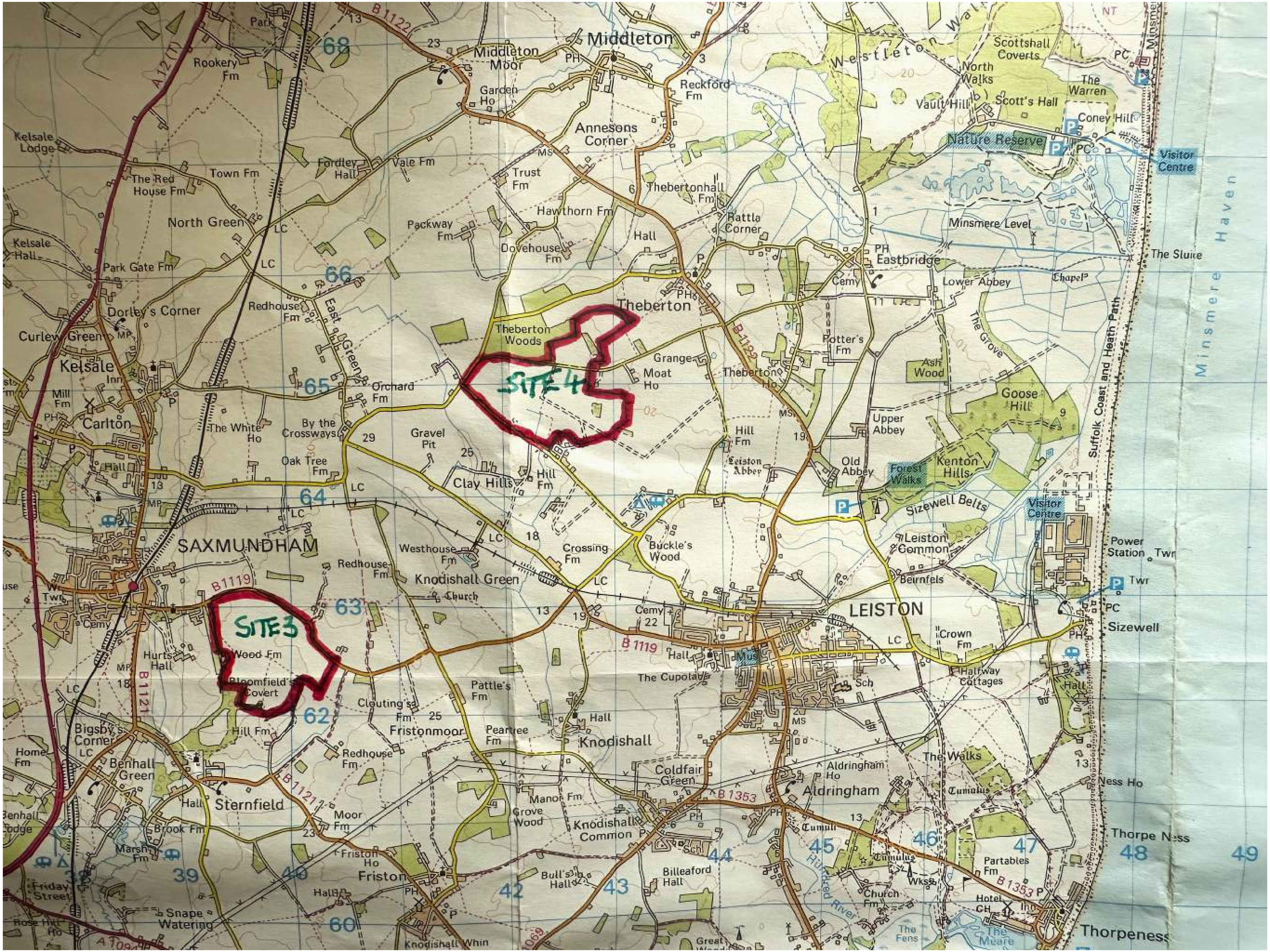


The distance from the preferred Converter Site 3 to the consented Friston Sub-station site is approximately 1.6km



