



**The Great Grid Upgrade**

Sea Link

# Sea Link

## Volume 9: Examination Submissions

Document 9.81: Applicant's Response to Suffolk Energy Action Solutions (SEAS)  
Relevant Representation - Michelle Bolger Expert Landscape Consultancy (MBELC)  
Report 2025

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**nationalgrid**

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# Executive Summary

## Ex1.1 Summary

- Ex1.1.1 A Relevant Representation was received from Suffolk Energy Action Solutions (SEAS) **[RR-5210]** that was informed by a report prepared by Michelle Bolger Expert Landscape Consultancy (MBELC 2025 Report). The MBELC 2025 Report comprises a review of the Environmental Statement (ES) Landscape and Visual Impact Assessment (LVIA) Application Documents submitted by the Applicant. It is concerned with the Saxmundham Converter Station element of the application.
- Ex1.1.2 The MBELC 2025 Report considers that the following aspects of the ES LVIA are flawed:
- site selection and co-location;
  - methodology including judgements of value, susceptibility and sensitivity;
  - effects on the approach to Saxmundham from the south;
  - effects on LCA L1 Heveningham and Knodishall Estate Claylands;
  - effects of the bridge over the River Fromus on landscape and visual receptors; and
  - adequacy of the visualisations.
- Ex1.1.3 This document is the Applicant's response to the content and conclusions of the MBELC 2025 Report included in the Relevant Representation from SEAS. The Applicant responds to each of the above six areas of concern providing evidence from the ES LVIA. The Applicant strongly refutes the assertion that the site selection, cumulative impact assessment and methodological judgements are flawed, that the mitigation is inadequate or that the visualisations and their analysis are misleading.

# 1. Introduction

- 1.1.1 This document sets out the Applicant's response to the Michelle Bolger Expert Landscape Consultancy (MBELC) 2025 Report cited and attached to the Suffolk Energy Action Solutions (SEAS) Relevant Representation **[RR-5210]** on Landscape and Visualisation.
- 1.1.2 The Applicant's response to the SEAS Landscape and Visualisation Executive Summary is contained in Table 1.3 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** and is not repeated below.
- 1.1.3 This document is set out in response to the sections contained within the MBELC 2025 Report. The MBELC 2025 Report refers to and attaches in Appendix 1 a previous document prepared by MBELC in 2023 which provided a review of the Preliminary Environmental Information Report (PEIR) for the Sea Link DCO Application. This document however, does not seek to respond to it as the Environmental Statement (ES) LVIA supersedes the PEIR which was an earlier, preliminary report.



## 2. Applicant's Response

### 2.1 Site Selection and Co-Location

- 2.1.1 The Applicant's response to matters regarding alternative sites is provided in Table 1.2 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** and in Appendix B Local Alternatives. Information on the reasoning behind the connection location for the Proposed Project, the alternatives considered and how National Grid has coordinated with other projects is contained in:
- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];**
  - **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];**
  - **Application Document 7.2 Strategic Options Back Check Report [APP-320];**
  - **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044];** and
  - **Application Document 7.13 Coordination Document [APP-363].**
- 2.1.2 Seeking opportunities to coordinate infrastructure is strongly encouraged in policy. The National Planning Policy Statements (NPSs) most relevant to the Proposed Project comprise the Overarching NPS for Energy (EN-1), the NPS for Renewable Energy (EN-3) and the NPS for Electricity Networks Infrastructure (EN-5). These NPSs advocate the importance of coordination when considering the location and route of onshore and offshore transmission infrastructure to minimise adverse impacts on the local environment and host communities. NGET was strongly encouraged to explore opportunities for coordinating with the two NGV projects in stakeholder feedback throughout the pre-application stages of the project, including from East Suffolk Council (ESC) and Suffolk County Council (SCC).
- 2.1.3 Whilst the Saxmundham converter station site decision-making process sought opportunities to coordinate with NGV as outlined in **Application Document 7.10 Coordination Document [APP-363]**, the Sea Link DCO is not seeking consent for other converter stations and as such the LVIA (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**) only considers the landscape and visual effects of the Proposed Project. The assessment of multiple converter stations (LionLink Offshore Interconnector and the Suffolk Onshore Scheme) is presented in the cumulative assessment (**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**). Nautilus Interconnector was not considered in the Inter-Project Cumulative Effects chapter for the reasons explained in paragraphs 13.2.7 – 13.2.9 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.

