

**The Great Grid Upgrade**

Sea Link

# Sea Link

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# Executive Summary

## Ex1.1 Introduction

- Ex1.1.1 This document constitutes an Addendum to **Application Document 7.1 (C) Planning Statement [AS-057]** and has been prepared to:
- Respond to questions from the Examining Authority (ExA) (question ISH2.032 in **Supplementary agenda additional questions for Issue Specific Hearing 2 (ISH2) [EV6-003]** and questions 1SN4/1SN5 in **Examining Authority’s Written Questions 1 (ExQ1) [PD-017]** and Natural England (NE) (in Table 3 of **Appendix H3 Natural England’s Advice on Suffolk LVIA [REP3-120]**) raised during the examination;
  - Give an overview of upcoming changes to the National Planning Policy Framework, which were proposed by the Government in December 2025;
  - Provide a summary of the policy tests on need, in response to a number of written submissions from Interested Parties seeking to draw the attention of the ExA on the consideration of the need case .

## Ex1.2 Review of National Policy Statements 2026

- Ex1.2.1 During the course of the examination of the Sea Link DCO application, in December 2025, the Department of Energy Security and Net Zero published updated versions of NPS EN-1, EN-3 and EN-5 (hereafter ‘the 2026 NPSs’), which came into force on 6 January 2026 and thus superseded the previous NPSs (designated on 17 January 2024).
- Ex1.2.2 The transitional arrangements set out in Section 1.6 of the new 2026 NPS EN-1 (Department for Energy Security and Net Zero, 2026) confirm that the newly designated NPSs will only have effect in relation to applications for development consent accepted for examination after December 2025. Since the Sea Link DCO application was accepted for examination in April 2025, the 2024 versions of the NPSs still have effect for its determination. However, as set out in Section 1.6 of the 2026 NPS EN-1, the newly designated NPSs can be important and relevant considerations in the decision-making process.
- Ex1.2.3 Given that the 2026 NPSs are capable of being important and relevant to the decision-making process for the Sea Link DCO application, the Applicant has therefore undertaken a review of the 2026 NPSs EN-1, EN-3 and EN-5.
- Ex1.2.4 The 2026 NPSs have now embedded the Clean Power Action Plan, prioritising 95 % clean electricity by 2030 and aligning CNP policy with a presumption in favour of consent for qualifying projects. The Proposed Project was identified in the NESO’s Advice on Achieving Clean Power by 2030 (NESO, 2024), so to the extent that the new NPSs are an important and relevant consideration, the critical and urgent nature of the project is therefore reinforced by the inclusion of the Clean Power Mission in the 2026 NPSs.

## Ex1.3 Draft National Planning Policy Framework

- Ex1.3.1 The National Planning Policy Framework (NPPF) is considered to be generally of less relevance to the SoS than the relevant Energy NPSs. However, the NPPF is capable of being an important and relevant consideration in the SoS decision-making for NSIPs.
- Ex1.3.2 The government published a revised version of the NPPF in December 2025 and is seeking views on this revised version until 10 March 2026.
- Ex1.3.3 The Applicant has therefore reviewed the 2025 Draft NPPF (Ministry of Housing, Communities and Local Government, 2025) to assess the potential effect of the proposed changes in relation to the Proposed Project.
- Ex1.3.4 The updates to the 2025 Draft NPPF are largely focused on housing (building homes around stations, driving urban and suburban densification, securing a diverse mix of homes, supporting small and medium sites).
- Ex1.3.5 However, Chapter 10 of the Draft NPPF, entitled “Securing clean energy and water”, is directly relevant to the Proposed Project and contains policies “to support the development and operation of energy and water infrastructure in ways which align with wider development, clean power and net zero objectives (including the delivery of clean power by 2030):
- Plan-making policies: Policy W1: Planning for energy and water and Policy W2: Securing renewable and low carbon energy and electricity network infrastructure
  - National decision-making policy: Policy W3: Renewable and low carbon energy development and electricity network infrastructure.
- Ex1.3.6 Collectively, plan-making policies W1 and W2, alongside national decision-making policy W3 create a coherent and positive framework for electricity networks framing them as:
- Essential enablers of national objectives for net zero, energy security and economic growth (W1)
  - Infrastructure to be planned for spatially and strategically (W2)
  - Development that should be positively weighed in decision-making (W3).
- Ex1.3.7 Overall, it is therefore considered that the policies contained in Chapter 10 of the Draft NPPF provides further support to the Proposed Project, to the extent that these policies are relevant and important..

## Ex1.4 Policy Position on Need

- Ex1.4.1 As a type of electricity network infrastructure identified in Part 3 of NPS EN-1 (Department for Energy Security and Net Zero, 2024), the need for the Proposed Project is established through that NPS and substantial weight should be given to this need, as stated in its paragraph 3.2.7. In addition, the Secretary of State (SoS) is not required to consider separately the specific contribution that the Proposed Project would make to satisfying the need for new electricity network infrastructure, in line with paragraph 3.2.8.
- Ex1.4.2 Given that the level of urgency and need for the Proposed Project is established by NPS EN-1, the decision-maker should therefore adopt a starting point of presumption in

favour of granting consent unless other policies in the relevant NPSs indicate that development consent should be refused.

## **Ex1.5 Additional Responses to ExA Questions 1SN4 and 1SN5**

Ex1.5.1 The Applicant provided an initial response to these questions 1SN4 and 1SN5 at Deadline 3 in **Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]**. A further update is provided in this Planning Statement Addendum, following discussions with key stakeholders.

## **Ex1.6 Special Qualities of the Suffolk & Essex Coast & Heaths AONB**

Ex1.6.1 In response to comments from NE in Table 2 of **Appendix H3 Natural England's Advice on Suffolk LVIA [REP3-120]**, further clarity is provided on the impact of the Proposed Project on the Special Qualities of the Suffolk & Essex Coast & Heaths Area Of Natural Beauty (AONB), through the consideration of the sub-factors of the Special Qualities Indicators .

# 1. Introduction

## 1.1 Purpose of this document

- 1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as 'the Applicant') to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe
- 1.1.2 This document constitutes an Addendum to **Application Document 7.1 (C) Planning Statement [AS-057]** and has been prepared to:
- Respond to questions from the Examining Authority (ExA) and NE raised during the examination;
  - Give an overview of upcoming changes to the National Planning Policy Framework, which were proposed by the Government in December 2025;
  - Provide a summary of the policy tests on needs and alternatives.