Courtesy of Gordon Young BSc MA RIBA ARB, SEAS member

four


SITE 4
SITE 3
Middleton
Middleton Moor
Westleton Walks
Scottshall Coverts
North Walks
The Warren
Vault Hill
Scott's Hall
Coney Hill
Nature Reserve
Visitor Centre
Minsmere Level
Minsmere Haven
The Sluice
Eastbridge
Lower Abbey
Chapel
The Grove
Garden Ho
Reckford Fm
Annesons Corner
Kelsale Lodge
Fordley Hall
Vale Fm
Trust Fm
Town Fm
The Red House Fm
Thebertonhall Fm
Rattla Corner
Hawthorn Fm
North Green
Packway Fm
Dovehouse Fm
Hall
Kelsale Hall
Park Gate Fm
Redhouse Fm
East Green
Theberton
Dorley's Corner
Curlew Green
Kelsale
Theberton Woods
Grange
Moat Ho
Potter's Fm
Theberton Ho
Ash Wood
Goose Hill
Orchard Fm
Carlton
The White Ho
By the Crossways
Gravel Pit
Hill Fm
Leiston Abbey
Upper Abbey
Old Abbey
Forest Walks
Kenton Hills
Suffolk Coast and Heath Path
Oak Tree Fm
Clay Hills
Sizewell Belts
Visitor Centre
SAXMUNDHAM
Westhouse Fm
Crossing Fm
Buckle's Wood
Leiston Common
Power Station
Twr
Redhouse Fm
Knodishall Green
Church
Beirnfels
LEISTON
Sizewell
Crown Fm
Hurts Hall
Wood Fm
Bloomfield's Covert
The Cupola
Halfway Cottages
Pattle's Fm
Clouting's Fm
Fristonmoor
Peartree Fm
Knodishall
Hill Fm
Bigsby's Corner
Home Fm
Benhall Green
Redhouse Fm
The Walks
Aldringham Ho
Coldfair Green
Aldringham
Ness Ho
Cumulus
Sternfield
Manor Fm
Grove Wood
Moor Fm
Knodishall Common
Benhall Lodge
Brook Fm
Tumuli
Thorpe Ness
Marsh Fm
Friston Ho
Partables Fm
Friday Street
Friston
Bull's Hall
Billeaford Hall
Hundred River
Church Fm
Wkss
Snape Watering
Hotel
Rose Hill Ho
Knodishall Whin
The Fens
The Meare
Thorpeness
A12(T)
B1122
B1119
B1121
B1353
B1069
A1094
68
66
65
64
63
62
60
39
40
42
43
44
45
46
47
48
49

five

Date: 29 May 2025 Enquiries to: Roly Arbon Email: nsips@suffolk.gov.uk

Suffolk County Council

Introduction

The Council recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed [paragraph 1]

The Council considers that solutions to several key issues were not sufficiently explored during the pre-application stage, and it is presently unclear how these issues will be resolved and what further information may be needed to demonstrate the deliverability and acceptability of any solutions, and, as such, NGET's submission of an application for Development Consent for its proposed Sea Link project has been made prematurely and in a manner that will put undue pressure on the Examination process. [paragraph 2]

A significant number of issues, which could have been addressed through more thorough engagement, will need to be resolved during the six-month Examination, which the Council considers unacceptable because there is no assurance that satisfactory solutions can be achieved within the parameters of the application and this increases risks to the overall deliverability of the proposals. [paragraph 3]

Significant Issues

Access Route – Benhall Railway Bridge, B1121

While the Applicant has considered some options, which could themselves have impacts in transport terms, the Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121, a Council asset which forms part of the access route selected by the Applicant to the converter station site. The Council considers that there has not been a sufficient review of access options. [paragraph 6]

River Fromus Crossing

The Council considers that the preferred access route, including the construction of a crossing over the River Fromus, provides a disproportionate solution to creating a permanent access to the converter station site. The proximity and proposed scale of the River Fromus crossing, its approaches and the resultant substantial and permanent loss of existing wooded vegetation would create significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II Listed Building).* [paragraph 10]

The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to

Saxmundham reinforcing its setting within the Fromus valley.'
[paragraph 11]

*The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the preferred access and considers that the Applicant has not conducted satisfactory engagement on this matte*r. [paragraph 12]

To make these proposals acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. However, very little detail is provided by the Applicant in this regard.
[paragraph 13]

Converter station site design

The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. [paragraph 14]

Cumulative Effects

The Council is also concerned about cumulative impacts on the road network and expects the proposals to contribute to significant effects with regards to traffic on the routes leading to, and in proximity to, the Suffolk Coast (and subsequent impacts on air quality, noise, and vibration), local housing, services, and labour supply. For example, use of the preferred access route to the converter station site via the B1121 could significantly impact communities to the south of Saxmundham, including Benhall and Sternfield, that rely on the town for shops and services. [paragraph 31]

