

# National Grid Electricity Transmission Sea Link

## Additional Statutory Consultation – August 2024

### Saxmundham Town Council Response

#### **Preliminary Environmental Information Report**

Saxmundham Town Council refers to our response to the Statutory Consultation of December 2023 and confirms that our position on the proposed project has not altered:

‘Saxmundham Town Council strongly opposes the Sea Link project. The imposition of one, or more monolithic converter stations adjacent to Wood Farm in Saxmundham is nothing more than industrialisation and decimation of our rural countryside and way of life’.

‘Whilst NGET has undertaken the prescribed statutory pre-application consultations, the views of Saxmundham’s townspeople and the credible alternative of brownfield infrastructure sites, are seemingly dismissed’.

Whilst we understand that NGET has removed reference to co-location with Nautilus and Lion Link and accordingly reduced the draft order limits of Sea Link, space in ‘the surrounding area for delivery and potential co-location of key infrastructure’ is recorded in the PEIR (Preliminary Environment Information Report).

The lack of coordination increases work for all levels of local democracy. Instead of synchronisation, each project is subject to a separate Development Consent Order (DCO) and this unduly burdens local councils, and concerned residents and other stakeholders, with hours of additional work. Despite many requests and the government’s EN-1 Overarching National Policy Statement for Energy<sup>1</sup>, it is apparent that companies under the umbrella of National Grid cannot or will not work together. Such lack of direction proposed between NGET and National Grid Ventures (NGV) is disappointing.

Moreover, in the process of reducing the draft order limits to omit Lion Link and Nautilus projects, NGET has effectively removed the need to account for cumulative effects of all three proposed converter and infrastructure projects. Accordingly, Saxmundham Town Council reiterates our demand in our Sea Link Statutory Consultation response, for:

‘An immediate moratorium and a speedy government enquiry on all electricity transmission network development. This is vital to determine a strategic and holistic way forward which meets the UK’s net zero targets but is considerate to those affected by the necessary onshore infrastructure’

We are disappointed that whilst NGET has request feedback for limited aspects in the July 2024 Additional Statutory Consultation, no mention is made to the proposed final design of the converter

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<sup>1</sup> [Overarching National Policy Statement for energy \(EN-1\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/overarching-national-policy-statement-for-energy)

station building. We exhort NGET that if the project proceeds an innovative design should be submitted that mitigates and camouflages the appearance of the 26-metre converter station and is sympathetic to the rural parkland landscape. If the suggested design submissions proceed, the buildings would detrimentally impact three important views as published in the Saxmundham Neighbourhood Plan.

Notwithstanding our comments above and our original responses to the Statutory Consultation of December 2023, we address the proposed changes as recorded in NGET's document *The Great Grid Update, Sea Link, Additional Preliminary Environment Information, Version A, July 2024*, as follows.

### **Environmental Topics with Similar Effects to the Original PEIR – Suffolk Offshore Scheme**

#### **Water Environment**

NGET claim that by selecting the access route from the A12, via the B1122 Benhall to Saxmundham Road, that there will be a neutral effect on the water environment. Moreover, they argue that their changes are beneficial for the water environment, by placing the access 'slightly further north' at a crossing that is narrower resulting in less interaction with the floodplain. Finally, that to compensate, additional Biodiversity Net Gain (BNG) land either side of the bridge has been added to the draft order limits to allow for watercourse improvements.

Saxmundham Town Council's concern for the watercourse is principally directed at the water run-off from the actual converter site that has the potential to result in flooding and water course pollution issues. This will be aggravated by the introduction of a bridge crossing in this location that is dramatically increased in dimensions from 3.4 metres from 2.6 to 6 metres in height. To achieve this considerable earthwork of 80 metres to each side of the River Fromus will be required. We consider that this work has the potential to create surface water flooding due to construction plant and vehicles compacting and trenching the surrounding land. Importantly there is potential for increased river pollution due to run off from former agricultural land and introduction of pollutants from construction plant and vehicles.

In light of this, we consider the works will not have a neutral effect on the water environment. We exhort NGET to ensure measures to consider climate change adaption and resilience are adopted in accordance with government's EN-5 National Policy Statement for Electricity Networks Infrastructure.<sup>2</sup>

Mitigation must include a full watercourse survey with measures to prevent construction and operational stage water run-off from entering the watercourse. Saxmundham Town Council considers that the introduction of Biodiversity Net Gain (BNG) in this location only partly addresses the issue of BNG as the land in some areas is already removed from agriculture.