## 1.2 Structure of this document

- 1.2.1 The structure and content of this Planning Statement Addendum is described further below.
- 1.2.2 Updated versions of the National Policy Statements (NPS) EN-1, EN-3 and EN-5 were designated on 6 January 2026. For the Issue Specific Hearing 2 (28 to 30 January 2026), the ExA issued a number of additional questions (**Supplementary agenda additional questions for Issue Specific Hearing 2 (ISH2) [EV6-003]**). This included question No ISH2.02 asking the Applicant to review the application documents in light of the newly designated NPSs. Section 2 of this Addendum provides the Applicant's response to this question.
- 1.2.3 The Government published a revised version of the National Planning Policy Framework (NPPF) in December 2025 and is seeking views on this document until 10 March 2026. As explained in paragraph 5 of the current NPPF (Ministry of Housing, Communities and Local Government, 2024), the NPPF does not contain specific policies for nationally significant infrastructure projects (NSIPs), but it is capable of being an important and relevant consideration in decision-making for NSIPs. Therefore, Section 3 of this Addendum provides a commentary on the potential effects of the proposed changes to the NPPF on matters related to the Sea Link Development Consent Order (DCO) application.
- 1.2.4 Section 4 of this Addendum seeks to reiterate the policy tests set out in NPS EN-1 (Department for Energy Security and Net Zero, 2024) with regard to need. This is to address a number of written representations and submissions from Interested Parties raising this key planning issue.

- 1.2.5 Section 5 of this Addendum provides additional responses to two written questions from the ExA issued on 17 December (**Examining Authority’s Written Questions 1 (ExQ1) [PD-017]**): 1SN4 and 1SN5, in relation to National Policy Statement for Ports and the East Inshore and East Offshore Marine Plan, respectively. The Applicant provided initial responses to these two questions at Deadline 3 in **Application Document 9.73 Applicant’s Responses to First Written Questions [REP3-069]**. Following ongoing discussions with key stakeholders, these initial responses can be further elaborated, as set out in Section 5.
- 1.2.6 Finally, in its Deadline 3 submission (**Appendix H3 to the Natural England Deadline 3 Submission – Natural England’s Comments on Suffolk Landscape) [REP3-120]**, NE commented on the Applicant’s Technical Note: **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. As part of their review of this technical note, NE requested a more detailed appraisal of the impact of the Sea Link Project on the Special Qualities of the Suffolk & Essex Coast & Heaths National Landscape, than the initial appraisal provided in **Application Document 7.1 Planning Statement [AS-057]**. This appraisal is provided in Section 6 of this Addendum.

# 2. Review of National Policy Statements 2026

## 2.1 Introduction

- 2.1.1 The Planning Act 2008 (PA2008) provides the legislative basis for decision-making for applications for Development Consent Order (DCO). In March 2022, the Secretary of State (SoS) issued a direction under Section 35(1) of the PA2008 confirming that the Proposed Project should be treated as a development for which development consent under the PA2008 is required. According to Section 104(2) of PA2008, the SoS, in deciding such applications, must have regard to the relevant National Policy Statements (NPSs).
- 2.1.2 As set out in **Application Document 7.1 Planning Statement [AS-057]**, the following NPSs apply to the Sea Link DCO application, for the purposes of Section 104(2) of the PA2008:
- Overarching NPS for Energy EN-1;
  - NPS for renewable energy infrastructure EN-3 (Department for Energy Security and Net Zero, 2024); and
  - NPS for electricity network infrastructure EN-5.
- 2.1.3 During the course of the examination of the Sea Link DCO application, in December 2025, the Department of Energy Security and Net Zero published updated versions of NPS EN-1, EN-3 and EN-5 (hereafter ‘the 2026 NPSs’), which came into force on 6 January 2026 and thus superseded the previous NPSs (designated on 17 January 2024).
- 2.1.4 According to the transitional arrangements set out in Section 1.6 of the new 2026 NPS EN-1 (Department for Energy Security and Net Zero, 2026), the newly designated NPSs will have effect only in relation to applications for development consent accepted for examination after the final publication of the NPSs in December 2025. Since the Sea Link DCO application was accepted for examination in April 2025, the 2024 versions of the NPSs still have effect for its determination. However, as set out in Section 1.6 of the 2026 NPS EN-1, the newly designated NPSs can be important and relevant considerations in the decision-making process.
- 2.1.5 Given that the 2026 NPSs are capable of being important and relevant to the decision-making process for the Sea Link DCO application, in its supplementary agenda additional question ISH2.02 (**Application Document Supplementary agenda additional questions for Issue Specific Hearing 2 (ISH2) [EV6-003]**), the ExA invited the Applicant to review the application documents in light of the newly designated NPSs and to provide any updates or amendments as necessary.
- 2.1.6 The Applicant has therefore undertaken a review of the 2026 NPSs EN-1, EN-3 and EN-5 and set out the key changes pertinent to the Proposed Project in the sections below.

## 2.2 Overarching NPS for Energy (EN-1)

- 2.2.1 NPS EN-1 sets out the general principles and impacts to be taken into account for all types of energy NSIP development. It forms the primary basis for determining if development consent should be granted in the energy sector.
- 2.2.2 An important update in the 2026 NPS EN-1 (Department for Energy Security and Net Zero, 2026) is that this document has now embedded the Clean Power 2030 Action Plan, published by the government in December 2024 (see Section 2.2 Clean Power and net zero by 2050) of 2026 NPS EN-1. As explained in paragraph 2.2.6 of the 2026 NPS EN-1, this plan sets out the strategic priority of achieving 95% clean electricity by 2030, meeting the sixth Carbon Budget advice and pushing the country towards net zero in 2050.
- 2.2.3 In line with the above, paragraph 3.2.1 of NPS EN-1 has been amended to state, in the 2026 version:
- “The government’s objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including delivery of our carbon budgets and Nationally Determined Contributions”.*
- 2.2.4 It is explained in **Application Document 7.1 Planning Statement [AS-057]** that the Proposed Project was identified in *Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 – Annex 2: Networks, connections and network access analysis* (NESO, 2024) as one of three projects that are critical to delivering a network which supports the clean power pathways. The critical and urgent nature of the Proposed Project is therefore recognised in the strongest terms in this report on achieving Clean Power 2030 objectives. The inclusion of the government’s Clean Power 2030 Action Plan in the 2026 NPS EN-1 therefore lends further weight to the need case for the Proposed Project.
- 2.2.5 As stated in paragraph 3.2.5 of the 2026 NPS EN-1, the Clean Power Action Plan and the pathways to 2030 are now therefore part of the government’s strategic framework, along with the Strategic Spatial Energy Plan (SSEP) and the Centralised Strategic Network Plan (CSNP). Paragraph 3.2.5 goes on to state that applicants should consider those, *“together with other relevant considerations to inform developments of new energy infrastructure projects”.*
- 2.2.6 The SSEP is a spatial energy plan being prepared by the National Energy System Operator (NESO), which will set out *“the spatial requirement of Great Britain’s future energy system more future energy system more accurately so that future decisions on land and sea use can better reflect energy requirements and support future decision-making by the UK government, Scottish and Welsh governments, local decision-makers, and markets”* (Department for Energy Security and Net Zero, 2024). The SSEP is still in early stages of preparation.