Given that it is likely that the construction periods for Sea Link and LionLink will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at Saxmundham and the substation at Friston for both Sea Link and LionLink are laid at the same time will help to reduce the cumulative impacts on the local community and environment. [paragraph 37]

Appendix 1 – Detailed Technical Comments

Detailed comments of the Council's technical departments are provided in the following paragraphs. [paragraph 1]

Good design

The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. [paragraph 7]

Converter Station site

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 had 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 current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119. [paragraph 8]

There are a number of listed buildings within the vicinity of the converter station site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting. [paragraph 9]

The Applicant added additional potential work compound areas around the proposed Saxmundham Converter Station site to the DCO limits during the pre- engagement consultation that ended in January 2025. The Council considers that the added flexibility sought by the Applicant results in greater vagueness of the scheme and greater uncertainty. [paragraph 11]

River Fromus crossing

Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment. [paragraph 15]

It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'* [paragraph 16]

The Council also considers the proposals will also have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023). [paragraph 17]

The Council welcomes the change in layout of the Fromus crossing to avoid veteran trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, the Church of St John the Baptist, and Hurts Hall. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would

need to be of outstanding quality, and harmonise with its setting; however, very little is provided by the Applicant in this regard. [paragraph 18]

Cultural Heritage

The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and LionLink at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area. [paragraph 38]

Water Environment

National mapping for the converter station site area suggests soils have poor properties for infiltration. Therefore, the Council, as Lead Local Flood Authority ("LLFA"), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network. [paragraph 47]

The Council is not content with the Applicant's assessment of flood risk in Friston. [paragraph 54]

The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, in particular the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to an ultimate viable discharge point. [paragraph 56]

Traffic and Transport

As Local Highway Authority ("LHA"), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on roads used for recreational purposes and the uninterrupted impacts on local communities. The application appears conflicted stating that HGV deliveries will not be permitted on Sundays and Bank Holidays but then placing a limit of 30 HGV movements for a list of allowable construction activities. [paragraph 76]

The Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are:

- *The preferred access route to the converter station site via the B1121 on communities to the south of Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield.*

- *The centre of Saxmundham that is constrained by a historic crossroad layout.*
- *B1121 through Sternfield to Friston which has pinch points and bends.*
- *The landfall site which is constrained with regards to access as the surrounding roads are unsuitable for HGVs and AILs including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.*
- *The A1094 due to the superimposing of SPR EA1N, EA2 and Sizewell C (non-HGV) traffic.* [paragraph 80]

The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits. Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. With the current restrictions this route would not be resilient for long term access to the Saxmundham converter station site and the Council considers there are serious concerns regarding deliverability. [paragraph 86]

Health and Wellbeing

The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to. [paragraph 122]

