

National Grid Electricity Transmission – Sea Link Statutory Consultation

Saxmundham Town Council Response

Summary

Saxmundham Town Council is opposed to the development of Sealink as presented by National Grid Electricity Transmission (NGET) in this statutory consultation.

Saxmundham is a historic market town and parish, whose current population is 5,000, having grown significantly in recent decades. Unlike our close neighbour Leiston, with its proud engineering heritage, Saxmundham is a service centre for the surrounding rural district and has never had a significant industrial base nor character.

If the current Sealink proposals proceed, the whole character and landscape of our town will change forever. We risk facing a giant set of industrial structures that will overshadow and dominate our town. But whereas in previous industrial revolutions, new industry has brought jobs and prosperity to the towns affected, we know that this will not be the case here. We will have all the impacts of random, unplanned industrialisation but without any of the economic benefits accruing to us. Our town faces a fundamental, externally imposed overturning of its character and heritage.

We understand the need to reinforce the country's electricity transmission network, but National Grid has not clearly demonstrated that the industrialisation of the rural countryside is necessary to achieve this. If it is shown, objectively, and after proper analysis of all alternative options, that locating Sealink in East Suffolk is in the national interest, then Saxmundham will surely play its part. Until this has been evidenced, then it is our duty to test and vigorously oppose the proposals as currently put forward. And, at the very least, to ensure that compensation and mitigation are commensurate with the scale of disruption and damage, both in the short and long term.

The Sealink project is stated to be more about improving security and resilience in our national electricity transmission network than about 'decarbonising' the energy system to meet the UK's net zero targets. We are aware of the diversity of views as to whether this project, requiring such major disturbance in an extremely ecologically fragile as well as beautiful environment is necessary, and whether the location here (and not in a brownfield site) of onshore infrastructure is the optimal and necessary outcome in the national interest. The argument has been put forcefully by others that offshore solutions, plus landfall to brownfield sites are possible which would avoid the worst of the disadvantages for Suffolk.

What is needed, on the issue of the merits of the proposal, is a rapid independent enquiry, established by the government, to assess the validity or otherwise of the alternatives and 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. If that does not occur, the already-prevalent sense of alienation, of having a serious disruption imposed by non-public enterprises in a non-transparent manner, will be many times magnified.

Cumulative Impacts

National Grid and its associated companies are not the only players looking to develop Nationally Significant Infrastructure Projects in this area, so our concern is that even three converter stations may turn out to be an underestimate of what will occur in the near future.

Saxmundham is also identified in East Suffolk Council's Local Plan as a growth node, with proposals for a 'Garden Neighbourhood' of 800 new dwellings, to be located between the railway line and A12. This development is due to be rolled out over the coming decade, including a new roundabout to connect to a service station, lorry park and a new employment zone to be created on the west of the A12.

We have argued, in the Local Plan process, that future growth of the town should be mainly located to the east since the proposed 'Garden Neighbourhood' development is badly connected to the town. If the converter stations are indeed located as planned, this will block the only sensible, viable location for future expansion, since siting future housing adjacent to several giant converter stations is simply not acceptable.

On top of all these other development challenges, in the south and west of the town, we confront Sealink's vast scale industrialisation to the east, with access roads to be constructed to the north or south. Saxmundham will be a town under siege.

Economic Aspects

The economy of Saxmundham is based on services which serve a wide catchment area. It is not itself a tourist town but serves many of the needs of the crucial tourist sector. We consider that the industrialisation of Saxmundham's landscape, with constant roadworks and construction traffic, and the environmental and ecological impacts will lead to a grave loss of confidence by tourists themselves and businesses based on the 'visitor economy'. This will feed into Saxmundham's own local economy in a negative way.

In short, from an economic perspective, the local economy of the area, and that of our town, is almost certain to take a hit in the short and longer term. And as noted already, the new industrialisation of our town will be a largely jobless one so local people will not benefit in any way from the wages that have normally accrued from new jobs in new local industries.

