

Our Ref: NGV Nautilus MPI
Date: 25 October 2021
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BY EMAIL

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Dear Sir/Madam,

National Grid Ventures - Nautilus Interconnector Public Consultation – 14th September to 26th October 2021

Thank you for consulting Suffolk County Council in respect of the above.

Multi-Purpose Interconnectors

The County Council recognises the Climate Change Emergency and generally **supports** the provision of renewable energy infrastructure including in principle the use of Multi-Purpose Interconnectors and other shared/combined infrastructure where suitable.

Proposed use of the National Grid Electricity Transmission (NGET) Substation at Friston

It is noted that the proposals are predicated upon an achievable connection to the proposed National Grid Substation at Friston. As you know the Scottish Power Renewables (SPR) East Anglia One North and East Anglia Two offshore wind farm proposals are currently being considered by the Secretary of State. You will also be aware that Suffolk County Council objected to the siting of the National Grid and Scottish Power Renewables substations at Friston and therefore it can come as no surprise that Suffolk County Council **objects** to your proposals to connect at Friston, which would entail an expansion of the substations site. It is considered that such a proposal can only exacerbate the already unacceptable impacts upon Friston and the surrounding environment which also provides the setting of the village.

As you will be aware, the Secretary of State is due to make a decision on the above offshore wind farm proposals by 6 January 2022. Even if either or both of the proposals are consented, Suffolk County Council would not be minded to support additional energy infrastructure development in this sensitive location. Consequently, Suffolk County Council considers that NGV needs to revisit entirely its approach for connection to the National Grid, and consequently should not have constrained its current proposals only to considering options for converter stations within 5 km of Friston. With a wider area of search, there would also be a wider range of potential locations for landfall and cable routing choices. The comments that follow are therefore subject to this over-arching objection to the scope of the consultation.

Potential Landfall Sites

The potential landfall sites are highly constrained and in the absence of detailed proposals and mitigation the County Council does not wish to support any of them.

Landfall options A – D (between Sizewell & Thorpeness)

These landfall sites are located within the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty and could impact upon the Sandlings Special Protection Area, the

Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) and the Suffolk Shingle Beaches County Wildlife Site (CWS).

Landfall E (between Thorpeness & Aldeburgh)

This landfall site is located within the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is close to the Sandlings Special Protection Area and the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential. In terms of tourism, it is also located within a tourism hotspot. The site would also require access along the B1122 via Aldeburgh.

Potential HVDC Cable Routes

The proposed cable routes are also highly constrained and in the absence of detailed proposals and mitigation the County Council does not wish to support any of them. The County Council notes that from Landfall options A – D there is shared routing for the initial sections of the Cable Route Corridors.

Shared North & South HVDC Route

This route crosses the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty, the Sandlings Special Protection Area, the Leiston-Aldeburgh Site of Special Scientific Interest and the proposed SPR EA1N & EA2 cable routes. There are also multiple public rights of way which would require diversion.

Northern HVDC Route

This route crosses the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty, the Sandlings Special Protection Area, the site of the proposed Sizewell C Nuclear Power Station and other areas of high nature conservation value including the Sizewell Marshes SSSI and Aldhurst Farm which EdF have developed as a compensation site for some of the impacts on the SSSI. There are areas of high archaeological potential at Broom Covert, the section north of Leiston and around an area of a Roman Villa. There are also multiple public rights of way which would require diversion.

Southern HVDC Route

This route follows a similar route to that of SPR EA1N & EA2 cable route and there are ecological constraints where the route crosses the Hundred River and the area of woodland at Aldringham Court. There also needs to be an early assessment of the busy geophysics for EA1N/2, river-crossing, Friston Hall, and at Sternfield which might be a possible burial enclosure. There are also multiple public rights of way which would require diversion.

Central HVDC Route

The landscape of this route includes areas covered by a mosaic of small fields which have high landscape and ecological value. Development of this route would inevitably result in the disturbance to or severance of many field boundaries and with it their intrinsic value. There are also ecological constraints where the route crosses the Hundred River and the area of woodland at Aldringham Court. Archaeological assessment of Roman villa, Aldringham Green and the Hundred River crossing and valley are required.

Landfall E Route

This route is located within the Heritage Coast, Suffolk Coast & Heaths Area of Outstanding Natural Beauty and is close to the Sandlings Special Protection Area. Landfall E is also located within an Important Bird Area (IBA), RSPB Reserve and Site of Special Scientific Interest (SSSI) and County Wildlife Site. The site also has high archaeological potential in the form of a medieval church and Roman cemetery. In terms of tourism, it is also located within a tourism hotspot.

Potential Converter Station Sites

All of these sites are constrained to a greater or lesser extent.

Potential Converter Station Site 1 (Friston/Sternfield/Snape)

This site is highly constrained as it is situated in gently rolling countryside within the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and Snape Church which is a Grade II* listed building. There is also evidence of high archaeological value within the site. The Sandlings long distance footpath crosses the site and it is a gateway site to the wider Suffolk Coast & Heaths Area of Outstanding Natural Beauty.