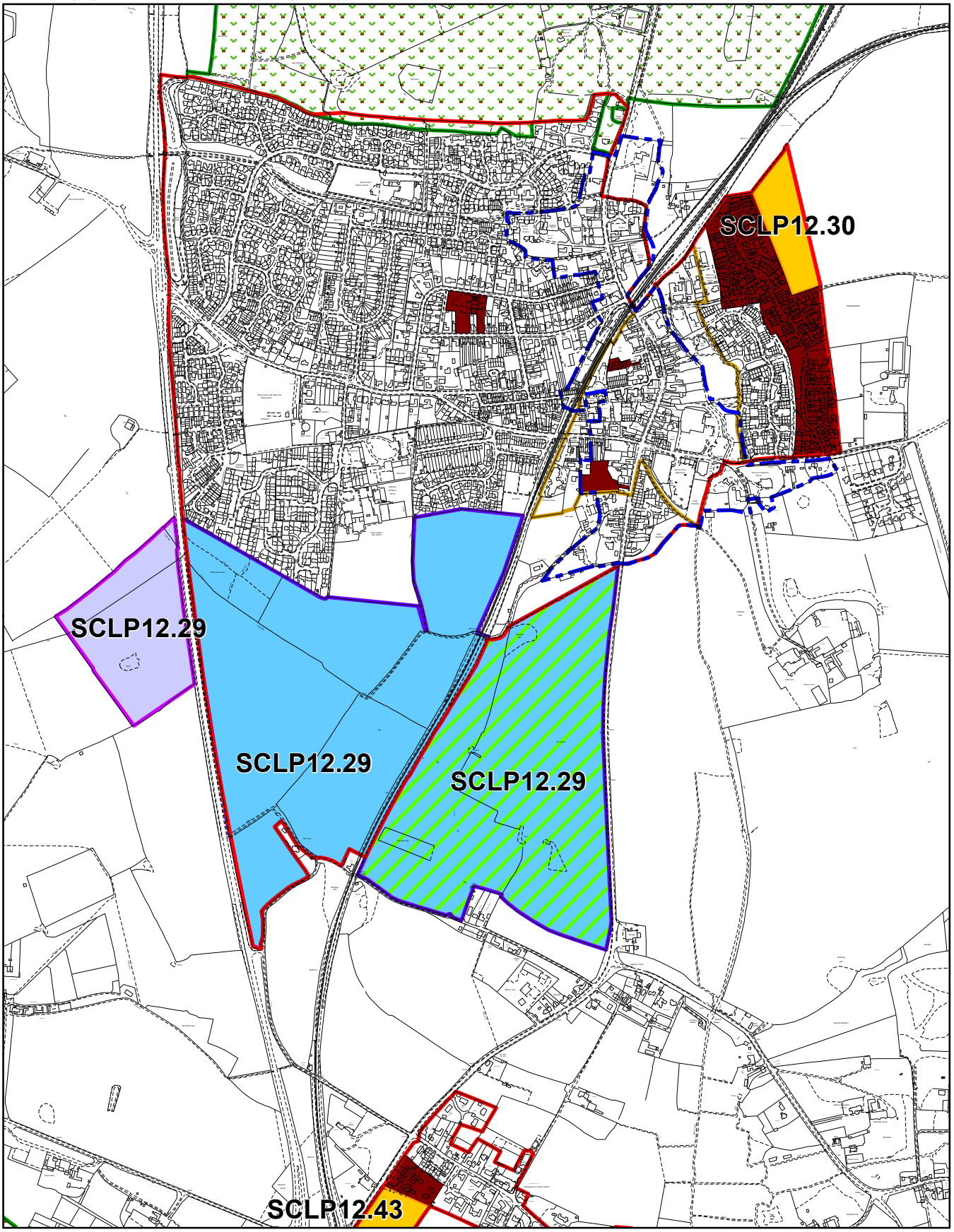
six

EASTSUFFOLK COUNCIL

Suffolk Coastal LOCAL PLAN

Covering the former Suffolk Coastal District area
Adopted 23 September 2020

Policies Maps



Key

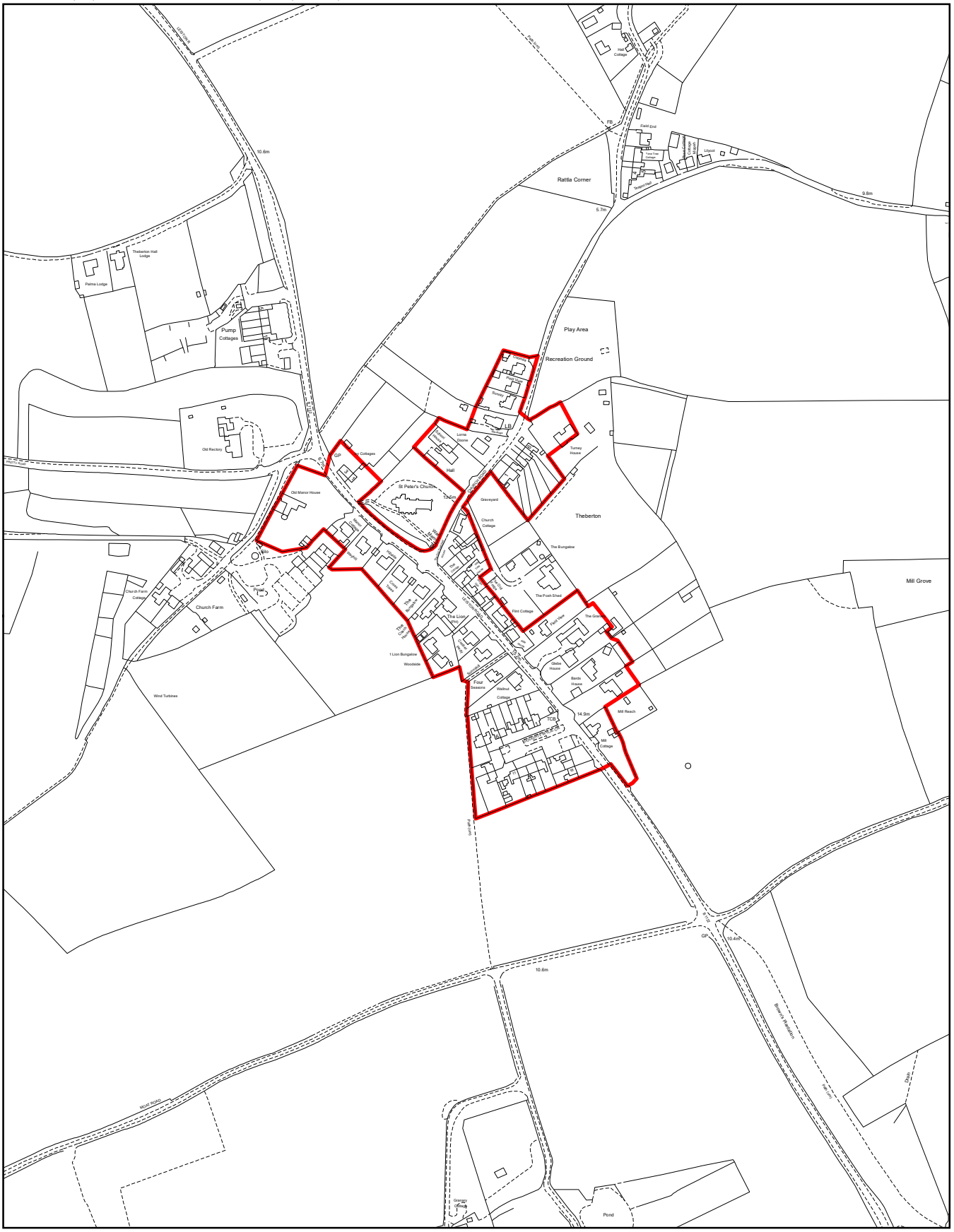
- SCLP3.3 Settlement Boundaries
- SCLP4.9 Development in Town Centres
- SCLP11.5 Conservation Areas
- SCLP11.8 Historic Parks & Gardens
- Housing Allocation
- Employment Allocation
- Mixed Use Allocation
- Open Space / SANG / Existing Uses Allocation
- Housing Permissions as at 31/03/18

Also see town centre Inset Map

53 - Saxmundham

East Suffolk Council

Scale 1:11,500



Key SCLP3.3 Settlement Boundaries

59 - Theberton

East Suffolk Council

Scale 1:5,000

seven

LionLink interconnector announces Walberswick as preferred landfall location

19th February 2025
NGV

- **Shorter route to Walberswick will lower the overall environmental impact of the project and reduce disruption to residents.**
- **Underground cable: no construction will take place on Walberswick beach and there will be no visible infrastructure left on the beach or shoreline once works are complete.**
- **LionLink will strengthen the UK's energy security and lower household bills.**

Today (Wednesday 19 February), LionLink interconnector announces Walberswick as the preferred landfall location for the new subsea interconnector between the UK and the Netherlands*.

Why Walberswick?

The decision to select Walberswick as the preferred landfall location follows extensive environmental and technical analysis and two community consultations. Key reasons for this choice include**:

- **Lower environmental impact**: The overall environmental impact of the project will be less at Walberswick. Fewer heritage trees, hedgerows and waterways will be affected by the route.
- **Reduced disruption for residents**: The shorter route will reduce traffic disruption. By using existing farm tracks for access, local roads can be avoided to minimise the impact on Walberswick.
- **Sustainability**: Walberswick is less susceptible to coastal erosion and flooding, making it a more sustainable option for the long-term operation of LionLink.

- **Shorter onshore cable route**: The Walberswick site requires a shorter onshore cable route (19.9 km) compared to the Southwold route (32.8 km). This will reduce the environmental impact and disruption to residents.

Ben Wilson, President of National Grid Ventures, said: "After two rounds of community consultation and detailed technical and environmental assessments, we have selected Walberswick as our preferred landfall site for LionLink. Community feedback has been essential to the evolution of LionLink. We have carefully chosen Walberswick for its shorter cable route, which will minimise disruption and environmental impact. Our commitment is to respect and protect the local environment and community, while we deliver a nationally important energy project that will strengthen the UK's energy security.