- 2.2.7 The CSNP is also a framework being developed by NESO to coordinate electricity, gas and hydrogen transmission infrastructure in Great Britain and enable the delivery of a long-term, holistically designed network plan. It is also in its early stages of preparation and has not been formally published. Paragraph 3.3.75 of the 2026 NPS EN-1 endorses the needs case for CSNP, stating:
- “This NPS recognises the need for the infrastructure proposed in the forthcoming CSNP, including infrastructure covered by future CSNP publications adopted following a similar process. Therefore, where a project is assessed and justified through a CSNP, the Secretary of State will take the need for that project as having been established and not question the need for that project during the consenting process”.*
- 2.2.8 The 2026 NPS EN-1 clarifies the weight given to Critical National Priority (CNP) infrastructure project in order to meet the Clean Power 2030 Mission, with paragraph 4.2.16 setting out:
- “Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero”.*
- 2.2.9 Whilst the policy presumption of CNP remains, the 2026 NPS EN-1 provides additional clarity on how it should be applied, including new flow diagrams (Figure 2 and Figure 3 of 2026 NPS EN-1).
- 2.2.10 In relation to CNP policy, paragraph 4.2.25 of the 2026 NPS EN-1 also specifies that *“compensation, by definition, does not reduce an adverse effect resulting from development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken.”* This provides helpful clarification on this element of the mitigation hierarchy.

## 2.3 NPS for Renewable Energy Infrastructure (EN-3)

- 2.3.1 NPS EN-3 sets out planning policy for renewable energy generating NSIPs. The Proposed Project is a bootstrap and therefore, of a type covered by NPS EN-3.
- 2.3.2 Whilst *“offshore transmission infrastructure such as bootstraps”* is mentioned in paragraph 2.8.10 of the current NPS EN-3 (Department for Energy Security and Net Zero, 2024), this reference has been removed in paragraph 2.8.10 of the 2026 NPS EN-3, which now refers to *“offshore infrastructure as defined in the Energy Act 2023”*.
- 2.3.3 The definition of “offshore transmission” in the Glossary section of the 2026 NPS EN-3 (Department for Energy Security and Net Zero, 2026) has been expanded to cover “offshore hybrid assets”. Within this, the definition of bootstraps has also been amended to clarify that they are classed as offshore transmission by Ofgem:
- “Offshore elements of the ‘onshore’ transmission system – assets which reinforce the onshore transmission network but are located offshore. An example of this is a ‘bootstrap’ which is a link between two points on the onshore transmission network by way of a subsea/ offshore cable. This infrastructure is also sometimes referred to as ‘wet’ onshore transmission infrastructure, and is classified by Ofgem as offshore transmission.”*

## 2.4 NPS for Electricity Networks Infrastructure (EN-5)

- 2.4.1 NPS EN-5 principally covers high voltage long distance transmission and distribution infrastructure.
- 2.4.2 The 2026 NPS EN-5 (Department for Energy Security & Net Zero, 2026) also endorses the Clean Power 2030 Mission, with paragraph 1.1.2 stating:
- “A significant amount of new network infrastructure is required in the near term to directly support the government’s ambition to meet our Clean Power 2030 Mission. The Clean Power 2030 Action Plan sets out pathways for meeting targets in 2030 that will facilitate the achievement of net zero by 2050.”*
- 2.4.3 This emphasises the need and urgency for new network infrastructure, providing further support to the need case for the Proposed Project.
- 2.4.4 A key update in the 2026 NPS EN-5 is the introduction of Electricity Transmission Design Principles (ETDP), to be published by NESO. These ETDP will apply to onshore and offshore transmission infrastructure and *“will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design”* (paragraph 2.9.20). Paragraph 2.9.20 goes on to state that *“once the ETDP is published, developers should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules.”*
- 2.4.5 Paragraph 2.9.21 retains the clear statement that overhead lines should be the strong starting presumption for electricity networks in general (outside designated landscapes), which is currently set out in the 2024 NPS EN-5 (paragraph 2.9.20).

## 2.5 Summary

- 2.5.1 Due to the transitional provisions set out in the 2026 NPS EN-1, the Sea Link DCO application will still be determined in accordance with the 2024 NPSs. However, the 2026 NPSs updates are relevant and important considerations in the SoS decision-making process.
- 2.5.2 The 2026 NPSs have now embedded the Clean Power Action Plan, prioritising 95 % clean electricity by 2030 and aligning CNP policy with a presumption in favour of consent for qualifying projects. As a project which was identified in the NESO’s Advice on Achieving Clean Power by 2030 (NESO, 2024), the critical and urgent nature of the project is therefore reinforced by the inclusion of the Clean Power Mission in the 2026 NPSs.

# 3. Draft National Planning Policy Framework (December 2025)

## 3.1 Introduction

- 3.1.1 The National Planning Policy Framework (NPPF) was last updated in December 2024.
- 3.1.2 The Government published a revised version of the NPPF (Ministry of Housing, Communities and Local Government, 2025) in December 2025 and is seeking views on this revised version until 10 March 2026.
- 3.1.3 Paragraph 5 of the NPPF (Ministry of Housing, Communities and Local Government, 2024) outlines the role of the NPPF in the consideration of DCO applications. It states:  
*“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include this Framework).”*
- 3.1.4 This paragraph has been retained in the Draft NPPF (and is now paragraph 12).
- 3.1.5 On this basis, the NPPF is considered to be generally of less relevance to the SoS than the relevant Energy NPSs. However, the NPPF is capable of being an important and relevant consideration in the SoS decision-making for NSIPs.
- 3.1.6 The Applicant has therefore reviewed the Draft NPPF to assess the potential effect of the proposed changes in relation to the Proposed Project.

## 3.2 Review of the Draft NPPF

- 3.2.1 The Draft NPPF proposes significant changes to the planning system in England.
- 3.2.2 In terms of structure, the Draft NPPF seeks to introduce structural improvements to the document, providing distinct policies for plan-making and decision making. The traditional numbered paragraphs are removed, replaced by numbered policies. There is a strict separation between plan making policies and decision taking policies, with plan-making policies prohibited from being used in decision making.
- 3.2.3 In terms of content, there are twelve key policy changes proposed in the document, whose primary aim is *“to unlock more homes in the right places, and further support the commercial development needed to drive growth”* (Ministry of Housing, Communities and Local Government, 2025).
- 3.2.4 The updates to the Draft NPPF are therefore largely focused on housing (with key policy changes related to building homes around stations, driving urban and suburban densification, securing a diverse mix of homes and supporting small and medium sites).
- 3.2.5 However, Chapter 10 of the Draft NPPF, entitled *“Securing clean energy and water”*, is directly relevant to the Proposed Project and contains policies *“to support the development and operation of energy and water infrastructure in ways which align with*

*wider development, clean power and net zero objectives (including the delivery of clean power by 2030):*

- Plan-making policies: Policy W1: Planning for energy and water and Policy W2: Securing renewable and low carbon energy and electricity network infrastructure
- National decision-making policy: Policy W3: Renewable and low carbon energy development and electricity network infrastructure.

