

Cabinet

Report Title:	Sea Link Statutory Consultation Response (Preliminary Environmental Impact Report stage)
Meeting Date:	12 December 2023
Lead Councillor(s):	Councillor Richard Rout, Cabinet Member for Environment and Finance
Local Councillor(s):	Aldeburgh and Leiston – Councillor T-J Haworth Culf Blything - Councillor Richard Smith Kessingland and Southwood - Councillor Michael Ladd Wilford – Councillor Andrew Reid
Director:	Andrew Cook, Executive Director of Growth, Highways and Infrastructure
Assistant Director or Head of Service:	Michael Moll, Head of Programmes and Programme Management Office (PMO) James Cutting, Head of Planning
Author:	Roly Arbon, Project Manager (PMO), 01473 260013, Roland.arbon@suffolk.gov.uk

Brief summary of the item to be considered

1. The Sea Link project is an electricity grid reinforcement scheme, creating an undersea link between Suffolk and Kent, and includes onshore infrastructure, underground cabling from Aldeburgh to a converter station to the southeast of Saxmundham, then further underground cabling to the consented, but as yet unbuilt, substation at Friston. It is a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, therefore the Secretary of State at the Department of Energy Security & Net Zero (DESNZ) will decide on this scheme, on the advice of the Planning Inspectorate (PINS).
2. Following the first non-statutory round of public consultation in late 2022, and technical discussions with host authorities, the promoter, National Grid Electricity Transmission (NGET), has begun a second, statutory round of public consultation, running from 24 October to 18 December 2023, in advance of the submission of an application of a Development Consent Order (DCO). This DCO application is expected to be submitted in autumn 2024 to PINS as examining authority. PINS is expected to conduct an examination beginning with a preliminary meeting in Spring 2025, following the examination, a recommendation will be made to the relevant Secretary of State, with a decision expected in Spring 2026. It is expected that timings will be scheduled to avoid electoral moratoriums.
3. It is important to note that the local authorities are not the ultimate decision maker in the NSIP planning process, although they are statutory consultees with a key role to play.

What is Cabinet being asked to decide?

4. That following agreement by the Cabinet, the draft Statutory Consultation response for Sea Link set out in Appendix 1, subject to any agreed amendments, be submitted to the promoter of the Sea Link proposal, National Grid Electricity Transmission (NGET), setting out the following key issues:
 - a) Although the principle of subsea interconnectors is an important aspect of an offshore centred coordinated approach, at this point, the outcomes of the Offshore Coordination Support Scheme (OCSS) and the review of connections in East Anglia, that is due to be undertaken by National Grid Electricity System Operator, are unknown. Therefore, it is not possible to come to a reasonably informed preliminary conclusion about the Sea Link project.
 - b) The County Council considers that the lack of coordination with the National Grid Ventures' LionLink proposal is a very substantial and significant issue. The County Council considers that the Sea Link and LionLink projects in Suffolk must fully coordinate consenting, construction, and operation, and that it is the responsibility of the National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise the harm to the environment and the communities of Suffolk.
 - c) Recognising that the Sea Link proposals have been designed to coordinate with other projects with regards to the landfall at Aldeburgh, the converter station site east of Saxmundham, and the cable corridor from landfall to the converter station via the proposed substation at Friston; failure for LionLink to coordinate with Sea Link would likely lead to the recommendation that the County Council objects to the LionLink proposals at the next stage of its consultation. This is based on the recent supplementary non-statutory consultation on LionLink, which put forward landfall options at Southwold and Walberswick; these options fail to coordinate with the Sea Link proposals' landfall and cable routing to the converter station site.
 - d) In addition, the Sea Link proposals as currently presented by National Grid Electricity Transmission have significant challenges and a number of technical issues
5. That the Cabinet Member for Environment & Finance writes to National Grid Group and the Department for Energy Security and Net Zero (DESNZ), asking them to ensure full alignment of the project development of LionLink and Sea Link, and for them to request that the Planning Inspectorate (PINs) considers both projects simultaneously, using a single panel of examiners, to achieve coordinated consenting.
6. That the Executive Director of Growth, Highways, and Infrastructure, in consultation with the Cabinet Member for Environment & Finance, be authorised to make amendments to the draft Statutory Consultation response, prior to its submission to NGET.
7. That Cabinet grants the Executive Director of Growth, Highways, and Infrastructure, in consultation with the Cabinet Member for Environment & Finance, the delegated authority to fully engage with the Pre-submission and