"We understand that people may have questions about the impact of this decision on their community. We are dedicated to engaging with residents, addressing their concerns, and providing clear information about how we will minimise disruption to their daily lives and the natural environment when we build this project. We look forward to hearing their views at the next public consultation at the end of the year."

LionLink is a vital first step towards an integrated North Sea Grid. It will be the first time that an interconnector links to an offshore windfarm at scale as well as enabling the transfer of energy between the UK and Dutch electricity grids. This means fewer connections from the sea to the land and less impact on coastal communities.

LionLink will bring renewable offshore wind energy to the UK and connect the Dutch and UK energy grids, enhancing the UK's energy security and lowering household bills. 84% of LionLink's cable is offshore and all of the onshore cable will be buried underground.

Benefits of LionLink

- **Strengthening energy security**: LionLink will power approximately 2.5 million homes.
- **Lowering energy bills**: LionLink will save consumers £300 million in its first ten years of operation.
- **Environmental impact**: LionLink will reduce carbon emissions equivalent to removing 600,000 cars from the road in its first year.

Next steps

- **Community drop-ins**: in March, LionLink is running two community drop ins and an online webinar for local people to find out more about the landfall decision and the next steps of the project.***
- **Consultation**: LionLink's statutory consultation will happen in Autumn/Winter 2025. This will provide local people with details on LionLink's final proposals, environmental findings, and community benefits. This is the next opportunity for people to feedback on our plans.
- **Development Consent Order (DCO):** LionLink expects to submit its DCO to the Planning Inspectorate (PINS) in 2026. A decision on the application is expected in 2027
- **Operation:** LionLink expects to be in operation from 2032.

Notes to editors

***What is a landfall location?**

A landfall site is the location where the subsea cables are brought onto the land underground and are connected to onshore underground cables. No construction will take place on Walberswick beach and there will be no visible infrastructure left on the beach or shoreline.

****Landfall selection process**

LionLink's selection of the Walberswick landfall site has involved a comprehensive, multi-step process.

Initial site feasibility (2018-2022)

- Identified potential onshore infrastructure locations considering environmental and technical factors.
- Resulted in a shortlist of viable landfall sites for further study.

First public consultation (late 2022)

- Consulted on initial siting and routing options, including Walberswick, Southwold, Aldeburgh, and Dunwich.
- Community feedback led to identifying Walberswick (G2) as an alternative landfall site and a new cable corridor north of Southwold.

Second public consultation (late 2023)

- Focused on the alternative Walberswick site (G2) and Southwold cable route, along with 2022 options.

Shortlisted locations announced (March 2024)

- Walberswick and Southwold announced as preferred shortlisted locations.
- Non-Statutory Consultation Report summarising feedback and emerging preferences published.

Seabed surveys (Spring/Summer 2024)

- Conducted surveys off Walberswick and Southwold to assess offshore routes to the Dutch wind farm.

Ground Investigation surveys (Summer/Autumn 2024)

- Carried out surveys along the proposed cable route to Walberswick and Southwold landfall sites.

Preferred Option Selection (February 2025)

- Walberswick selected as the preferred landfall site after thorough evaluation.

* nLink will be hosting a series of community drop-ins and a webinar. These are not consultation events, but an opportunity to learn more about the project and meet LionLink's team of

experts ahead of our formal statutory consultation expected to take place in Autumn/Winter 2025. This consultation is the next opportunity the community will have to feedback on the plans for LionLink.

Event Type	Date	Time	Location/Access
In-person drop in	14 March 2025	14:00 – 20:00	Saxmundham Market Hall
In-person drop in	15 March 2025	10:00 – 16:00	Walberswick Village Hall
Webinar	19 March 2025	18:00 – 19:30	Register via the website (see below)

People can register to attend the webinar here: nationalgrid.com/lionlink

For media enquiries contact:

[redacted]

[redacted]@nationalgrid.com

[redacted]

About LionLink

National Grid Ventures (NGV) is developing plans to build LionLink, a new subsea cable (known as an interconnector) between the UK and the Netherlands. LionLink will bring offshore wind energy to the UK by connecting to a Dutch offshore wind farm, it will also enable the flow of energy between the UK and Dutch electricity systems.