## 2.2 Methodology

- 2.2.1 In paragraph 4.1 of the MBELC 2025 Report, it states that four categories have been used for Sensitivity and Magnitude of Effect and three categories for Significance of Effect within the LVIA, noting for simplicity the MBELC 2025 Report has not included Negligible and No Change categories. The Applicant can understand for simplicity that the None and No Change categories are removed from the narrative presented as they reflect no change to the landscape or visual receptor. However, Negligible is an important aspect of the Magnitude and Significance of Effect criteria as clearly set out in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**. As outlined in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**, the LVIA considers a five-point scale for Sensitivity and Magnitude of Effect and a four-point scale for Significance of Effect, excluding the None and No Change categories for Magnitude of Effect and Significance of Effect respectively. This is entirely consistent with Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013), and accepted by SCC and ESC.
- 2.2.2 Table 1 of the MBELC 2025 Report applies a matrix to some of the landscape and visual effects reported within the LVIA (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**). Technical Guidance Note LITGN-2024-01 acknowledges in 3(6) that *‘diagrams or matrices can be useful as a means of illustrating to the reader how judgements are combined and can support and summarise narrative descriptive text (GLVIA3 paragraph 8.10), but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process. All judgements need to be supported by clear description.’* The Significance of Effect judgements reported within the LVIA are clearly justified with regard to the methodology with detailed supporting evidence. **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]** and **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment – Suffolk [APP-098]** does this, providing clear, reasoned evidence for each of the assessments.
- 2.2.3 The MBELC 2025 Report selectively applies assessments from the LVIA and omits those where a large magnitude of change on a very high sensitivity receptor has given rise to a major adverse effect (for example Viewpoint 20). Irrespective of whether the MBELC 2025 Report considers that some of the moderate adverse effects are an underestimation of the effect, the threshold of significance states that both moderate and major adverse effects are considered to be significant. This is underpinned by GLVIA3 which states in paragraph 3.33 that *“it is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided that it is made clear whether or not they are considered significant”*.
- 2.2.4 With specific regard to the visual assessment of Viewpoint 4 the MBELC 2025 Report fails to state that the Significance of Effect levels reported at construction and operation year 1 are major adverse due to the substantial changes in the composition of the view. By operation, summer year 15, the descriptive text provides reasoning as to why the Magnitude of Effect reduces from very large at winter year 1 to large at summer year 15 and the corresponding reduction in overall Significance of Effect to moderate adverse. This remains a significant adverse effect but is considered to be comparatively less of a deterioration in the view due to the establishment of the mitigation planting.

- 2.2.5 Accordingly, notwithstanding any differences in professional judgement between the ratings, both moderate and major effects are regarded as significant, demonstrating that the LVIA does not underestimate the effects of the development.

## 2.3 Impacts on Saxmundham

- 2.3.1 The Settlement Sensitivity Assessment Volume 2: Suffolk Coastal (East Suffolk Council, 2018) was originally scoped out in the PEIR on the grounds that its two underlying development scenarios – housing and commercial - are not applicable to the Suffolk Onshore Scheme. However, it is acknowledged that the Settlement Sensitivity Assessment contains relevant information, which has been used to supplement the landscape baseline alongside the detailed district landscape character assessments and additional baseline notes from the Applicant's field work. This is set out within the Landscape Baseline appendix (**Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**). This includes reference to the *“important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus Valley”*.
- 2.3.2 The assessment of effects on LCA B4 (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**) does not explicitly reference the published documents that inform the baseline characteristics of the LCAs, as these are detailed **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**. Consequently, the Settlement Sensitivity Assessment is not specifically named in this appendix. Nonetheless, within the landscape assessment of LCA B4: Fromus Valley (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**), the key landscape characteristics are noted within the assessment and are described in the narrative, including reference to effects on key features identified in the Settlement Sensitivity Assessment including the parkland landscape, the vegetation network of the river valley, the rural character of the landscape and the approach to Saxmundham.
- 2.3.3 The ES acknowledges that the operational infrastructure (including the 6 m River Fromus bridge) would have a significant adverse effect on LCA B4, the distinctive valley landscape and the scenic southern approach to Saxmundham at year 1 operation. However, once the native woodland planting proposed around the River Fromus, replacing the rotational willow crop, is established, this would largely screen and integrate the bridge into the landscape and historic parkland setting; it is therefore clearly mitigable. The hedgerow and tree planting along the access road would further assist in integrating the access road into the valley landscape as it crosses the arable field. Furthermore, **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** considers that the approach from the south to Saxmundham Conservation Area, Hurts Hall Grade II Listed Building and Associated Parkland would experience minor adverse (and therefore not significant) effects during operation. The residual long-term effects on the landscape and the setting of Hurts Hall are not therefore significant and the extensive native woodland mitigation planting within the Fromus valley cannot be considered as resulting in unmitigable harm on the southern approach to Saxmundham.