Pre-examination stage of the Development Consent Order process in relation to the Sea Link proposals, in order to pursue the concerns identified

Reason for recommendation

8. The Council is a statutory consultee for Nationally Significant Infrastructure Projects (NSIPs). Cabinet agreed the Council's updated Energy and Climate Adaptive Infrastructure Policy at its meeting on 16 May 2023, which indicates the predisposition of the Council to support projects that are necessary to deliver Net-Zero Carbon for the UK. However, to be able to support a project, the Council expects that any impacts are appropriately dealt with. Links to the Policy are provided under the 'Sources of Further Information' section below.
9. Due to the outcomes of the Offshore Coordination Support Scheme (OCSS) and the National Grid Electricity System Operator review of connections in East Anglia still being unknown, the County Council is not in a position to come to a reasonably informed preliminary conclusion regarding the Sea Link proposals.
10. However, it is important for the County Council to clearly set out its concerns to the promoter at this stage, before the DCO application is submitted.

What are the key issues to consider?

11. Cabinet needs to consider whether the key issues raised in this report and summarised in Recommendation 1 are appropriate and comprehensive, considering the information made available about the project, by its promoter. These issues, with the addition of technical detail, will be submitted in the County Council's consultation response, a draft being included in Appendix 1.

How does this relate to the County Council objectives?

12. This report is linked to the County Council's objectives indicated below:

Promoting and supporting the health and wellbeing of all people in Suffolk	<input checked="" type="checkbox"/>
Strengthening our local economy	<input checked="" type="checkbox"/>
Protecting and enhancing our environment (including carbon reduction)	<input checked="" type="checkbox"/>
Providing value for money for the Suffolk taxpayer	<input checked="" type="checkbox"/>

How will this impact on the Council's objectives?

13. It is recognised that proposals for upgrading and increasing the capacity of the electricity grid, with Sea Link being one of the specific proposals, which work towards achieving the UK's Net Zero and Energy Security objectives, a project of this scale will have significant impacts on the host communities in Suffolk, including the wellbeing of the residents in these communities.
14. There is potential for the project to strengthen the local economy, through construction and operation, which will require local resources in terms of both materials and employment. The County will seek agreement with the developer to provide training opportunities for the locally based workforce.

15. The proposed grid reinforcement will unlock further potential for sources of low carbon energy generation off the coast of Suffolk, in particularly offshore windfarms and increase existing resilience in the National Grid network. Failure to provide an enhanced energy supply network would result in these potential sources of generation not being fully utilised. However, it is also recognised that a project of this scale has impacts on the local natural environment and communities.

What are the resource and risk implications?

16. A Planning Performance Agreement (PPA) to cover the cost of the Council's involvement thus far, and up to Examination, is close to agreement with the developer. This will allow the Council's engagement in the process to be cost neutral to the Council, and therefore provide value for money for the Suffolk taxpayer. The Council will also seek fees for highways agreements and permits, as well as the costs of officer time to monitor management plans.
17. Apart from officer time invested, there would not be a direct financial risk to the County Council. However, if mitigation and compensation provided by the promoter is insufficient to alleviate impacts caused by the project, this could lead to harm being caused to the local natural environment and communities.

Equality Impact Assessment Screening

18. An Equalities Impact Assessment Screening (EIA) was undertaken and there is no identified impact on people with any particular protected characteristics. Although both positive and negative impacts on people in rural areas and those at socio-economic disadvantage, have been identified.
19. However, it is not considered that the Sea Link grid reinforcement proposals, and the response of SCC to it, will have any differential impact on people due to any of the identified protected characteristics. The EIA Screening can be found here: <https://pandp.suffolk.gov.uk/> by entering 'Sea Link' into the 'Document Title' search box.
20. The Cabinet are directed to consider the information provided within the EIA before making its decision.

What are the timescales associated with this decision?

21. Suffolk County Council's response to the Statutory Consultation stage of the Sea Link proposals is due to be submitted at the close of the consultation on 18 December 2023.
22. The anticipated timescale for the submission and examination for the remaining Development Consent Order (DCO) process is as follows: -
 - a) Submission of DCO application Q3/Q4 2024
 - b) Examination by PINs Q1-Q3 2025
 - c) Secretary of State decision Q1 2026
 - d) Construction 2026-2030

Alternative options

23. The alternative option to that set out in the recommendation is as follows; -

That Suffolk County Council formally object to the Sea Link proposal as it is currently presented, which would be on the grounds that National Grid Group have failed to adequately coordinate the project with the Lion Link proposals, put forward by another National Grid subsidiary, National Grid Ventures. An objection at this stage, on these specific grounds, could only be a holding objection, given that National Grid may be able to resolve this matter at the next stage of consultation.