Environmental Impacts

Other respondents will have drawn attention to the dangers to our much-loved local environment and ecology in the Suffolk coastal area from the multiple energy projects. We agree and underline that government needs to take on its responsibility to assess the overall impact of these projects on our area, weighing the perceived advantages and disadvantages in a transparent and unbiased way.

The proposal to locate not just one converter station, but three, immediately adjacent to the eastern edge of the settlement boundary, will have profound and negative impacts on our town and its residents, whose choices to live here are, for many, based on the historic character of the town and its surrounds. The industrialisation of eastern Saxmundham will have a particularly negative impact on local people. Converter stations are huge in footprint and height, hard to screen, invasive visually, noisy and cause light pollution. The intention is to locate them within a very short distance of an existing residential area. Visually, NGET's own consultants show that they will also intrude into our protected landscape views from the south of town.

If Sealink Is Consented - Mitigation and Compensation

For all the above reasons, we consider that the selection of eastern Saxmundham and Sternfield for the location of multiple converter stations is wrong, and certainly premature ahead of any overall assessment, organised by government, of the case for Sealink and related projects and the locational issues concerned if one takes a holistic, transparent approach to the issue of infrastructure to meet the needs of the Great Grid Upgrade. Sealink should not proceed until this assessment has been undertaken.

If after consideration, eastern Saxmundham is decided upon as an appropriate location, we must insist that only one, and certainly no more than two, converter stations should be located in the vicinity.

Moreover, it is self-evident that our town and parish will suffer from the near-jobless industrialization process which brings no local benefits. It is therefore of paramount importance that both central government as well as the developer agree on an appropriate compensation and mitigation package – both physical (improved local infrastructure), social (improved public and community services) and financial (reduced energy bills for the lifetime of the projected lifespan of the converter stations), as compensation for local loss of amenity and disruption. This package needs to be agreed with the different local authorities concerned – county, district but also town council as the very local voice of Saxmundham.

In our detailed evidence below, we give many ideas for the types of mitigation that we need to achieve. But we also call on central government to play its role in planning holistically for the energy transition. Without proper leadership, transparency and equity at all levels, failure will follow.

About Saxmundham¹

The parish of Saxmundham is roughly equidistant from Ipswich and Lowestoft, the two principal economic centres of East Suffolk district. It is served both by the A12 and the East Suffolk line of Greater Anglia railways. It acts as a 'gateway' to the Suffolk Heritage Coast, the tourist resorts of Aldeburgh and Thorpeness, and the international music venue at Snape Maltings.

The town originally grew up to the west of the River Fromus and developed in a linear form along the turnpike, which was the main road from London to Lowestoft. The town was granted a market charter in 1272, signifying its importance as a market town serving the surrounding agricultural and rural area, a function which it still fulfils.

Saxmundham Conservation Area covers the historic heart of the town and includes most of the land between the River Fromus and the railway and extends north of the railway bridge. The buildings in the centre of town are mainly 16th, 17th and 18th century.

With the coming of the railway, the town expanded westwards largely in the form of typical Victorian brick-built terraces. The construction of the by-pass in the 1980s led to large scale residential development between the existing town and the by-pass. More recent development has extended the town eastwards. The population of Saxmundham in 2020 was estimated by the Office of National Statistics at 4,723.

The town sits in the Fromus valley below the rising land to the east. The approach from the south is spacious, it is flanked by The Layers to the west and Hurts Hall Park to the east with views across to Hurts Hall itself and St John's Church, both of which are listed grade II. Saxmundham boasts 50 listed buildings, most of which are in the town centre. The approach from the north is wooded and enclosed and opens out on arrival at the built-up area. Approaching from the east, the town is not visible until the boundary when the road dips down towards the Fromus, and there are glimpses of the roofs of the town ahead.

There are no designated nature conservation sites within Saxmundham, however the parish is relatively close to the extremely sensitive Sandlings, Alde-Ore and Minsmere-Walberswick Special Protection Areas and the Suffolk and Essex Coast and Heaths National Landscape.

Saxmundham is situated in an area which has several road links to areas of open countryside and the coast. However, it only has a few open green spaces in the town centre and several smaller green spaces that create an open setting within the more recently developed housing estates.

