The Planning Act 2008

Application by National Grid Electricity Transmission for the Sea Link Project

East Suffolk Council's Comments on the Applicant's Deadline 1 and Deadline 1A Submissions

Deadline 2
(9 December 2025)

Application Ref.: EN020026

East Suffolk Council: [redacted]

1. Introduction

1.1 East Suffolk Council (ESC) has reviewed the Applicant's submissions at Deadline 1 and Deadline 1A, and its comments are provided in the subsequent sections of this document.

2. ESC's comments on 'Document 9.44: St John's Church Grade II* Listed Building' (Version A) [REP1-118]

2.1 At Paragraph 6.3.6.4 of its Local Impact Report [REP1-128], ESC noted that the Chapter 3 (Cultural Heritage) of the Environmental Statement ('ES') [APP-050] combines the assessment of the Saxmundham Conservation Area and that of St John the Baptist's Church. ESC considers that the effects on the Church should be assessed separately.

2.2 ESC therefore welcomes the Applicant's submission of a technical note providing an assessment of the effects on the Grade II* Listed Church of St John the Baptist as an individual heritage asset.

2.3 In Paragraph 6.3.6.2 of its Local Impact Report, ESC assessed that the residual effect of the proposed Saxmundham Converter Station and River Fromus bridge on the St John the Baptist's Church (Grade II* Listed) would be minor adverse.

2.4 ESC has reviewed the Applicant's Assessment [REP1-118] and the additional River Fromus visualisations ([REP1-121], [REP1-298], [REP1-299], and [REP1-300]). ESC notes that Paragraphs 4.1.3 and 4.1.4 of the Assessment found that *"with the additional mitigation measures in place, including screening planting the residual effect would reduce to neutral (by year 15 of operation), which is not significant"*, resulting in *"no harm to the heritage asset"*. Whilst this differs to the assessment ESC provided in its LIR, having reviewed the submitted information, ESC agrees with the Applicant's assessment of the residual effects of the proposed Saxmundham Converter Station and River Fromus bridge on St John's the Baptist's Church.

2.5 ESC requests that Chapter 3 (Cultural Heritage) of the ES [APP-050] is amended to include this further assessment.

3. ESC's comments on 'Document 7.11.1 Design Approach Document – Suffolk' (Version B) [REP1A-029]

3.1 ESC has reviewed the Design Approach Document – Suffolk (Tracked Changes) [REP1A-030] submitted by the Applicant at Deadline 1A.

3.2 ESC considers that the converter station design approaches that have been explored work in tandem with the Design Principles [APP-366] and provide suitable options for the eventual design of the converter station.

3.3 The design approaches for the River Fromus bridge have been developed through pre-consultation discussions and ESC considers that the chosen approaches are well-considered.

3.4 ESC is concerned, however, that the height of the River Fromus bridge has not been confirmed. The differences between the visual impacts of the lowest option (soffit at 4m from Q95 flow level) and the highest option (soffit at 6m from Q95 flow level) are significant, and so ESC would urge the Applicant to confirm the bridge height as early as practicable.

4. ESC's comments on 'Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity' (Version C) [REP1-047]

4.1 ESC has reviewed the Tracked Changes Version C of Part 2 Suffolk Chapter 2 – Ecology and Biodiversity of the ES [REP1-048] submitted by the Applicant at Deadline 1.

4.2 Paragraph 2.9.8 provides further detail in relation to the method to be used to retrieve equipment in the event it gets stuck. ESC acknowledges this additional wording but has no comment to make.

4.3 The Applicant considers that there would be a moderate beneficial long-term (significant) impact on dormice due to habitat creation provided by the proposed landscape planting around the Saxmundham Converter Station and Friston Substation, despite the very same paragraph (Paragraph 2.9.192) acknowledging that *"there is no evidence of dormouse within the operational footprint of the Suffolk Onshore Scheme"*. ESC queries this finding and considers that the proposed landscape planting cannot be of benefit to a species which is claimed to be absent. ESC considers that this benefit should be downgraded to 'negligible' (i.e. 'not significant') if the project maintains that the species is absent from these sites. The corresponding row of Table 2.11 should also be updated to reflect this.

5. ESC's comments on 'Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC)' (Version B) [REP1-102]

5.1 ESC has reviewed the Tracked Changes Version B of Appendix B to the Construction Environmental Management Plan (CEMP) – Register of

Environmental Actions and Commitments (REAC) [REP1-103] submitted by the Applicant at Deadline 1.

5.2 ESC requests that mitigation measures B60 and B63 in Table 1.2 of the updated REAC include East Suffolk Council in the list of organisations to be notified.

6. ESC's comments on 'Document 9.50: Cumulative Vehicles Emissions Assessment' (Version A) [REP1-123]

6.1 ESC has reviewed the Cumulative Vehicle Emissions Assessment [REP1-123] submitted by the Applicant at Deadline 1.

6.2 ESC is content that the revised air quality modelling results presented in Section 2.3 of the Assessment, whilst higher than the original modelling results, remain well below national objective levels for both particulates and nitrogen dioxide. ESC therefore has no further comments to provide at this stage, noting the commitments made by the Applicant in relation to HGV emissions standards.

6.3 ESC wishes to note that should changes to forecast traffic levels be made over the course of the Examination, an updated air quality assessment may be required.