3.2.6 Policies W1 and W2 being plan-making policies, they are directed to local planning authorities and provide guidance on how the development plan should support the development of renewable and low carbon energy development and electricity network infrastructure.

3.2.7 Policy W3 is a decision-making policy and therefore applies to planning applications for renewable and low carbon energy development and electricity network infrastructure. It makes it clear, in its first paragraph, that “*substantial weight should be given to:*

*a) the benefits of such development for improving energy security, supporting economic development and moving to a net zero future”.*

3.2.8 The policy goes on to say, in its second paragraph, that “*Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure*”, adding that “*where proposals for this form of development come forward outside areas which have been identified as suitable for them, they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole*”.

3.2.9 Collectively, plan-making policies W1 and W2, alongside national decision-making policy W3 create a coherent and positive framework for electricity networks framing them as:

- Essential enablers of national objectives for net zero, energy security and economic growth (W1)
- Infrastructure to be planned for spatially and strategically (W2)
- Development that should be positively weighed in decision-making (W3).

3.2.10 Overall, it is therefore considered that the policies contained in Chapter 10 of the Draft NPPF provides further support to the Proposed Project, to the extent that these policies are relevant and important.

# 4. Policy Position on Need

## 4.1 Introduction

- 4.1.1 The identified need for the Proposed Project is set out in **Application Document 7.2 Strategic Options Back Check Report [APP-320]** and is not repeated here.
- 4.1.2 Section 104(2) of the Planning Act 2008 sets out the matters to which the Secretary of State (SoS) must have regard when deciding an application for Development Consent Order, in circumstances where a national policy statement has effect: these comprise any relevant NPS, appropriate marine policy documents, any local impact report, any matters prescribed in relation to the development and any other matters that the SoS considers to be both important and relevant to the decision.
- 4.1.3 Section 104(3) requires the SoS to decide the application in accordance with any relevant NPS, to the extent that one or more subsections (4) to (8) apply:
- (4): deciding the application in accordance with any relevant NPS would lead to the UK being in breach of any of its international obligations;
  - (5): deciding the application in accordance with any relevant NPS would lead to the SoS being in breach of any duty imposed on the SoS by or under any enactment;
  - (6): deciding the application in accordance with any relevant NPS would be unlawful by virtue of any enactment;
  - (7): the SoS is satisfied that the adverse impact of the proposed development would outweigh its benefits.
  - (8): the SoS is satisfied that any condition prescribed for deciding and application otherwise than in accordance with a NPS is met.
- 4.1.4 The relevant NPSs for the Proposed Project are NPS EN-1, NPS EN-3 and NPS EN-5. These NPSs are therefore of primary importance to the decision-maker in considering the need for the project, the consideration of alternatives and its acceptability in terms of the policy guidance contained in them. As set out in **Application Document 7.1 Planning Statement [AS-057]**, the relevant NPSs in the case of the Proposed Project are NPS EN-1, EN-3 and EN-5. NPS EN-3 and NPS EN-5 relate specifically to renewable energy and electricity network infrastructure (respectively) and do not directly address the issue of need . This matter is addressed mainly in NPS EN-1, which sets out the overarching need case for different technologies and infrastructure in its Part 3.
- 4.1.5 The Applicant has noted that a number of written representations and submissions from various Interested Parties seeking to draw the attention of the ExA to key issues surrounding the need for the Proposed Project. In response, this section of the Planning Statement Addendum therefore seeks to reiterate the policy position on need as set out in NPS EN-1 (Department for Energy Security and Net Zero, 2024).

## 4.2 Consideration of Need in NPS EN-1

- 4.2.1 NPS EN-1 (Department for Energy Security and Net Zero, 2024) sets out the Government’s policy for the delivery of major energy infrastructure in England and Wales. Part 3 of NPS EN-1 sets out the urgent need for significant amounts of new large-scale energy infrastructure to meet the government's energy objectives and why it is considered that this need is urgent.
- 4.2.2 In this context, paragraph 3.2.6 of the NPS EN-1 makes it clear that the SoS must assess all applications for development consent for the types of infrastructure covered by NPS EN-1 on the basis that there is a demonstrated need. Paragraph 3.2.7 goes on to state that substantial weight should be given to this need when considering DCO applications. Paragraph 3.2.8 then adds that the SoS *“is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS”*.
- 4.2.3 The role of new electricity network infrastructure in achieving the Government’s energy objectives is detailed further in paragraphs 3.3.65 to 3.3.83, with paragraph 3.3.68 stating that *“the volume of onshore reinforcement works needed to meet decarbonization targets is substantial”*, including *“substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)”*. Paragraph 3.3.83 concludes that:  
  
*“Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy”*.
- 4.2.4 On the basis of this urgent need, the starting point for the SoS’s decision-making process is a presumption in favour of granting consent to DCO applications, unless any specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused (paragraph 4.1.3).
- 4.2.5 NPS EN-1 also establishes, in paragraph 3.3.62, that there is a Critical National Priority (CNP) for low carbon infrastructure.
- 4.2.6 Section 4.2 of NPS EN-1 specifies which technologies are low carbon and are therefore CNP infrastructure. As confirmed by paragraph 4.2.5, energy infrastructure which is directed into the NSIP regime under Section 35 of PA2008 and fit within the definition of low carbon infrastructure, including *“‘bootstraps’ to support the onshore network which are routed offshore”*, constitutes low carbon CNP.
- 4.2.7 However, paragraph 4.2.7 explains that the CNP policy above *“does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure”*, adding that *“the policy applies following the normal consideration of the need case, the impacts of the project and the application of the mitigation hierarchy”*.

## 4.3 The Need for the Proposed Project

- 4.3.1 As set out in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**, the Proposed Project addresses two distinct system needs, which arise

separately in the transmission networks in East Anglia and the South East. Sea Link represents a coordinated approach to solving the above issues using a single solution.