24. However, such an objection to the Sea Link proposals at this stage may be considered unreasonable and would hence lack credibility, given that the Sea Link project has, as it is currently presented, been designed to allow for a full coordination of landfall, cable corridors and converter stations with LionLink.
25. Notwithstanding that, given that the offshore coordination support scheme (OCSS) and National Grid Electricity System Operator review of connections in East Anglia is not complete; the role, function, benefits and impacts of the Sea Link project are not fully understood, hence any formal objection at this stage would also be premature.
26. There will be an opportunity for Cabinet to consider this matter again, at the submission of the Development Consent Order, (DCO) as part of the preparation of the Relevant Representations.

Who will be affected by this decision?

27. Suffolk residents, businesses, visitors, and the environment will be affected by the Secretary of State's decision regarding these proposals.

Main body of report

Introduction

28. The project is one of a significant number of Nationally Significant Infrastructure Projects (NSIPs) that are proposed, being approved, or affect Suffolk. Through work on other NSIPs, the County Council has built up a considerable level of expertise and is nationally recognised as a Centre of Excellence in dealing with NSIPs.
29. The following summarises Suffolk County Council's (SCC) draft comments in response to the Statutory Consultation stage, including the Preliminary Environmental Information Report (PEIR), for the Sea Link proposals held between 24th October and 18th December 2023 by National Grid Electricity Transmission (NGET).
30. The proposals consist of the construction of 2GW High Voltage Direct Current (HVDC) undersea electricity link between Suffolk and Kent, with the onshore infrastructure in Suffolk consisting of a converter station, onshore Direct Current (DC) cables, onshore Alternating Current (AC) cables and a transition bay. The AC cables will connect the converter station to the consented but as yet unbuilt NGET substation at Friston in East Suffolk, which will entail its extension.
31. Sea Link has been designed to coordinate with two further projects with regards to the option to provide additional ducts from the landfall along the cable corridor and the size of plot for the converter station site.
32. The SCC electoral divisions which will be directly affected by the scheme include the following: -

- Aldeburgh and Leiston
- Blything
- Kessingland and Southwold
- Wilford

Policy context

National Policy

33. The County Council acknowledges the need to increase renewable energy generation, the increasing demand for new additional generation and the UK Government's legal obligation to achieve Net Zero emissions by 2050, as supported by research and publications by the Committee for Climate Change.
34. The Government issued the revised version of the National Policy Statements on 22 November 2023, with the amendments having full effect in relation to 'those applications for development consent accepted for examination, after the designation of those amendments', which will include the Sea Link proposals.
35. The National Policy Statement, EN-1, is the UK Government's overarching strategy for energy. The County Council would like to draw the applicant's attention to the following assessment requirements: -
 - *'Applicants for Critical National Priority (CNP) infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.'*
 - *'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced, or mitigated.'*
 - *'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. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered'*
36. The National Policy Statement (EN-5) is the UK Government's strategy for electricity network infrastructure. This policy statement applies to transmission systems and associated infrastructure (e.g. substations) and sets out the general principles that should be applied in the assessment of the application for development consent.

The County Council's Energy and Climate Adaptive Infrastructure Policy

37. The County Council has declared a climate emergency and is therefore predisposed to support projects which are necessary to deliver Net Zero Carbon for the United Kingdom (UK).
38. The County Council updated its energy infrastructure policy in May 2023, setting out its overall stance on projects required to deliver Net-Zero Carbon for the UK.

However, proposals will not be supported unless the harms of the projects alone, as well as cumulatively and in combination of other projects, are adequately recognised, assessed, appropriately mitigated, and if necessary, compensated.

39. The policy also sets out how, in principle, the County Council will engage with and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions. The County Council expects to have comprehensive and effective engagement with developers and their supply chain partners to maximise the local business opportunity, skills aspirations, and employment benefits. Where appropriate, the County Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.
40. The County Council expects projects to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation. Also, in accordance with the requirements of the regulator, Ofgem, Environmental Net Gain.
41. In addition, as part of the County Council's NSIP Centre of Excellence, the Council is currently developing guidance supplementary to this policy, to provide a strong technical steer to project promoters of future NSIP applications as to what they have to consider and should provide to the Council, in terms of assessment approaches and types of mitigations. This will leave the County Council in a stronger position for future engagement and negotiations with project promoters.