7. ESC's comments on 'Document 6.2.4.1: Part 4 Martine Chapter 1 Physical Environment' (Version C) [REP1-051]

7.1 ESC has reviewed the Tracked Changes Version C of Part 4 Marine Chapter 1 – Physical Environment of the ES [REP1-052] submitted by the Applicant at Deadline 1. ESC's comments are provided in the following paragraphs. These comments, many of which do not relate specifically to amendments made to this ES Chapter at Deadline 1, supplement those already provided by ESC in its Local Impact Report [REP1-128].

7.2 Paragraph 1.7.2 states that the Aldeburgh defence wall *'is situated at the back of the beach and at the time of inspection was largely buried by shingle (Royal Haskoning, 2010).'* ESC considers that this statement, based on an inspection carried out 15 years ago, is out of date as the Aldeburgh seawall is exposed in places, which has caused some concern locally. ESC therefore suggests that this statement is removed or amended based on a more recent inspection of the frontage. ESC wishes to reiterate that such inspections should already be being conducted by the Applicant to ensure that it understands the coastal processes in the area and any erosion issues.

7.3 ESC is very concerned by the Applicant's assertion in Paragraph 1.7.6 that *'towards Thorpeness and at Thorpeness Haven which includes the location of the landfall site, the policy is for no active intervention, allowing the natural development of the frontage.'* The current Shoreline Management Plan policy for both Unit ALB 14.1 Thorpeness Haven Properties[1] and Unit ALB 14.2 Thorpeness Haven Beach[2] is 'Managed Realignment', not 'No Active Intervention'. A possible explanation for this inaccuracy is that the Applicant appears to be referencing the Shoreline Management Plan dated 2010, but a 2015 revision to Policy ALB 14.1 (Thorpeness Haven Properties) introduced a change in approach from 'No Active Intervention' to 'Managed Realignment' in this area[3]. ESC requests that the Applicant urgently addresses this inaccuracy to ensure that the ES is informed by the most up-to-date Shoreline Management Plan policies.

7.4 Paragraph 1.7.19 states that *'generally speaking, the northern Suffolk coastline may be considered erosive, while the southern Suffolk coastline shows long term accretional trends (Reeve, Horrillo-Caraballo, Karunarathna, & Pan, 2019; Mott MacDonald, 2014; BEEMS Technical Report TR311).'* ESC wishes to note that it is currently working on some acute erosion issues on the southern Suffolk coastline. ESC therefore considers this statement to be an unhelpful, over-simplified generalisation of the Suffolk Coastline, and that it should be removed from the ES chapter.

7.5 Paragraph 1.7.42 notes that as a result of a missing figure in the 'Suffolk (SMP 7) Coastal Trends Report' from the Anglian Coastal Monitoring Programme ('ACMP'), published in 2022 by the Environment Agency, the Applicant's *'assessment relies upon the reported results to describe the erosional trends.'* ESC obtained this missing figure from the ACMP and sent this via email to the Applicant on 14 May 2025. The Applicant subsequently advised that the ES chapter would be updated accordingly. ESC is therefore disappointed to see that this has not been actioned, and requests that the necessary updates are made at Deadline 3. The figure in question, although also sent directly to the Applicant as previously noted, is provided in Figure 1 of this document.

7.6 Paragraph 1.7.144 states that *'due to the lack of site-specific erosion data for the landfall site, the assessment makes high-level estimates of erosion distance and erosion rates using adjacent estimates as a proxy.'* ESC considers that the Applicant could have analysed the open source ACMP topographic dataset referenced earlier in Section 1.7 of the Chapter. This

[1] https://environment.data.gov.uk/shoreline-planning/unit/SMP7/ALB14.1
[2] https://environment.data.gov.uk/shoreline-planning/unit/SMP7/ALB14.2
[3] https://environment.data.gov.uk/shoreline-planning/documents/SMP7%2FThorpeness%20Policy%20Change%20April%202015%20Shoreline%20Management%20Plan%207.pdf

dataset is also utilised by ABPmer for its beach profile analysis, as noted in Paragraph 1.7.44. ESC considers that the Applicant's efforts to collect and analyse primary coastal geomorphology data have been inadequate, resulting in no baseline dataset with which to compare any future change.

7.7 Table 1.18 states that *'the beach landfall sites and joint bays that run beneath the beach, may be excavated'* during decommissioning. ESC wishes to note that it would not support the use of heavy plant on the beach for this excavation and removal of cable infrastructure due to the negative impacts this would have on the beach geomorphology and the surrounding Leiston-Aldeburgh Site of Special Scientific Interest ('SSSI'). ESC considers that the more pragmatic approach to decommissioning detailed in Paragraph 1.9.79 (that is, to review possible solutions at the time of decommissioning, and possibly leave the infrastructure in-situ with stabilisation if this is considered to be less damaging than excavation and removal) is more appropriate. Therefore, ESC suggests that the wording in Table 1.18 is removed or amended to reflect Paragraph 1.9.79.

7.8 ESC welcomes the commitment to monitoring of the beach profile and erosion rates through additional mitigation measure MPE06 detailed in Paragraph 1.10.1. However, the wording is vague and ESC requests it is amended to detail a more systematic monitoring approach.

Figure 1: Missing figure from the ACMP's Suffolk (SMP 7) Coastal Trends Report 2021. Figure shows rates of Shoreline Movement (at Mean Sea Level) for the Aldeburgh monitoring cell.