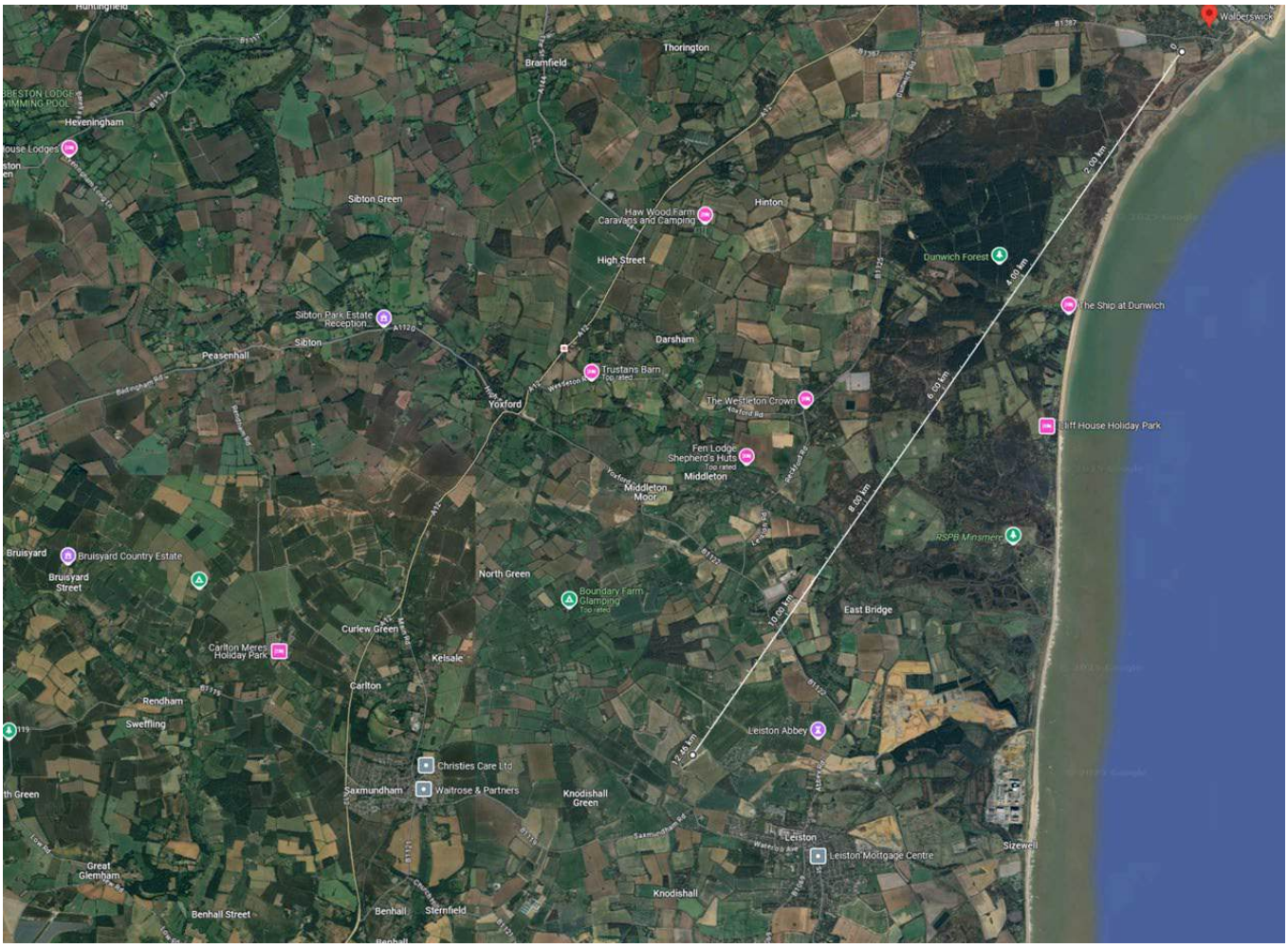
LionLink will add enough energy to the UK's electricity grid to power c.2.5million homes. It will help lower household energy bills down and provide the UK with a secure and reliable energy supply.