- 4.3.2 As a type of electricity network infrastructure identified in Part 3 of NPS EN-1, the need for the Proposed Project is therefore established through that NPS and substantial weight should be given to this need, as stated in paragraph 3.2.7. In addition, the SoS is not required to consider separately the specific contribution that Sea Link would make to satisfying the need for new electricity network infrastructure, in line with paragraph 3.2.8.
- 4.3.3 This principle is seen in the case of *R (on the application of ClientEarth) v Secretary of State for Business, Energy and Industrial Strategy* [2020] EWHC 1303 (Admin). In this case, the Planning Court dismissed a legal challenge brought by ClientEarth to the decision of the SoS to make a DCO for two gas-fired units and related development at Drax power station in North Yorkshire. While the judgment in this case turns on the recommendations made by the ExA and the SoS's decision letter, in terms of principles of wider application, it confirms that the Overarching National Policy Statement for Energy (NPS EN-1) does not require need for an individual project to be assessed in quantitative terms and that EN-1 specifically gives substantial weight to the qualitative need it establishes.
- 4.3.4 It is explained in **Application Document 7.1 Planning Statement [AS-057]** that the Sea Link Project was identified in *Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 – Annex 2: Networks, connections and network access analysis* (NESO, 2024) as one of three projects that are critical to delivering a network which supports the clean power pathways. The critical and urgent nature of the project is therefore recognised in the strongest terms in this report on achieving Clean Power 2030 objectives. As discussed in Section 2 of this Planning Statement Addendum, the inclusion of the government's Clean Power 2030 Action Plan in the 2026 NPS EN-1 therefore lends further weight to the need case for the Proposed Project.
- 4.3.5 Given that the level of urgency and need for the Proposed Project is established by NPS EN-1, the decision-maker should therefore adopt a starting point of presumption in favour of granting consent unless other policies in the relevant NPSs indicate that development consent should be refused.
- 4.3.6 Although this does not change the general consideration of need (as clarified by paragraph 4.2.7 of NPS EN-1), it is also important to note that, as a project directed into the NSIP regime under Section 35 of PA2008 and defined as a bootstrap, the Proposed Project is classed as low carbon CNP infrastructure for the purposes of NPS EN-1, in accordance with paragraph 4.2.5 of NPS EN-1.
- 4.3.7 As a CNP infrastructure project, the Proposed Project benefits from the presumption in favour of granting consent, unless other policies in the relevant NPSs indicate that permission should be refused. In Section 9 and Appendix A: National Policy Accordance Tables of **Application Document 7.1 Planning Statement [AS-057]**, it is confirmed that the Proposed Project complies with NPS EN-1 and other relevant NPSs. The extent and nature of the residual impacts do not trigger the exceptional circumstances set out in national planning policy to refuse consent and the presumption in favour of granting consent is therefore firmly engaged.
- 4.3.8 In its decision letter granting development consent to National Grid's Bramford to Twinstead Reinforcement Project (Department for Energy Security and Net Zero, 2024), the SoS agreed with the ExA that this project was needed to achieve the national objectives of meeting current and future demand for electricity, increasing energy

security and reducing emissions associated with electricity generation to meet decarbonisation targets. On this basis, in accordance with NPS EN-1, the ExA adopted a starting point of a presumption in favour of recommending a grant of consent unless other policies in the relevant NPSs indicated that development consent should be refused. Paragraph 4.7 of the SoS decision letter then states:

*“In the context of relevant policy, especially the extant NPS EN-1, the ExA attributes great weight to the contribution that the Proposed Development would make toward satisfying the urgent need for new electricity infrastructure in the UK”.*

# 5. Additional Responses to ExA Questions 1SN4 and 1SN5

## 5.1 Introduction

5.1.1 This section of the Planning Statement Addendum provides a further response to the following written questions from the ExA, issued on 17 December 2025 (ExQ1):

- 1SN4 – National Policy Statement for Ports (January 2012)

*“Consider whether the National Policy Statement for Ports (January 2012) (Ports NPS) is an important and relevant matter in relation to the proposed development. If so, provide a summary of which aspects of the Ports NPS are important and relevant and a summary assessment of the proposed development in relation to those aspects as an update to the Planning Statement [AS-057].”*

- 1SN5 – East Inshore and East Offshore Marine Plan:

*“Respond to LGP’s assessment [REP1-142] that the proposed development is in conflict with policies PS1, PS3, DD1 of the East Inshore and East Offshore Marine Plan. Provide an explanation of how the conflict, if any, can be overcome”.*

5.1.2 The Applicant provided an initial response to these two questions at Deadline 3 in **Application Document 9.73 Applicant’s Responses to First Written Questions [REP3-069]**. This section provides a further update, following discussions with key stakeholders.

## 5.2 ExA question 1SN4 – National Policy Statement for Ports

5.2.1 The National Policy Statements for Ports (Department for Transport, 2012) (hereafter the Ports NPS), as indicated in its paragraph 1.2.1, provides *“the framework for decisions on proposals for new port development”* and associated development. Therefore, the Ports NPS does not apply directly to the Proposed Project.

5.2.2 However, the Ports NPS can be considered to be an important and relevant matter in so far as it highlights, in its Section 3.1, the essential role of ports in the UK economy, and in its Section 3.3, the government’s support for: *“sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner”* (paragraph 3.3.1).

5.2.3 The government has decided to update the Ports NPS and has published a draft revised Ports NPS in June 2025, which reiterates the above points in its Section 2.1 (the essential role of ports in the UK economy) and 2.2 (Government policy for ports).

5.2.4 As set out in **Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation** submitted at Deadline 4, port authorities, including the Port of London Authority and London Gateway Port, have highlighted the importance of preserving specific water depths within three Areas of Safeguarded Depth (see Policy PS1 and Policy PS3 below). The ports’ position is that these specific depths are required to avoid

restricting current port activity, as well as restricting the opportunity to expand the ports in the Thames Estuary by accepting larger draught vessels in future, both of which would have a commercial impact.

- 5.2.5 The Applicant is working to agree with these water depth requirements. It can be agreed in principle to safeguard the specified water depths in the majority of these three areas. However further analysis is being undertaken to ensure that the engineering design can achieve sufficient depths in sections where the current water depth is shallower than the threshold requested to be preserved. The Applicant is working to secure this commitment in the appropriate place, with a Requirement in the DCO.
- 5.2.6 On the basis of the above, it is considered that the Proposed Project will not adversely impact future ports development, in line with the key objectives set out in the Ports NPS.

## 5.3 ExA question 1SN5 – East Inshore and East Offshore Marine Plan

- 5.3.1 The London Gateway Port Limited (LGPL)'s position, set out in its written representation **Written representations (WR) and summaries for any that exceed 1500 words [REP1-142]** from Addleshaw Goddard LLP on behalf of London Gateway Port Limited, is that the Proposed Project conflicts with Policy PS1, PS3 and DD1 of the East Inshore and East Offshore Marine Plan.

### Policy PS1

- 5.3.2 Policy PS1 of the East Inshore Marine and East Offshore Marine Plan states that proposals requiring static surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization designated routes.
- 5.3.3 No static sea surface infrastructure is proposed as part of the Offshore Scheme.
- 5.3.4 Reduction in under-keel clearance due to cable burial protection, displacement of rocks and creation of berms and other seabed disturbances is considered in **Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation** submitted at Deadline 4. The assessment concludes that the residual effect from reduction in under-keel clearance is moderate and unlikely to be significant (As Low As Reasonably Practicable).
- 5.3.5 In line with Maritime and Coastguard Agency (MCA)'s guidance, it is not planned to reduce the existing navigable water depth by more than 5% along any section of the cable (with respect to Chart Datum), as the main method of cable protection for Sea Link is lowering below the seabed. However, at some cable crossing locations in shallow water, water depth may be reduced more than 5% with regard to Chart Datum. In line with MCA guidance, these potential locations have been discussed with the MCA and identified within **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**, with further detail given in **Applicant Document 9.96 Water Depth Baseline Study – Shipping and Navigation Technical Note** (submitted at Deadline 4), and the Applicant will discuss further with the MCA on these locations.