Need for the project

42. NGET makes a case for its need to reinforce the network in, and between East Anglia and the south-east of England, for four main reasons:
 - i) The existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore)
 - ii) The growth in offshore wind, interconnectors, and nuclear power means that more electricity will be generated in the years ahead than the current network is able to transport securely and reliably
 - iii) As a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses
 - iv) Upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of power required, whilst operating to the required standards of network resilience.
43. NGET states that, before considering building new parts of the network, it considers if existing network infrastructure can be upgraded, e.g. by building new substations, improving the transmission circuits using thicker conductors/wires on existing overhead lines, or adding smart power control devices to control the flow of electricity on parts of the network where power is needed. However, according to NGET, these upgrades do not adequately address the shortfall in network capacity and several new network reinforcement projects are required, of which Sea Link is one.

44. According to NGET, Sea Link deals simultaneously with overcoming constraints in East Anglia, by connecting new power generation, and reinforcing the Bramford to Sizewell radial circuits transferring power from the Sizewell Generation Group. While also in the South East of England, increasing the amount of power that can be transported to and from the south-east, helping to meet domestic demand as well as manage imports and exports of electricity between Europe and the UK, via interconnectors.
45. Therefore, it should be noted in particular that in the strategic options report included in this consultation by National Grid states that:

"To enable power transfer from the Sizewell Generation Group, it is necessary for all options to have a northern connection point in the Sizewell area."

Consideration of Alternatives

46. Four options are considered by National Grid in the detailed strategic options report. Three offshore connection options, and one alternative onshore pylon option were considered. The alternative onshore option was identified as LL1, between Sizewell and Canterbury, although this had lowest capital cost, the lifetime costs were higher, the lifetime costs were increased by the likely cost and complexity associated with tunnelling under the river Thames. Therefore, this alternative option was not considered any further by NGET.
47. In September 2023 Suffolk, Norfolk, and Essex county councils published a report that they had commissioned from Hirons Smart Energy Networks, to review the NGET proposals for East Anglia network reinforcement, with a focus on the need for, and timing of, the proposed 400 kV line from Norwich to Bramford to Tilbury.
48. The report found that the need case for the Norwich to Tilbury pylon line was flawed, and that it was therefore unlikely to be required before 2035. The report also found that the timely development of the Bramford to Twinstead pylons and the Sizewell to Richborough HVDC link, (Sea Link) provides an opportunity to pause the development of the Norwich to Tilbury pylons, until future generation requirements a clearer and the need case has been reviewed.

Project Engagement

49. The County Council has been disappointed with the quality of engagement on the proposals, both with its technical departments and with the community, particularly around socio-economic and tourism issues.
50. Thematic meetings have failed to engage with all technical stakeholders in some areas, including the Lead Local Flood Authority (LLFA) not having a meeting in advance of the release of the Statutory Consultation.

Key issues for the draft response

Sea Link designs to allow for coordination with other projects

51. The County Council maintains its stance that coordination between projects, including the utilisation of immediately adjacent parallel onshore cable routing, should be a top priority in order to minimise the impacts upon the Suffolk coastline.
52. The County Council expects that the laying of additional ducts will be undertaken if there is any possibility that further projects could use the same route in the

future. This could minimise considerable further disruption along the route of the cable corridor for future projects.

53. In respect of this stance, the County Council welcomes that the Sea Link proposals have been designed to coordinate with two further projects with regards to the landfall at Aldeburgh, the converter station site east of Saxmundham, and the cable corridor from landfall to the converter station via the proposed substation at Friston.
54. It is noted that feedback has been requested regarding the potential design approach for the proposed converter station site. It is important to consider that any potential design which is chosen would in effect set the design principle for further converter stations if further projects were to utilise this site. Furthermore, it is considered essential that NGET, as the first occupier of the site, demonstrates how three projects will be effectively accommodated.
55. Therefore, a preliminary masterplan will need to be developed for the site, in consultation with relevant statutory consultees, to accommodate up to three converter station sites.
56. The County Council also considers that the masterplan should be developed in consultation, through a working group, with the Town Council of Saxmundham the other relevant parish councils. Relevant parish councils are defined in Schedule 1 of the Infrastructure Planning (Applications and Prescribed Forms and Procedure) Regulations 2009.