## 2.4 ES LVIA Judgements

- 2.4.1 The factors which have informed the consideration of value, susceptibility and sensitivity are identified in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** and are in accordance with GLVIA 3 (Landscape Institute and Institute of Environmental Management and Assessment, 2013) and LI TGN-24-01 (Landscape Institute, 2024). The landscape value and susceptibility ratings for LCA L1 are set out in the landscape baseline appendix (**Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**) and landscape assessment appendix **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**).
- 2.4.2 The landscape value rating for LCA L1 Heveningham and Knodishall Estate Claylands reflects a balance between the landscape's recreational, perceptual, cultural heritage and functional values, and the fact that it is undesignated. While the lack of designation does not imply a lack of value, it is an important factor in the overall judgement, along with the prevalence of large-scale arable farmland which limits habitats, and a fragmented green infrastructure network resulting from historic vegetation loss. The factors that reduce the susceptibility rating for LCA L1 include the large-scale field pattern, the presence of larger agricultural buildings and the woodland blocks and layered vegetation in the wider landscape which together can provide a vegetated backcloth to development. These are considered alongside the perceptual qualities such as relative tranquillity and remoteness, and the deeply rural character which increase the susceptibility.
- 2.4.3 The medium sensitivity rating of LCA L1 is consistent with the LVIA methodology (**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**) which describes landscapes of local value that contain mostly common elements and characteristics, some sense of place and some features of value.
- 2.4.4 Regardless of whether the MBELC 2023 Report suggests that the sensitivity should be '*at least medium/high*,' both the Applicant's assessment and the MBELC 2025 Report indicate that effects on LCA L1 would remain significant during operation.
- 2.4.5 The MBELC 2025 Report suggests that there is an over emphasis, in the landscape and visual assessment, on the presence of detractors in the landscape, citing Viewpoint 2 as an example. Understanding the character of a particular landscape requires analysis of the characteristic elements which can be both positive and negative. Identifying the presence of detracting features in the landscape as well as those which contribute positively to the character is entirely appropriate in establishing the baseline character and in informing judgements of sensitivity. This similarly applies when considering the components which contribute to the composition of a view.
- 2.4.6 With regard to the susceptibility rating for Viewpoint 2, as detailed in the visual assessment appendix (**Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]**), the visual experience of Public Rights of Way users and road users is strongly influenced by traffic along the B1121. This results in a medium susceptibility rating, reflecting that the view is of general interest or appreciation to the viewers activity, with some scenic qualities, but also detracting features related to the content and composition of the view, in line with the LVIA methodology. For this receptor, the inclusion of the view as an 'Important Local View' and as part of the 'Green Gateway' in the Saxmundham Neighbourhood Plan



elevates the overall sensitivity rating to high, due to the visual value considerations which form part of the sensitivity judgement.

- 2.4.7 The value, susceptibility and resulting sensitivity of each of the landscape and visual receptors are detailed in the assessment appendices (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** and **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]**). The main chapter (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**) includes tables which set out this resulting sensitivity rating with the Magnitude of Effect and Significance of Effect for all project stages in Section 1.8 Assessment of Impacts and Likely Significant Effects.
- 2.4.8 The MBELC 2025 Report suggests that there are inconsistencies in the assessment of susceptibility for visual receptors, citing Viewpoints 2 and 20 as examples. Although these locations are close to one another, the difference in susceptibility ratings reflects the nature of the activity of the people experiencing the view and the degree to which their attention or interest is focused on the view and the visual amenity it provides. Viewpoint 20 is set back further from the B1121, is representative of users of the Sailors' Path recreational route and nearby residential receptors. This explanation is set out in the landscape assessment appendix (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**).
- 2.4.9 For Viewpoints 1–5 and 19–21, the visual value judgements note detracting features such as traffic along the B1119, wood pole lines, large-scale agricultural buildings, a distant overhead line, the Christmas Tree plantation, and long-distance views of Sizewell energy infrastructure. Despite these detractors, the sensitivity ratings are assessed as high or very high. Therefore, it cannot be argued that the Applicant's LVIA overemphasises the presence of detractors or underestimates the likely landscape and visual effects.