The area falls within the Estate Sandlands landscape type. The area retains a series of characteristic features, including field patterns (simplified in comparison with Ordnance Survey first edition) and Lanes and footpaths, notably Kiln Lane, Redbarn Lane and Sloe Lane. Redbarn Lane and Kiln Lane are also historic parish boundary features. Any development here would need to be capable of being accommodated within the existing pattern of the landscape. Furthermore, in this area extensive new mitigation planting has the potential to have an adverse impact on landscape character

Potential Converter Station Site 2 (Saxmundham/Sternfield)

There are a number of listed buildings within the vicinity of this site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting. Saxmundham Footpaths 5 and 6 cross the site and would potentially require diversion.

The land to the north and East of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part therefore the current landscape is generally open and a converter station would be prominent from the B1119.

Potential Converter Station Site 3 (Theberton)

The potential HVDC cable routes to this site are highly constrained and there is no obvious highways access.

The westernmost part of the search area appears to be outside the boundary of the former airfield and therefore retains some limited historic hedge lines. As a result, any development would need to be accommodated within the existing field pattern. It should also be noted that despite the total loss of historic landscape features on the former airfield itself, there are some constraining features, including plantation woodland.

Potential Converter Station Site 4 (West of Knodishall)

This site is highly constrained and the development of it would potentially have a detrimental impact upon the setting of listed buildings in Knodishall including the Parish Church which is listed as Grade II*. In terms of archaeology there is a Roman Villa within the boundary which requires early assessment. The landscape includes attractive woodland and belts of trees some of which would potentially be lost. Knodishall Footpaths 14 and 16 cross the site and would potentially require diversion.

This area retains a simplified pattern of historic field boundaries with later plantations and secondary woodlands, it is part of the Ancient Estate Claylands landscape type. Any development in this area would need to be capable of being accommodated within the existing pattern of enclosures and woodlands. Furthermore, the proximity of Knodishall village would be likely to give rise to adverse impacts that it may not be possible to avoid or appropriately mitigate. Finally, in this landscape extensive new planting has the potential to have an adverse impact on landscape character.

Potential Converter Station Site 5 (Knodishall/Leiston)

This site is highly constrained and the development of it would potentially have a detrimental impact upon the setting of listed buildings in Knodishall including the Parish Church which is listed Grade II*. The landscape of this site is formed by a mosaic of small fields which a high landscape and ecological value. Development of site would inevitably result in the loss of many field boundaries and with it their intrinsic value. Knodishall Footpaths 2 and 15 cross the site and would potentially require diversion.

This area retains much of its historic field boundary pattern, particularly in the northern half, and also has a scattering of ponds, plantations and secondary woodlands and is part of the Ancient Estate Claylands landscape type. Any development in this area would need to be capable of being accommodated within the existing pattern of enclosures and woodlands. Furthermore, the proximity of Knodishall village and Leiston would be likely to give rise to adverse impacts that it may not be possible to avoid or appropriately mitigate. Finally, in this landscape extensive new planting has the potential to have an adverse impact on landscape character.

Cable Corridors for Grid Connection

These need to be considered within the context of the County Council's objection to the use of the proposed NGET Friston substation.

Cable Corridors NE of proposed NGET substation & SW of proposed NGET substation

These connections will exacerbate the potential impacts upon Friston and the surrounding area from the proposed NGET and SPR substations.

Questionnaire

I note the following questions that were attached to your 'Have Your Say' questionnaire.

17. Do you have any further comments on the approach taken to identify our converter station search areas or cable corridors, based on the assumption of a connection to the NGET substation proposed at Friston? Please include any local knowledge or evidence you think would be helpful here.

For the reasons stated above the County Council does not consider that the consultation should be proceeding on an assumption of a connection to the NGET substation proposed at Friston. The County Council considers that this assumption has unduly constrained the choice of potential locations for all elements of the proposals and NGV is invited to reconsider its entire approach to connecting the Nautilus Interconnector to the National Grid.

18. Do you agree that it would be beneficial to co-locate developments to form clusters within the AONB, to help minimise potential effects on the community and the natural environment?

The County Council does not believe this would be appropriate given the need to have regard for the Purposes of Designation of the AONB and the view of Natural England on that matter in respect of Sizewell C. Furthermore, because alternatives exist, outside the AONB to such an approach. In fact National Grid PLC have identified three projects for this area, and therefore there may be an opportunity to co-locate these projects to minimise harm to communities and the environment. The Council considers that opportunities for such colocation, coordination and where appropriate, sharing of connection infrastructure, should be fully exploited. This would help to minimise potential adverse effects on communities and the environment, and focus mitigation measures and the Biodiversity and Environmental Net Gain, required by the draft NPS and the emerging Environment Bill (Act) in schedule 15
<https://bills.parliament.uk/publications/42717/documents/683>

19. Do you think that consideration should be given to locating developments in areas of the AONB which are already characterised by industrial development?

The Council does not believe this would be appropriate given the need to have regard for the Purposes of Designation of the AONB and the view of Natural England on that matter in respect of Sizewell C. Furthermore, because alternatives exist, outside the AONB to such an approach.

If I can be of any further assistance with this matter, please do not hesitate to contact me.

Yours sincerely,

Graham Gunby

Graham Gunby
Development Manager
Growth, Highways & Infrastructure