LionLink emerging proposals and their coordination with Sea Link

57. While the Sea Link proposals allow for coordination, LionLink, in its recent supplementary non-statutory consultation, continue to consider a number of options where coordination with Sea Link would not be possible. This consultation put forward landfall options at Southwold and Walberswick, which would fail to coordinate with the Sea Link proposals regarding landfall and subsequent cable routing to the converter station site.
58. The County Council continues to expect the fullest possible coordination and co-location of the cable corridors and infrastructure between Sea Link and the emerging proposals for LionLink, in order to minimise the combined impacts of the two projects. Any proposals that reduce the level of coordination would require robust justification as to why greater coordination is not achievable, including a full assessment of increased levels of impacts across both projects.
59. Failure to coordinate with LionLink could lead to the County Council objecting to the LionLink proposals at the next stage of consultation, due to the lack of coordination with Sea Link.
60. The County Council responded to the LionLink consultation in November 2023.

Coordinated consenting approach

61. The principle of sub-sea interconnectors is an important aspect of an offshore centred approach. However, at this point, the outcomes of the Offshore Coordination Support Scheme (OCSS), and the review of connections in East Anglia, which is to be undertaken by National Grid Electricity System Operator, are unknown. Therefore, it is not possible to come to a reasonably informed preliminary conclusion about this project.
62. Given the spatial interdependencies of Sea Link and LionLink and the expectation in the National Policy Statement (NPS) for coordinated approaches, the County Council consider it essential for the National Grid Group to fully align the two projects both spatially and in the timing and development of their consenting, in order to minimise the impacts of their projects on the communities and environment of the area. Such an approach would also be in accordance with National Grid's own Responsible Business Charter. However, the recent Non-Statutory Consultation put forward landfall and cable route options which would not allow coordination with the Sea Link proposals.
63. The alignment of project development and consenting by the National Grid Group would potentially allow the Planning Inspectorate (PINs) to consider both projects simultaneously, using a single panel of examiners to achieve coordinated consenting. This approach would not only reduce the impact of the consenting process on communities and statutory consultees, but it would also allow for a more efficient and effective examination of the issues relating to coordination and cumulative impacts and could therefore significantly improve public confidence regarding the consenting and delivery of these projects.

Cumulative Impacts

64. Current timelines suggest that Sea Link will be under construction alongside several other NSIPs in the same area, including Sizewell C and LionLink.
65. Significant impacts are expected with regards to traffic on the routes leading to, and in proximity to the Suffolk Coast, local housing, services, and labour supply.
66. Although shift work for construction staff has been proposed to reduce traffic impacts, it is important that developers coordinate their shift patterns to avoid merely moving or extending busy periods in the morning and afternoon.
67. The accumulation of several NSIPs under construction at the same time is expected to impact tourism on the Suffolk Coast, and the County Council considers it essential that the promotor engages with local businesses and the host communities, to discuss potential impacts and community benefits.

Overview of SCC's Position on the specific proposals

68. The County Council considers the Sea Link project in Suffolk must fully coordinate consenting, construction, and operation, with the Lion Link project; and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.

69. The Council welcomes that the previous, and unacceptable options, which were put forward in the non-statutory consultation, have been discarded. However, the option now put forward, which the Council considered the least worst, does have significant challenges, including temporary and permanent access for construction and operation, the need for a masterplan for the converter station site, and the requirement to coordinate construction operations with other projects in the area, to minimise impacts on the surrounding transport network.
70. Management plans in outline must be provided at DCO stage, to be discharged in detail once main contractors are appointed following any consent. The Council considers that it would not be acceptable for final management plans to be secured only as part of the initial DCO submission.

The draft response to the promoter, contained in Appendix 1, provides further detail on these technical issues, including a summary of technical responses from the relevant departments within SCC. Sources of further information

- a) [Sea Link Non-Statutory Consultation - SCC Response](#)
- b) [LionLink Supplementary Non-Statutory Consultation - SCC Response.uk\)](#)
- c) [Sea Link Statutory Consultation Project Page](#)
- d) [Suffolk County Council Energy-and-climate-adaptive-infrastructure-policy \(suffolk.gov.uk\)](#)
- e) The EIA Screening can be found here: <https://pandp.suffolk.gov.uk/> by entering 'Sea Link' into the 'Document Title' search box.
- f) Sea Link Strategic Options Report - October 2023
<https://www.nationalgrid.com/electricity-transmission/document/150961/download>
- g) East Anglia Transmission Network Reinforcements - Hiorns Smart Energy Networks - September 2023
<https://www.suffolk.gov.uk/asset-library/n2t-joint-councils-non-technical-summary-of-the-hiorns-report.pdf>
<https://www.suffolk.gov.uk/asset-library/n2t-the-hiorns-report.pdf>

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