Saxmundham has also recently adopted a Neighbourhood plan, which acknowledges the potential for modest and sustainable growth of the Town for housing and business whilst protecting the 'green gateways' to the Town.

East Suffolk Energy Projects – General Observations²

We understand the national need to expand renewable and sustainable green energy sources, and the desire to improve the interconnections between the UK and Europe, however, we are concerned that the determination of connection points and the coordination of onshore infrastructure is not

¹ Information sourced from Saxmundham Neighbourhood Plan – Adopted July 2023

² Information sourced from Theberton and Eastbridge Parish Council's response to the Sealink and Lion Link non-statutory consultations

being determined strategically and holistically by the government especially when so large a proportion of our electricity requirements, whether through offshore wind generation or importation through interconnectors, is expected to make landfall on the east coast and in East Suffolk in particular.

The government has recognised that the lack of transmission capacity is a major contributor to delays in the development of offshore wind generation projects. National Grid Energy Transmission (NGET) is under increasing pressure to increase network capacity more quickly to facilitate connection of generation in meeting the UK target of up to 50GW of offshore wind by 2030.

However, given the uncertainty of the volume and speed of development of generation from all the existing proposed projects in the East Anglia area, there remains significant uncertainty with regard to the need and timing for this proposed reinforcement. The impact of new energy infrastructure and construction on the Suffolk coast for transport, tourism, the local environmental, housing and social and community facilities has already been put into sharp focus by Sizewell C proposals – so consideration needs to be given to cumulative impact. Delaying the decision to commit to an expansion of the East Anglia network whilst additional reviews are undertaken would ensure the risk of unnecessary investment is reduced.³

Given the government's commitment to achieving net zero by 2050, the future growth of offshore wind and electricity interconnectors will require innovative and potential offshore solutions to minimise the onshore impact of the associated infrastructure. One possible solution is for offshore wind and interconnectors to be connected via a modular offshore grid using offshore platforms and artificial islands connected to onshore brownfield sites. We note that East Suffolk Council has been urging investigation of alternative options to Sealink and has commented on the regrettable lack of holistic planning regarding energy infrastructure and the sensitivity and value of the East Suffolk environment.

We support several of the key stakeholders including the Rt Hon Therese Coffey MP in calling for:

- a government review of all onshore energy connections along the Suffolk coast,
- a commitment to carry out a comparative study, including already suggested brownfield sites such as Bradwell, Tilbury and the Isle of Grain, and
- a proper assessment of the environmental impact of these connections before proceeding any further.

The government's emerging National Policy Statements make clear that transmission operators are expected to be able to demonstrate how the optimum onshore connection locations have been identified, and how environmental, community and other impacts have been considered but this cannot be achieved without a full assessment of brownfield alternatives.

There is still time for the National Grid Electricity Systems Operator and the Department of Energy Security and Net Zero to reevaluate the merits of an alternative offshore strategy that would transmit power direct to brownfield sites much closer to the larger scale populations that these energy projects will serve. However, this review needs to be undertaken swiftly with a moratorium imposed on existing, and any future approvals, for grid connectors and consequential landfall and onshore infrastructure to ensure it is not too late to have any impact on projects that are already planned for East Suffolk.

³ East Anglia Transmission Network Reinforcements – Hiron Smart Energy Networks – September 2023

We are concerned that the process for determining the connection point of the three emerging energy projects in East Suffolk - Sealink, Lion Link and Nautilus - is within the overarching responsibility of National Grid, a single commercial entity, offering no means of reasonable challenge by individuals, groups, communities, and local authorities. As each project is brought forward, it is assigned a connection point individually therefore no holistic assessment of impacts can be undertaken.

Should the Nautilus, Five Estuaries and North Falls projects be granted a combined connection at the Isle of Grain, potentially from an offshore modular grid, the coordination between these projects and Sealink and Lion Link should be reviewed once more to ensure an appropriate coordination solution is achieved. Under no circumstances should these projects be allowed to progress individually to inflict sequential and geographically separate solutions for their connections into the Sizewell to Bramford overhead power lines, whether or not the Scottish Power Renewables substation at Friston is finally approved following the decision of two Judicial Reviews.