- 5.3.6 Areas of the Offshore Scheme which are of particular concern for key stakeholders, in relation to the issue of under-keel clearance are detailed in **Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation** submitted at Deadline 4 and **Application Document 6.3.4.7.A (C) Navigational Risk Assessment** (submitted at Deadline 4). They include three Areas of Safeguarded Depth which have been highlighted by the Port of London Authority, as well as London Gateway Port, where specific water depths must be safeguarded.
- 5.3.7 The Applicant is working to agree with these water depth requirements. It can be agreed in principle to safeguard the specified water depths in the majority of these three areas. However further analysis is being undertaken to ensure that the engineering design can achieve sufficient depths in sections where the current water depth is shallower than the threshold requested to be preserved. The Applicant is working to secure this commitment in the appropriate place, with a Requirement in the DCO.
- 5.3.8 Based on the assessment presented in **Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation** submitted at Deadline 4, it is therefore concluded that the Proposed Project will not significantly reduce under-keel clearance, in accordance with Policy PS1.

## Policy PS3

- 5.3.9 Policy PS3 requires proposals to demonstrate “*that they will not interfere with current activity and future opportunity for expansion of ports and harbours*”. However, if a proposal interferes with current activity and future opportunity for expansion, it is required to demonstrate how this will be minimised or mitigated.
- 5.3.10 As set out in **Application Document 6.2.4.7 (C) Part 4 Marine Chapter 7 Shipping and Navigation** submitted at Deadline 4, port authorities, including the London Gateway Port, have highlighted the importance of preserving specific water depths within three Areas of Safeguarded Depth (see Policy PS1). The ports’ position is that these specific depths are required to avoid restricting current port activity, as well as restricting the opportunity to expand the ports in the Thames Estuary by accepting larger draught vessels in future, both of which would have a commercial impact.
- 5.3.11 To address the concerns of port authorities, an engineering review is being undertaken to inform the Project’s intention to agree Areas of Safeguarded Depth and ensure that such a commitment is practicable. As already mentioned above, the Applicant is working to secure this via a Requirement in the DCO in order to preserve the specific dredge depths in the three key areas and meet the port stakeholders requirement that future ports expansion is therefore not impacted.
- 5.3.12 The Proposed Project will therefore seek to mitigate any interference with current activity and future opportunities for expansion of ports and harbours. This is line with Policy PS3.

## Policy DD1

- 5.3.13 Policy DD1 relates to proposals within or adjacent to licensed dredging and disposal areas, requiring them to demonstrate that they will not adversely impact dredging and disposal activities. If there are adverse impacts on dredging and disposal, proposals should seek to minimise, or mitigate, these impacts.

- 5.3.14 **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** outlines in its Section 4.2 how the Applicant's proposed marine works (Work No 6) will safeguard water depth and ensure that dredging in the relevant parts of the Sunk Pilot Boarding area can proceed to a depth of 22 m below Chart Datum (CD).
- 5.3.15 As stated above, an engineering review is being undertaken to inform the Proposed Project's intention to agree Areas of Safeguarded Depth, which would be secured via a Requirement in the DCO.
- 5.3.16 The Proposed Project will therefore mitigate any adverse impacts on licensed dredging and disposal areas, as required by Policy DD1.

## Summary

- 5.3.17 It is concluded that the Proposed Project complies with Policies PS1, PS3 and DD1 of the East Inshore and East Offshore Marine Plan.

# 6. Special Qualities of the Suffolk & Essex Coast & Heaths AONB

## 6.1 Introduction

6.1.1 The Applicant submitted **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. This technical note sets out the Applicant's consideration of the duty to seek to further the purpose of conserving and enhancing the natural beauty of the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (AONB) in accordance with Section 85(A1) (s85) of the Countryside and Rights of Way Act 2000 (CRoW Act). AONBs have been rebranded National Landscapes, but the Suffolk & Essex Coast & Heaths National Landscape is referred to as an AONB in the DCO application documentation and in this document, as the name change is not statutory.

6.1.2 NE has provided detailed comments on the aforementioned technical note at Deadline 3, in Table 2 of **Appendix H3 Natural England's Advice on Suffolk LVIA [REP3-120]**. Commenting on paragraph 1.2.3 of the technical note (in Reference 7 of Table 2), NE states:

*"We advise that the referenced Planning Statement does not provide a detailed appraisal of the impact of the scheme on the special qualities of the Protected Landscape.*

*In addition, the referenced Planning Statement refers back to Document 6.3.2.1C Part 2 Suffolk Chapter 1 Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk for a full assessment. We continue to advise that Document 6.3.2.1C does not appear to include a full assessment of impacts on special qualities as set out in the Management Plan.*

*This is because the table does not clearly include the full suite of Special Qualities indicators and accompanying narrative/evidence informing assessment parameters and evidence to substantiate conclusions made".*

6.1.3 Consequently, NE advises, in reference 7 of Table 2, that the planning statement and relevant documents are updated accordingly. In response to NE's advice, the assessment initially set out in **Application Document 7.1(B) Planning Statement [AS-057]** has been updated to provide further details on how the sub-factors of the Special Qualities Indicators have the potential to be affected by the Proposed Project. This is presented below in Table 6.1 Special Qualities Indicators and their Sub-Factors.

## 6.2 Assessment of the impacts of the Proposed Project on the Special Qualities of the AONB

6.2.1 The Special Qualities of the Suffolk & Essex Coast & Heaths AONB are set out in the *Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) – Natural Beauty and Special Qualities Indicators v1.8* (LDA Design, 2016).

**Table 6.1 Special Qualities Indicators and their Sub-Factors**

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057]
<b>Health and Well-being</b>		
Access along defined routes for walking and cycling	<p>Access along defined walking and cycling routes within the Suffolk &amp; Essex Coast &amp; Heaths AONB is a valued aspect of the landscape, supporting recreation, enjoyment of natural beauty, and community health and well-being.</p> <p>An assessment of the impact of the Suffolk Onshore Scheme on Public Rights of Way and recreational routes is set out in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism (REP1A-006)</b>. The assessment of PRoW and recreational routes considers the impact on accessibility and recreational use. The impacts are those that result in changes in the quality of the route, the user experience, journey lengths/times, local travel patterns and any potential severance to local facilities. Within the AONB, the following walking routes intersect the Order Limits and have been assessed:</p> <ul style="list-style-type: none"> <li>• Footpath 103/006/0 and the Suffolk Coast Path;</li> <li>• Aldeburgh and Thorpeness Walk and King Charles III England Coastal Path;</li> <li>• Unnamed Permissive Footpath; and</li> <li>• Footpath 103/016/0.</li> </ul> <p>Where required, appropriate temporary diversions and management measures will be implemented, as set out in</p>	<p>The conclusions reported in Table F.1 of <b>Application Document 7.1 Planning Statement [AS-057]</b> of a small magnitude of effect on Health and Well-being during construction and operation (and maintenance) remains justified.</p>