## 2.5 Access Road and bridge across the River Fromus – Harm to LCA B4:River Fromus

- 2.5.1 It is assumed that whenever LCA B4: River Fromus is referred to within the MBELC 2025 Report that this refers to LCA B4: Fromus Valley (Suffolk Coastal Landscape Character Assessment).
- 2.5.2 The ES acknowledges that the operational infrastructure (including the up to 6 m River Fromus bridge) would have a significant adverse effect on LCA B4, the distinctive valley landscape and the scenic southern approach to Saxmundham at year 1 operation. However, once the native woodland planting proposed around the River Fromus, replacing the rotational willow crop, is established, this would largely screen and integrate the bridge into the landscape and the historic parkland setting; it is therefore clearly mitigable. The hedgerow and tree planting along the access road would further assist in integrating the access road into the valley landscape as it crosses the arable field. Furthermore, **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** considers that the approach from the south to Saxmundham Conservation Area, Hurts Hall Grade II Listed Building and Associated Parkland would experience minor adverse (and therefore not significant) effects during operation. The residual long-term effects on the landscape and the setting of Hurts Hall are not

therefore significant and the extensive native woodland mitigation planting within the Fromus valley cannot be considered as resulting in unmitigable harm.

- 2.5.3 As stated in the ES and as represented by Viewpoint 2, the River Fromus Bridge and associated vegetation removal does not influence the extent of the converter station that would be visible in views from the B1121. The converter station would appear beyond the ridgeline and adjacent to Bloomfield's Covert which is at a higher elevation to users travelling along the B1121 and would not consequently be obscured by the River Fromus Bridge and associated vegetation removal which would be visible in a different part of the mid ground of the view where the land slopes down towards the River Fromus crossing. This is clearly shown in **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**.
- 2.5.4 The MBELC 2025 Report incorrectly states that the loss of trees along the river and fragmentation of the treed river corridor will be permanent. Extensive native woodland planting is proposed along the entire western side of the River Fromus which is currently surrounded by rotational willow crop that is felled on a cyclical basis. Accordingly, the claim that the ES LVIA has underestimated harm to LCA B4 is not correct.

## 2.6 Viewpoints and Visualisations

- 2.6.1 The additional viewpoints that were prepared following the production of the PEIR were a result of stakeholder consultation, further design development and Applicant field work.
- 2.6.2 The visualisations have been prepared in accordance with best practice (Landscape Institute, 2019). The photomontage set was agreed during landscape thematic meetings with SCC and ESC. Year 1 winter views demonstrate the worst-case scenario where the mitigation would be young and not established and the existing deciduous vegetation not in leaf. The year 15 summer photomontages are used to show the best-case scenario with the mitigation planting established and seen within the landscape context of trees in leaf. Year 1 summer and Year 15 winter photomontages were not prepared. It is considered that the only difference would be that the leaves would either be in leaf or not and that the height of the mitigation planting would not be different, therefore not providing any additional material information. Furthermore, in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** it notes that *"unless stated in the assessment text, it is assumed that there would be no difference in the magnitude of effect between winter and summer. For Year 15 winter, it is assumed that there would be the same height of mitigation planting as for summer and it would not be in leaf, so visualisations have not been prepared."* If there had been a difference between the effects of summer and winter in year 15, this would have been stated.
- 2.6.3 The presentation of the suite of visualisations as noted above was agreed with stakeholders and the use of cylindrical panoramic images is entirely consistent with Visual representation of Development Proposals Technical Guidance Note 06/19 (Landscape Institute, 2019).
- 2.6.4 This is not a deficiency in the presentation of the visualisations nor a fundamental flaw, but a considered and proportionate approach which was agreed with stakeholders. Furthermore, visualisations are a tool used to support the professional LVIA process and are not the assessment itself.

**Application Document 9.14 Suffolk and Kent Illustrative Visualisations [REP1-296 and REP1-297]** provides illustrative visualisations from Viewpoints 1, 2 and 4. The illustrative visualisations have been prepared to illustrate how a more realistic and detailed model of the Suffolk Onshore Scheme would look rather than the block photomontages which showed the maximum parameters for the Suffolk Onshore Scheme. The River Fromus bridge is shown in the visualisations from Viewpoint 2 which include three different heights for the bridge.

## 3. Summary

- 3.1.1 In this document the Applicant has provided a detailed response to each of the six areas of concern that are identified in the MBELC 2025 Report, included in the Relevant Representation from SEAS **[RR-5210]**.
- 3.1.2 As set out in the responses above, the Applicant acknowledges that the Saxmundham Converter Station would have an adverse effect on the rural character of the LCA due to the scale and nature of the development. However, the predominantly flat landform and the existing layered vegetation network across the LCA help to limit the extent and geographic spread of these effects.
- 3.1.3 The residual long-term effects on the landscape of the Fromus Valley and the setting of Hurts Hall have been shown to be not significant. Moreover, the extensive native woodland mitigation planting within the valley cannot be regarded as causing unmitigable harm to the southern approach to Saxmundham.
- 3.1.4 The Applicant strongly refutes the assertion that the site selection, cumulative impact assessment and methodological judgements are flawed, that the mitigation is inadequate or that the visualisations and their analysis are misleading.



# References

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