Saxmundham Town Council also exhorts NGET to demonstrate corporate social responsibility by aiming higher than achieving a 'neutral' effect on the water environment by introducing compensatory measures to improve the River Fromus habitat and wildlife areas. Whilst not exhaustive we suggest a Boardwalk in Saxmundham that provides access to the river and allows for floodplain mitigations plus improvements to Carlton Wood. This area located to the north-west of

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<sup>2</sup> [Electricity Networks National Policy Statement - EN-5 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/118111/en-5-national-policy-statement-for-electricity-networks-infrastructure.pdf)

Saxmundham would in small part compensate for the decimation of trees proposed by NGET in the construction of the site access road. In addition, Saxmundham Town Council exhorts NGET to finance a Tree Fund to protect and monitor new planting and a River Fund to enable ongoing monitoring and improvements.

### **Traffic and Transport**

NGET note that any additional vehicle traffic to the southern access on the B1121 Main Road to Saxmundham will be restricted to construction movements associated with the landscaping strategy. This has yet to be quantified by NGET. Moreover, NGET do not take into account the increased size of the proposed river bridge. The increase requires significant earthworks to achieve the 6 metre clearance. Thus, there will likely be considerably more earth moving lorries than if the bridge remained at 2.6 metres as previously calculated.

Mitigation must include a full traffic survey and consideration in association with Suffolk Highways to potential improvements at the A12/B1121 junction at Benhall to accommodate the likely increase in HGV movements during the construction phase. Furthermore with the proposed Sizewell C Co A12 road improvements at the A1094 junction, road delays are likely for vehicles travelling north towards the A12/B1121 junction, and with the proposed road improvements to the A12 adjacent to the Saxmundham Garden Neighbourhood, road delays are likely for vehicles travelling south towards the A12/B1121 junction. This has potential for both worker and HGV traffic to ignore agreed construction routes, leading to increased traffic from the A12/B1121 Kelsale via Saxmundham and B1119 Saxmundham to B1121.

Saxmundham Town Council exhorts NGET to commit to introducing necessary traffic calming measures to prevent this including improvements to the town centre road network.

### **Socio-economics, Recreation and Tourism**

Saxmundham Town Council is concerned that additional impacts in relation to the selection of the B1121 access between Benhall and Saxmundham have not been addressed. We consider this route will likely create a worse impact on, and potentially deter, local residents and visitors travelling from the nearby tourist hot-spots of Aldeburgh and Snape to visit Saxmundham's shops and visitor attractions. Whereas customers from the north have two routes to access Saxmundham from the A12, those travelling from Aldeburgh and Snape have little alternative than to travel via the proposed site access, or take a far longer route. This has the potential to be detrimental to businesses in Saxmundham, especially during holiday times.

Saxmundham Town Council exhorts NGET to consider necessary mitigation measures such as utilising Sizewell C Co.'s worker park and ride facilities located at Darsham and Wickham Market and their freight management facility (likely to be located on the Orwell Logistics Park) to both reduce and control traffic movements. Failure to do so will result in undue cumulative traffic effects in and around Saxmundham.

### **Health and Wellbeing**

Whilst we agree that the removal of the northern access route is beneficial to residents living to the East of Saxmundham, we believe it will be detrimental to Saxmundham residents living close to the

western access road as well as Benhall and Sternfield residents, due to increased traffic noise and emissions.

Mitigations could include the introduction of low noise road surfaces, speed limit restrictions and the offer of triple glazing for affected properties.

### **Suffolk Onshore Scheme Inter-Project Cumulative Effects**

Saxmundham Town Council understands that by not considering co-location of Nautilus and Lion Link in the PEIR that Sea Link will not be subject to cumulative effects with proposed projects. Obviously, this assumes that planning consent, if granted, is gained prior to NGV Lion Link and Nautilus projects.

We advise that the major issue in this area is the Sizewell C project and NGET Sea Link should seek, as mentioned in our response to the Statutory Consultation, to utilise Sizewell C Co's offsite park and ride facilities for their workers and their freight management facility (likely to be located on the Orwell Logistics Park) to both reduce and control traffic movements. Failure to do so will result in undue cumulative traffic effects in and around Saxmundham.