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p><b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]</b>, to maintain safe and continuous access for users throughout the construction period. These measures include clear signage, advance notice of changes, and the prioritisation of PRow users where routes intersect with construction activities. Any diversions will be of comparable length and quality to the existing routes, ensuring that changes to journey length, user experience and accessibility are minimised. With these measures in place, effects on PRow and recreational route users are expected to be negligible or minor adverse, and therefore no significant adverse effects are anticipated.</p> <p><b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> considers the conclusions set out in <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> and <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-006]</b> to assess the likely significant effects on the accessibility of PRow and active travel networks in the study area which may impact the health and wellbeing of local residents. As no permanent severance is anticipated and any disruptions would be temporary and mitigated through appropriate diversions of comparable length and quality, the assessment concludes that there would be no likely significant effects on health and wellbeing arising from changes to access along defined walking and cycling routes within the AONB.</p>	
Open access to areas of semi-natural landscape	Open access to areas of semi-natural landscape within the Suffolk & Essex Coast & Heaths AONB provides important opportunities	

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**Special Qualities Indicator  
Sub-Factor**

**Effects arising from Suffolk Onshore Scheme**

**Effects reported in Table F.1 in  
Appendix F of Application  
Document 7.1 (C) Planning  
Statement [AS-057])**

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for recreation, connection with nature, and the health and well-being of local communities and visitors.

An assessment of the impact of the Suffolk Onshore Scheme on open spaces is set out in **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-006]**. The assessment of open spaces considers the impact on receptors in terms of induced severance and land take impacts. Within the AONB, the following open spaces intersect the Order Limits and have been assessed:

- Aldeburgh Beach; and
- North Warren Royal Society for the Protection of Birds (RSPB).

As set out in Section 10.9, there will be no land take required from Aldeburgh Beach arising from the construction and operation of the Suffolk Onshore Scheme, and therefore no effect on the open space. A temporary access route would be required across the North Warren RSPB. During the trenchless cable installation, an existing track across the open space will be used by a quadbike or 4x4 vehicle for monitoring purposes approximately four times a day. Given the impact will be temporary in nature and will not lead to a change in the integrity of the open space, the effect on the North Warren RSPB is assessed to be minor adverse and not significant.

The assessment of severance is informed by the findings in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, whereby it is concluded that there are no roads or PRow assessed that would experience significant severance effects during construction. Therefore, there would be no severance effects between residents and open spaces in the

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Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p>AONB as a result of the construction of the Suffolk Onshore Scheme.</p> <p><b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> considers the conclusions set out in <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> and <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-006]</b> to assess the likely significant effects on access to open space, leisure, and play, which access and amenity effects may impact the health and wellbeing of local residents. Given that no significant severance of routes or loss of open space is anticipated, and that impacts within the AONB are limited, temporary, and minor in nature, the assessment concludes that there would be no likely significant effects on health and wellbeing arising from changes in access to open space.</p>	
Opportunities for active and passive recreation	<p>Opportunities for active and passive recreation within the Suffolk &amp; Essex Coast &amp; Heaths AONB are closely linked to the assessment of access along walking and cycling routes, and open access to semi-natural areas. Both of these sub indicators are considered to provide opportunities for recreation, including active travel, physical activity, wildlife observation and enjoyment of the landscape. As set out above, there is no significant effect identified on PRow and recreational routes and open spaces within the AONB. Therefore, there are not anticipated to be any significant effects on the opportunity for active travel and passive recreation in the AONB.</p>	
<b>Community</b>		

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
Relationship between people and place	<p><b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> assesses the determinant <i>Social Cohesion and Community Identity</i>, defined by IEMA (2022) as the potential for adverse impacts on health and wellbeing arising from disruption to community connectivity and changes to landscape and visual amenity, which may affect mental health. This determinant explicitly recognises the importance of people’s sense of control over, and connection to, their living environments, and therefore the relationship between people and place.</p> <p>The assessment draws on evidence from multiple environmental disciplines to provide a comprehensive understanding of potential effects on communities, including:</p> <ul style="list-style-type: none"> <li>• <b>Traffic and Transport:</b> considering the risk of community severance where increased traffic or disrupted routes may reduce connectivity between communities. This considers potential for driver delay and severance.</li> <li>• <b>Landscape and Visual:</b> considering visual effects on views from residents, prowl users, and recreational users whose enjoyment of landscape character may be disrupted; and</li> </ul> <p><b>Socio-economics:</b> considering impacts on local facilities in terms of physical changes or disruptions to residential communities, and the accommodation sector, recognising that social cohesion may be affected by 'changes to living and working environments'.</p> <p><b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> concludes that with appropriate mitigation, identifies no significant effects on community severance or driver delay as a result of the construction of the</p>	<p>The conclusions reported in Table F.1 of <b>Application Document 7.1 Planning Statement (C) [AS-057]</b> of a small magnitude of effect on the Community during construction and operation (and maintenance) remains justified</p>

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057]
	<p>Suffolk Onshore Scheme. Similarly, <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-006]</b> identifies no significant effects on residential communities or accommodation facilities. In addition, <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b> and <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]</b> also find no significant effects from the Proposed Project alone on the AONB or its setting.</p> <p>Taking these findings together, and having regard to the limited extent, temporary nature, and localised scale of potential effects, the impact on social cohesion and community identity is assessed as not significant during both construction and operation. Overall, the evidence does not indicate a likely significant effect on the relationship between people and place, or on associated health and wellbeing outcomes, within or around the AONB.</p>	
<b>Economy</b>		
Landscape, community and economy closely intertwined	<p>The natural landscape of the Suffolk &amp; Essex Coast &amp; Heaths AONB is a valued environmental asset and forms an important component of the local visitor economy in East Suffolk. The quality of the landscape, including its scenic value and tranquillity, underpins recreational use, tourism activity and community well-being, and these elements are therefore closely interconnected. Tranquillity is a perceptual aspect of the landscape and the extent to which this is altered forms part of the judgement on effects reported on landscape character. The Applicant acknowledges adverse effects on landscape character during construction and operation (and maintenance) as summarised in <b>Application</b></p>	<p>The conclusions reported in Table F.1 of <b>Application Document 7.1 (C) Planning Statement [AS-057]</b> of a small magnitude of effect on the Economy during construction and negligible magnitude of effect during operation (and maintenance) remain justified.</p>

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p><b>Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b> and detailed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]</b>. The factors that would affect the perceptual aspects of the landscape character, including tranquillity, would be more pronounced during the construction phase of the Proposed Project, relating to construction noise and movement of plant and general construction activity.</p> <p>Significant adverse effects would remain on landscape character during the operational (and maintenance) phase of the Proposed Project, however the effects would be localised. In Suffolk this would be limited to an approximate 2 km area from the Saxmundham Converter Station site. This radius does not extend into the AONB.</p> <p>Given the localised and temporary nature of construction effects, and the absence of significant operational effects within the AONB, the Applicant does not consider that the identified landscape effects would materially affect the local tourist economy. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity as detailed in <b>Application Document 9.40 Visitor and Tourism Assessment Technical Note - Suffolk [REP3-066]</b> and <b>Application Document 9.41 Visitor and Tourism Assessment Technical Note - Kent [REP3-066]</b>. The Applicant's review of published monitoring reports of actual impacts on tourism observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On</p>	