About National Grid Ventures

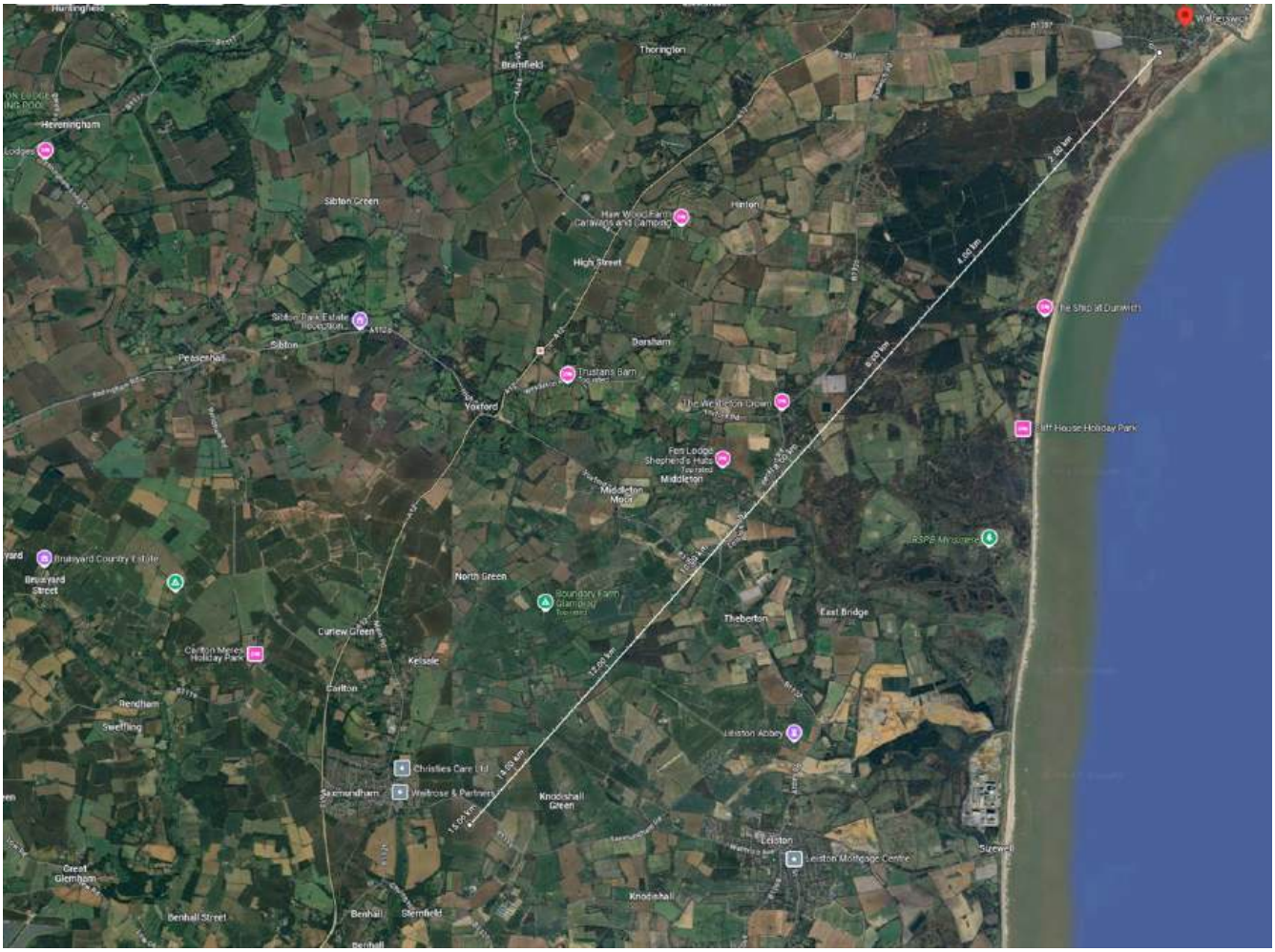
National Grid Ventures operates outside of National Grid's core regulated businesses in the UK and US where it develops, operates and invests in energy projects, technologies and partnerships to accelerate the development of our clean energy future.

National Grid Ventures operates a diverse portfolio of energy assets across the UK and US, including subsea electricity interconnectors, competitive transmission, wind and solar generation, battery storage and LNG storage and regasification.

eight



The crow's flight distance from Converter Site 4 to the Walberswick Landfall Site is 12.46km



The crow's flight distance from Converter Site 3 to the Walberswick Landfall Site is 15.06km

Courtesy of Gordon Young BSc MA RIBA ARB, SEAS member