### **Additional Assessment**

#### **Summary of Key Changes for Landscape and Visual**

Saxmundham Town Council strongly objects to the access across land between Bigsby's Corner and Saxmundham on the following grounds:

In the original PEIR document, the access routes and bridges were recorded as being temporary haul routes. We are dismayed that NGET intend to maintain the road and bridge as permanent structures. Moreover, the height of the parapet could be, depending on discussions with the Environment Agency, up to 6 metres above ground level with approach ramps of up to 80 metres.

NGET confirm that the bridge will be visible both from PRow and road traffic on the B1121 between Saxmundham and Benhall. Additionally, NGET acknowledge that their proposed plans adversely impact three important views as published in the Saxmundham Neighbourhood Plan: views to Hurts Hall (Grade II) and St John's Church (Grade II\*) within an open farmland setting backed by wooded rising land from the B1121 (View 1a), St John's Church (View 1b) and View from the high point of The Layers looking across the River to Hurts Hall (View 2).<sup>3</sup>

Saxmundham Town Council considers the decimation of the parkland aspect of Hurts Hall and rural outlook to be untenable. Considering that up to three proposed converter stations would be plainly visible on the horizon to the right of Hurts Hall, we object to further decimation and industrialisation of the Landscape Character as proposed by the access road and bridge.

### **Likely Significant Effects During Construction**

NGET agree that the bridge construction will increase the scale of change in relation to Hurts Hall and St Johns Church – plus the bridge will be closer to Hurts Hall and it *'would be in closer proximity*

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<sup>3</sup> Saxmundham Neighbourhood Plan, Para. 11.31.

*to the receptor than the construction activity associated with the converter station site and potentially viewed in combination with it'. In this we assume that NGET mean that Hurts Hall and the surrounding land will further be subjected to the effects of construction. In other words, intra-project cumulative effects.*

Furthermore, NGET agree that removal of vegetation for the larger bridge, including plantation and mature woodland, would further open views towards the converter station and increase the focus towards this activity. The introduction of intra-project cumulative effects in an area identified in Saxmundham's Neighbourhood Plan as views that should be protected and also in the Suffolk Coastal Landscape Character Assessment of the Fromus Valley is untenable.<sup>4</sup>

We do, however, agree with NGET, that this will be a Significant Adverse Effect that will adversely affect the Landscape Character and the setting of Hurts Hall.

### **Likely Significant Effects During Operation and Maintenance**

NGET correctly identify that the bridge would be an 'incongruent' feature within the landscape even after planting mitigations are established. The removal of vegetation would permanently alter the vegetation network along the Fromus valley which is part of the heritage of the Landscape Character Assessment.

NGET correctly identify that this will be a significantly adverse effect. Saxmundham Town Council contends that the road and bridge should not be a permanent feature and that after construction, they are both removed, the landscape is reinstated, and further research undertaken to identify an alternative operational access. Moreover, should planning consent be granted, considering the damage likely to be inflicted in this area, the complications of intra-project cumulative effects and the fact that the views identified in Saxmundham Neighbourhood Plan would be blighted by converter station(s), we suggest NGET establish an entirely new alternative access route.

If an alternative route cannot be identified, Saxmundham Town Council exhorts NGET to ensure that the adverse impact to the protected views, heritage and landscape is mitigated and compensated by designing the bridge architecture to ensure it is appealing and sympathetic to the visual amenity of Hurts Hall and the surrounding parkland.

### **Summary of Key Changes for Ecology and Biodiversity**

#### **Likely Significant Effects During Construction**

NGET acknowledge that the larger bridge will 'take more land from terrestrial ecological features', but argue that the Fromus BNG land, stretching from roughly Benhall Bridge to the outskirts of Saxmundham would have a positive effect on ecology. Saxmundham Town Council is very concerned about the ecological damage both to the river and the wildlife created not only by the bridge, but from the construction works to create up 80 metre ramps either side of the structure and importantly the access road.

Saxmundham Town Council understands that the access road cuts through established woodland that contains oak trees, beech trees and of great significance, a Horse Chestnut tree, identified by

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<sup>4</sup> Saxmundham Neighbourhood Plan, Para 11.31; Suffolk Coastal Landscape Character Assessment, pp. 23-25

East Suffolk Council's Arboriculture Manager as having 'exceptional qualities' and that he will aim to get it registered with the National Tree Register of Great Britain. We would request NGET to commission a BS5837:2012 *Trees in Relation to Design Demolition and Construction Tree* survey and arboricultural implications assessment, so that any impacts can be fully assessed before the proposal can be considered further.