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p>that basis there is limited robust evidence to suggest that negative visitor perception identified and observed in surveys prior to construction will result in material adverse effects on the local tourism economy. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme.</p>	
Ecosystem Goods and Services		
<p>Landscape delivers broad range of ecosystem goods and services (provisioning, cultural and regulating)</p>	<p><b>Provisioning services</b></p> <p>Agricultural land and managed plantations within the Suffolk Coast and Heaths AONB contribute to the provision of food, fibre and biomass, contributing to the area’s working rural landscape. The AONB is characterised by a mosaic of agricultural land uses shaped by variable soils and coastal influences, supporting a combination of productive arable land, permanent pasture and woodland.</p> <p>Predictive Agricultural Land Classification (ALC) modelling indicates that land within the Order Limits is dominated by Grade 3 agricultural land, including areas of higher quality Grade 3a, alongside Grade 3b and more constrained areas of Grade 4 land, with smaller localised pockets of Grade 2 agricultural land. In total, 67.75% of the land within the Order Limits is predicted to be of Best and Most Versatile land, this distribution reflects the transitional nature of the soils across the coastal heath and farmland landscape. Detailed ALC surveys will be completed by March 2026 to confirm the actual land grades and the characteristics of the soils present.</p> <p>Satellite imagery confirms a mixed pattern of arable cultivation and permanent pasture across the route, broadly corresponding to areas of higher and moderate capability The landscape supports a</p>	<p>The conclusions reported within Table F.1 of <b>Application Document 7.1 (C) Planning Statement [AS-057]</b> of a small magnitude of effect on Ecosystem Goods and Services at construction and operation remain justified.</p>

Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p>range of livestock grazing activities, including sheep, horses and pigs, contributing to local food production and the maintenance of local pastoral character.</p> <p>The Proposed Development would require approximately 11.59 ha of permanent land take, of which 11.45 ha is predicted to comprise BMV land. The main areas of permanent land take affecting agricultural land lie outside the AONB. Areas of land required and disturbed temporarily would be reinstated to pre-construction condition, including the restoration of ALC grade, following good practice soil handling and restoration measures as set out in the <b>Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]</b>. This will ensure that temporary impacts during construction are reversed by the end of the construction phase. The detailed assessment of effects on agricultural land quality and soils is provided in <b>Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]</b>.</p>	
	<p><b>Cultural services</b></p> <p>Community facilities, open spaces and tourist attractions contribute to the cultural identity of the Suffolk &amp; Essex Coast &amp; Heaths AONB.</p> <p>An assessment of the impact of the Suffolk Onshore Scheme on community facilities, open spaces and tourist attractions is set out in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b>. The assessment considers the impact on receptors in terms of induced</p>	

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**Special Qualities Indicator  
Sub-Factor****Effects arising from Suffolk Onshore Scheme****Effects reported in Table F.1 in  
Appendix F of Application  
Document 7.1 (C) Planning  
Statement [AS-057])**

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severance and land take impacts. There are no community facilities located the following receptors are located within 500 m of the Order Limits within the AONB. The following open spaces and tourist attractions are located within or up to 500 m from the Order Limits and fall within the AONB:

- Aldeburgh Beach;
- North Warren RSPB;
- The Scallop at Aldeburgh Beach; and
- The Red House.

As set out in Section 10.9, there will be no land take required from Aldeburgh Beach, The Scallop at Aldeburgh Beach and The Red House arising from the construction and operation of the Suffolk Onshore Scheme, and therefore no effect on the open space. A temporary access route would be required across the North Warren RSPB. During the trenchless cable installation, an existing track across the open space will be used by a quadbike or 4x4 vehicle for monitoring purposes approximately four times a day. Given the impact will be temporary in nature and will not lead to a change in the integrity of the open space, the effect on the North Warren RSPB is assessed to be minor adverse and not significant.

The assessment of severance is informed by the findings in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, whereby it is concluded that there are no roads or PRow assessed that would experience significant severance effects during construction. Therefore, there would be no severance effects between residents and open spaces and community facilities in the AONB as a result of the construction of the Suffolk Onshore Scheme.

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**Regulating services (regulating climate, carbon storage and climate change adaptation)**

Effects on climate-related regulating ecosystem services – namely regulating climate, carbon storage and climate change adaptation – are linked to the greenhouse gas (GHG) assessment and climate change risk assessment in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]**.

The lifecycle GHG assessment in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** accounts for the carbon lost from soil and vegetation due to land use change. Although construction of the Suffolk Onshore Scheme is estimated to result in a loss of approximately 2,177 tCO<sub>2</sub>e due to land use change, carbon sequestrations at the Suffolk Onshore Scheme due to land use over the operational life of the scheme are estimated as 3,245 tCO<sub>2</sub>e. This means that the carbon lost from the ecosystem's carbon sinks during construction is sequestered over the operational life of the Suffolk Onshore Scheme. Therefore, no significant effect is anticipated on the ecosystem's ability to store carbon.

Since the impact of the Suffolk Onshore Scheme on the ecosystem's carbon sinks is not significant, the scheme is, consequently, not anticipated to have a significant influence on the ecosystem's carbon cycle. Therefore, the Suffolk Onshore Scheme is not anticipated to have a significant effect on the ecosystem's ability to regulate climate.

The climate change risk assessment in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** accounts for measures and controls embedded in the design to

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Special Qualities Indicator Sub-Factor	Effects arising from Suffolk Onshore Scheme	Effects reported in Table F.1 in Appendix F of Application Document 7.1 (C) Planning Statement [AS-057])
	<p>adapt to climate change risks, including the flood controls discussed in <b>6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]</b>. The effect of climate change risk on the Suffolk Onshore Scheme is deemed not significant in APP-085. By embedding climate change adaptation into the design, the Suffolk Onshore Scheme is not anticipated to have a significant effect on the ecosystem's adaptation to climate change.</p>	
	<p><b>Regulating services (water storage, flood defence and flood prevention)</b></p> <p>Effects on the regulating ecosystem services of water storage, flood defence and flood prevention are assessed in <b>Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]</b>. The Suffolk Onshore Scheme has a range of measures and controls embedded into its design to avoid effects on the regulating services of the landscape with regard to water storage, flood defence and prevention. These includes measures to control any temporary during construction, as well as longer term effects during operation of the Project. Examples include Sustainable Drainage designs to manage surface water runoff from the Project, providing for its infiltration and/or attenuation and treatment, as well as the designs of watercourse crossings in accordance with a range of parameters to prevent obstruction to flows and increased fluvial flood risk. The measures are detailed in and secured through inclusion within <b>Application Document 9.83 Outline Code of Construction Practice [REP3-076]</b>.</p>	



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