The lack of forward planning for the associated onshore infrastructure will result in unnecessary and repeated levels of disruption for the local population, harm to its tourist industry, and considerable damage to the coast and countryside to the detriment of the general amenity of this area for many years.

Sealink Proposals – General Observations

Saxmundham Town Council is opposed to the development of Sealink as presently proposed.

Growth in offshore wind generation, along with potential new interconnectors to Europe, and nuclear generation development in East Suffolk, will make a significant contribution to reaching the government's net zero targets. The generation in this area could potentially meet some 25%-50% of UK demand at any given time depending on the prevailing wind conditions.⁴

Peak demand in the East Anglia area is circa 1.5GW and is anticipated to grow to circa 2GW by 2035.⁵

Sizewell B nuclear power station will continue to generate 1.2GW, Sizewell C will generate 3.3GW, the cumulative offshore windfarms will generate 1.7GW, and the two interconnectors will transfer 3.1GW, which is a potential total of 9.3GW transmitted in East Suffolk alone.⁶

The connection to the Sizewell to Bramford overhead power lines, provided by the proposed substation at Friston, will have the capacity to transmit in the region of 6GW to the network.⁷ It is therefore clear that the Sealink project is only necessary to take excess electricity from Suffolk to Kent and brings no benefits to the immediate area.

The proposed Sealink landfall locations, cable corridors and convertor station site are based upon the assumption that the substation north of Friston will be approved and constructed. The Development Consent Orders granted to Scottish Power Renewables to build the substation for the EA1N and EA2 windfarms are still subject to legal challenge by means of two Judicial Reviews.

In our opinion, the greenfield site at Friston is entirely unsuitable for a substation on the scale proposed by Scottish Power Renewables and we note that it will require expansion to accommodate

⁴ East Anglia Transmission Network Reinforcements – Hirons Smart Energy Networks – September 2023

⁵ East Anglia Transmission Network Reinforcements – Hirons Smart Energy Networks – September 2023

⁶ National Grid ESO – Transmission Entry Capacity (TEC) Register and Interconnector Register

⁷ National Grid Sealink Project Adviser

the cable sealing ends and additional pylons for the three converter stations. Given that there is no existing grid connection at Friston, which is an enabling project, it is wrong for multiple projects to seek connection at this location.

We would like to see a review take place including an exploration of alternatives. Our comments are premised on this starting point. However, should the infrastructure development be consented along the lines of current proposals, we would put forward the case for mitigations, some of which we cover in this response.

Community Engagement

Local authorities are key to representing community interests and helping negotiate community benefits with infrastructure developers. Our ability to do so is not only dependant on strategic negotiation, but also on whether developers are willing to engage at an early and formative stage of the process. Throughout the consultation process, NGET held a series of face-to-face events including public information exhibitions, 'ask the expert' sessions, and webinars. They have also provided paper copies of the project proposal documents by post to all local households, at deposit points, on request, and by electronic download from the project website.

However, feedback from our community has shown that people have found it challenging to gain a meaningful understanding of the Sealink proposals. This has curtailed their ability to properly engage with the local authorities who represent them and, in turn, enable us to influence the strategic planning of the infrastructure to avoid potential impacts and, where impacts cannot be avoided, to ensure they are reduced, mitigated or compensated against. A rushed consultation with responses to be submitted pre-Christmas is also not appropriate; this consultation needs more time.

Feedback from the public information exhibitions included observations that NGET personnel gave conflicting answers to questions posed, the maps were shaded in such a way as to obliterate any detail of the proximity of the nearby residential areas to the converter station site, the trees on the 3D model were inaccurately shown as higher than the converter station and, again, the proximity of the residential area was not included, and the attenuation pond at the converter station site assumed that water would run uphill.