We contend that the damage created by the proposed access route in this area of woodland could not be mitigated. Moreover, as not all areas are in agriculture, the extent of improvement from the BNG land is limited.

We suggest that NGET works with Saxmundham Town Council to identify additional other areas within the parish to fully offset the damage to the river environment and should this proposal succeed, mitigation and compensatory suggestions to improve and reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.

## **Cultural Heritage**

### **Summary of Key Changes for Cultural Heritage**

NGET accept that the amendment to the crossing of the River Fromus and increased height 'has the potential' to impact further on Hurts Hall. Saxmundham Town Council contends that the bridge construction in conjunction with the converter station construction will create intra-project cumulative effects and severely impact Hurts Hall and adjacent properties.

Our comments regarding the bridge and access road being temporary structures, and an entirely new alternative access route, as noted above are pertinent in relation to Cultural Heritage.

### **Likely Significant Effects during Operation and Maintenance**

NGET commented that effects of the road and bridge 'should be limited as a result of existing retained tree cover as well as the distance between the proposed bridge and Hurts Hall'. They contend it will not be a significant adverse effect, but this will be reviewed and kept under review and assessed within the ES as more design details emerge.

Saxmundham Town Council strongly disagrees with this. Disturbingly this statement contradicts NGET's comments in 'Likely Significant Effects During Operation and Maintenance' when they identified that the bridge would be an 'incongruent' feature within the landscape even after planting mitigations are established.

Moreover, NGET know that the bridge and 80 metre run up will be extremely detrimental and during a webinar with NGET and Saxmundham Town Council, representatives from the Sea Link project confirmed to Saxmundham Town Council that extensive landscaping would be undertaken with an architecturally designed bridge and an avenue of trees to reflect a stately home aspect.

### **Onshore Scheme Extended Working Hours**

Saxmundham Town Council strongly objects to NGET's proposal to extend working hours to include Sunday working from 07.00 – 17.00.

NGET identified that there could be significant adverse effects in relation to traffic and transport with a potential to result in severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay and road safety if unmitigated and without restrictions. Whilst Saxmundham Town Council was informed during a webinar with NGET that no Sunday deliveries would be undertaken, this is not specified in the additional PEIR proposals.

Saxmundham Town Council also objects to any Sunday work on the following grounds. Noise of plant moving goods within the compound including warning beepers have potential to disrupt nearby church services. Moreover, noise, vibration and dust, aggravated by winds from either the east or south will affect close-by residential housing. Also, the construction of steel portal frame buildings creates excessive peak noise during installation especially from impact drivers.

Therefore, should the proposals proceed, Sunday working should be limited to very occasional exceptions, and this could include the delivery of abnormal indivisible loads and concrete pouring. We exhort NGET to ensure that the proposals for Sunday working are fully specified in its DCO application.

NGET specified that Sunday working in relation to socio-economics, recreation, tourism and health and wellbeing had the potential to result 'in significant adverse effects to PRoW'. No mention was made to the health and wellbeing of residents. Saxmundham Town contends that inter-project cumulative effects, including the build of Sizewell C and the Garden Neighbourhood, will result in increased traffic and noise that will adversely affect the wellbeing of the town's residents in relation to stress and anxiety. Therefore, it is vital that there is one relatively peaceful day during the week to give residents some respite.

Importantly, Saxmundham Town Council wishes to register an official complaint in respect to NGET's consultation in connection with Sunday working hours. NGET's July 2024 Community Newsletter, that was supposedly distributed to 36,000 households, only advised residents of 'changes to planned working hours'. Saxmundham Town Council contends that by not clearly informing residents of Sunday working, NGET is culpable of obfuscation.

### **Water Framework Directive Screening Assessment**

NGET contend there is limited potential for project activities to cause future deterioration of WFD waterbodies. Saxmundham Town Council considers this omits the 80 metre earthworks to the planned Fromus Bridge that has the potential to create run-off during construction from former agricultural land into the water course.

### **Conclusion**

In conclusion, in response to NGET's Sea Link Additional PEIR, Saxmundham Town Council objects to the following:

- the bridge and access road located between Bigsby's Corner, Benhall and Hurts Hall due to the destruction of woodland, including an 'exceptional quality' chestnut tree and the decimation of local views as identified in the Local Plan.
- Sunday working as it will be detrimental to the health and wellbeing of residents.

Whilst mitigations are suggested, it is not possible to offset the loss of significant trees, views and residents' wellbeing.