

THE ALDE & ORE ASSOCIATION

Your Voice - Your Estuary



Application to register for the DCO for Sea Link from the Alde & Ore Association (Registered Charity number 1154583)

The Alde & Ore Association exists to protect for the public benefit the Alde, Ore and Butley rivers and their banks from Shingle Street to their tidal limits together with features of public interest. It has some 2000 members.

The Association is concerned that the Sea Link project will have a damaging effect on this part of the Suffolk coastline because the project goes through and in places skirts around the Suffolk and Essex Coast & Heaths National Landscape and impinges on the Suffolk Heritage Coast. The Alde and Ore Estuary lies within that National Landscape and is part of the Heritage Coast.

A very important feature of the Alde and Ore Estuary is that it is almost entirely subject to statutory environmental designations for protection, particularly in relation to breeding, wintering, waterbird and sea bird assemblages: these are Special Protection Area, Ramsar Site, Special Area of Conservation, and Site of Special Scientific Interest. Further, the coastal area now lies on the recently selected candidate for World Heritage Status of the East Coast Flyway stretching from Humberside to the Thames. This wildlife is always very sensitive to light and noise pollution and other forms of disturbance.

The potential impacts are:

- 1. Inappropriate visibility in a National Landscape:** The very tall convertor buildings will, according to the maps presenting the Zone of Theoretical Visibility, be visible from a number of points in the estuary. (Sea Link 2023- PEIR Vol 3 Part 2 Chapter 4 Figs Heritage & Landscape, author National Grid).

This is an area valued for its beauty, peace and tranquillity as well as its significant wildlife. The visibility of the buildings will present the hard face of urbanisation looming over an area with a topography of generally 10 metres or less in height, while the proposed convertor buildings will be inland where ground level is around 20 m OOD and will stand at 26 m high in three large blocks, so 56 metres in total: these will detract from the natural landscape and open skies. (See the word cloud from 2024 survey on why the Alde-Ore area is valued, at end of this document, or see www.aldeore.org/publications).

An additional concern is that this issue of visibility would appear not to have been fully addressed in the DCO application. The Landscape and Visual Study area of the Saxmundham and Friston sites is confined in the south to a zone skirting just north of the Alde and Ore Estuary. But the NG maps setting out the Zone of Theoretical Visibility clearly show that the tall convertor buildings will be seen in the estuary itself as will the substation buildings at Friston.

This suggests the study area should have covered the whole estuary. The estuary is an area sought after not only for its peace and tranquillity and leisure matching those characteristics but also for its wide open skies: it is mostly low lying except in a very few places and below 5m AOD, so that visibility over the whole area of blocks of tall buildings will be obvious and very hard to camouflage.

2. **Light pollution:** In theory the project plans suggest that little lighting will be needed. While warning lights for aircraft may be a few red lights, there are likely to be occasions where more extensive nighttime lighting will be needed during construction or maintenance periods. In a landscape with little light pollution and valued for its dark skies, such illumination will disturb the wildlife protected by numerous statutory environment protection designations (SAC, SPA, RAMSAR, SSSI as well as the nature reserves and being on the East Coast Flyway currently nominated as a World Heritage Site).
3. **The coastline is a dynamic and fragile one** with highly mobile sediment generally going southwards, made all the more at risk with rising sea level and greater storminess. The proposal for landfall for the Sea Link cables to enter from the seabed, less than two miles north of the shingle bank that protects the Alde and Ore Estuary, is of concern. The project plans a landfall by horizontal direct drilling from the seabed. However, the geological layer it will need to go through includes coralline crag, which is very friable. The concern is that anything interrupting the extremely variable natural processes could well have an effect further down the coast by disturbing the north south drift of sediment.

In addition, the shingle seabed is constantly shifting both ways up and down the coast as well as inshore and then out to sea: in this way huge amounts can be shifted overnight in a storm. In the bay to the north of Thorpeness the Concerto fibre optic telecommunications cable was uncovered in such a storm in October 2018 and exposed for several days simply by the action of tide and wind.

Anything that impedes the southerly movement of shingle down to Orfordness prejudices the long-term viability of the neck of the Ness, which has only 50m width from sea to river at Aldeburgh.

4. **Inadequate road capacity:** The local road network is of a small rural nature. The heavy continuous road transport associated with any National Infrastructure Project could overwhelm local traffic and lead to loss of the tourist trade enjoying the coastline and the Alde and Ore Estuary. All this would be detrimental to the economic well-being of the area and well-being of the local population.

This is a very rural area. The largest road near the proposed sites but still some distance from the possible sites is the A12, which is not even a trunk road: the local B roads can cope with light traffic able to pass by on either side of the road but many of the minor feeder roads are barely more than single track with occasional wider stretches or passing places. The road surface/foundation construction too is not built for heavy vehicles.

The road edges themselves are crude edges of tarmac and there are many cutdown dips in the adjacent banks which can damage vehicles which go onto the banks to allow other vehicles to pass going the other way. These cuts are to release the storm run-off that gets trapped on the roads, as any thunderstorm can result in long troughs of water across the road, which makes traffic slow dramatically or even have to turn round and go another way.

- 5. Impact on the economy of whole area affected by the project.** The essential wealth of the area is its natural capital consisting of open landscapes, unspoilt with small settlements, attractive tiny rural road networks, walking, and wildlife. The economy will be adversely affected both:

- a) in the short-term, as access to the area will be undermined by heavy construction traffic and
- b) in the longer term, by the looming constructions over the clear skies.

In Suffolk the main driver of the economy is the tourist industry because of the lovely unspoilt country and coast, with easy access for family traffic from towns and London so beneficial to many people needing fresh air and relaxation. This point has been made in every consultation by National Grid: it seems to simply remain unaware of all this. For example, if a small area like the Alde and Ore estuary, which is only a part of the area that will be affected by this project, lost even 10% of its tourist trade, driven away by clogged roads and dangerous driving (narrow roads and HGVs do not mix well), that could cost the area, based on a 2014 survey, £7-10 million a year of lost revenue (and so employment and income). The recent third ten-yearly survey by the Alde and Ore Association in 2024 shows the potential loss is now far more. The economic value of the area from tourism and leisure is £83 million, plus a further near £6 million from second homes and £19 million of agricultural value. (The AOA has conducted 3 economic surveys each 10 years apart, 2003/4, 2013/4 and 2024, all of which show just how important tourism is to the area – www.aldeandore.org/publications Alde-Ore Economic Studies).

- 6. Cumulative impact of several NISPs:** A further relevant consideration is the cumulative effect of this project being carried out in some cases simultaneously and others seriatim of the several large National Infrastructure Projects, mostly within a 5-mile radius of this part of the coast, namely:

- Sizewell C twin nuclear reactor, which has already stated preliminary work and, if given final permission, construction will last until around 2037,
- East Anglia One North and East Anglia Two, both accessing the area some three miles north of Aldeburgh for which preconstruction work is in progress and, once actual construction starts, could last some 5 years,
- Sea Link, which is the subject of this DCO,
- Lion Link which, if permitted, will also need access to the Friston/Saxmundham area.
- There will also be some minor work by Five Estuaries at Orford, by the Alde/Ore Estuary constructing protected areas for Lesser Blackbacked gulls in the next few years.

The cumulative impact will be serious both in the short and the long term: it will be substantial during construction of the several projects, whether through the heavier impact of more than one construction at any one time or, over the years where continued disturbance over a long period of time will change patterns of economic activity and presence of wildlife in habitats.

Below: response from 735 people to a survey conducted in the summer of 2024 as to what they value about the area.

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