The complexity of the Sealink project and volume of information means communities and local authorities also face challenges in resourcing and keeping up with the consenting process, particularly during the examination stage. With reference to the Sealink and Lion Link consultation deadlines, the Planning Inspectorate (PINS), at a meeting held on 20 June 2022, advised 'The Inspectorate responded that considering the amount of consultation in the East Anglia region, the application should be aware of what procedures can be taken forward in a combined matter to minimise resourcing pressures.' Should the three projects proceed, we request that NGET and NGV combine consultations and the DCO examination process as the onshore impacts for all three projects are similar and may become identical.⁸

We welcome the government reforms to incentivise early, constructive engagement with infrastructure developers to address impacts early to reduce the burden on local authorities and communities at the later stages of the consenting process. We also support the government's intentions to increase funding to local authorities to provide tangible improvements to securing benefits to improve project outcomes and to build capability and capacity across authorities, share

⁸ Information sourced from Friston Parish Council's response to the Sealink and Lion Link non-statutory consultations

learning, and encourage more efficient and effective local engagement with NSIPs and infrastructure developers. We ask that this funding is extended to Town and Parish Councils affected by Nationally Significant Infrastructure Projects. Furthermore, we approve the government's recent reforms⁹ to expect infrastructure developers to demonstrate how the views of affected communities have been considered and what measures have been taken as a result as part of the Development Consent Order application.

Traffic Impacts

General Observations

We are concerned about the lack of clarification and lack of data at this statutory consultation stage which makes it difficult to comment on the likely traffic impacts in the town and parish. We exhort NGET to undertake a full Traffic Impact Survey and Assessment, to be included at the Environmental Statement (ES) stage, and agree necessary mitigation prior to the submission of the application for a Development Consent Order.

There are likely to be impacts to traffic volumes and highway safety due to the cumulative effects of numerous major infrastructure projects in the area and the development of the Saxmundham Garden Neighbourhood which NGET, whilst acknowledging existence of, have not considered in their modelling of assumed increases in traffic flows. Whilst agreeing to review the Garden Neighbourhood as part of the ES, NGET noted that this would be subject to more information being available.¹⁰

The effect of construction works on the preliminary infrastructure and at the converter station site will increase traffic congestion and create intra-project cumulative effects which may:

- deter shoppers from visiting the town centre and impact the economic viability of the independent High Street shops,
- deter residents and visitors from visiting the town's many amenities.
- deter tourists from using the town's holiday accommodation, and
- devalue and reduce demand for properties adjacent to the access roads and converter station site.

Mitigation

It is vital that Saxmundham remains as an attractive place to live, work and visit. If the Sealink proposals are consented, we therefore will seek, without prejudice, as part of any Traffic Impact Survey and Assessment, that NGET consecutively includes a feasibility study for road calming/one way traffic or pedestrianisation of the town's High Street.

Proposed Access Routes

⁹ Department for Levelling Up, Housing and Communities Nationally Significant Infrastructure: Action Plan For Reforms To The Planning Process – February 2023

¹⁰ NGET Preliminary Environmental Impact Report, Vo 1, Part 2, Chapter 12, Health and Wellbeing

NGET has identified two potential construction vehicle routes that we identify as the 'North Access Route' (via Kelsale) and the 'South Access Route' (via Benhall).

NGET has identified that prior to construction of either the North or South Access Routes that HGV vehicles will access the site from the A12 via Benhall, South Entrance, Church Road and Church Hill to the B1121, which we identify as the 'Initial Stage'.

Initial Stage

We are concerned about increased HGVs movements during the Initial Stage due to:

- the increase in traffic at the already congested controlled junction in the town centre which is widely used by pedestrians, cyclists, mobility scooters, HGVs, LGVs, buses and cars,
- the potential for delays to emergency vehicles who use this route,
- pedestrians, including young and elderly people, often do not wait for the signal at the controlled crossing indicating it is safe for them to cross,
- school children board and alight from buses daily at the South Entrance traffic lights,
- shoppers, particularly those with mobility issues, and delivery vehicles often stop, in contravention of traffic orders, in the High Street which compounds congestion and the potential for accidents,
- during the winter months when the sun is low on the horizon, glare can occur on this route obscuring visibility leading to the potential for accidents,
- Church Road is at times extremely congested with Tesco and Waitrose shoppers and delivery vehicles, bus stops both sides of the road, and a zebra crossing that is quite obscured at times due to queuing vehicles,
- Pedestrians, including young and elderly people, often do not use the zebra crossing on Church Road which increases the potential for accidents,
- there is no footpath from Manor Gardens into the town centre. Pedestrians must cross the road at the top of Church Hill to access the town and bus stops. Several residents identified that this is already potentially dangerous. Increased traffic at this location will compound the problem,
- to avoid the access road construction works, normal traffic habits may change, resulting in traffic to the town centre diverting to Rendham Road, Mill Road and Chantry Road. This is a densely residential area with two schools and the consequent dangers of increased traffic to pedestrians, particularly due to the lack of a continuous footway and the number of families with young children who use the zebra crossing on Rendham Road,
- the NGET data¹¹ is incorrect as it omits Chantry Road from this alternative route. The very narrow carriageway at the controlled junction, the weight limit of 7.5 tonnes, and the restriction to traffic flows twice per hour due to the level crossing has not been considered.

¹¹ NGET Preliminary Environmental Impact Report, Vol 1, Part 2, Chapter 8, Traffic and Transport, Table 2.8.9.32

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

- all NGET traffic must avoid the busy shopping and travel to work and school times,
- NGET must liaise with Suffolk County Council to ensure there is no conflict with roadworks,
- the zebra crossing between Waitrose and Tesco should be upgraded to a controlled pedestrian crossing,
- a zebra crossing should be installed at the top of Church Hill opposite the bus shelter,
- NGET should identify ways to deter vehicles from diverting to alternative routes such as Rendham Road, Mill Road and Chantry Road.

North Access Route

The North Access Route will cross the railway line and proceed to the east of houses that are part of the Church Hill development to the B1119 Saxmundham to Leiston road, from whence it will continue to the converter station site.

- This will cause delays for people travelling by car from Leiston, but due to the distance involved an alternative route will likely not be sought, and the outcome could deter shoppers from Leiston travelling to Saxmundham.
- The receptors living in the east part of Church Hill will be subject to intra-project cumulative effects of noise, vibration, air pollution and light pollution during the construction of the access route and converter station site.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

- the North access route must be built below the brow of the hill to provide a natural barrier against noise, air and light pollution, and visual amenity.
- HGVs must not use the access route during unsocial hours which includes weekends.
- earth bank works should be considered to lessen impacts such as noise, vibration, air and light pollution and visual amenity.
- houses near the access route should be offered triple double glazing and other noise mitigation measures.
- we request that NGET funds a feasibility study to address the long-identified hazards and issues in the High Street. Upgrading the North access route to a fully adopted highway connected to the B1119 for all traffic may offer opportunities for legacy benefit by providing a vehicular route from the north to the supermarkets via Church Road thus avoiding the busy traffic light-controlled crossroads in the town centre, increase pedestrian safety by

allowing for wider pavements,¹² and provide for a more convivial shopping experience in the High Street.

South Access Route

The South access route from the A12 passes the outskirts of Benhall then crosses the River Fromus to the converter station site.

- An access route on this site will be damaging to the setting of Hurts Hall, a grade II listed building, the landscape of the park, and the cultural heritage of Saxmundham. The Saxmundham Neighbourhood Plan identifies this area as a 'Green Gateway' due to its important public view. Developments which would have an unacceptable adverse impact on the landscape or character of the view will not be supported.
- There is a narrow footpath from the A12 along the B1119 from Benhall to Saxmundham, which is only suitable for single file walking. Young children walk along this route to and from Saxmundham and Benhall to attend primary schools in either parish. This is also a popular route for recreational cyclists. We consider that with increased traffic, pedestrians and cyclists may be reluctant to use this route and increased traffic will significantly increase the potential for accidents.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts.

- NGET to provide a safe footpath/cycleway from the A12 to South Entrance.
- Opportunities to enhance the Public Rights of Way and bridleways should be considered.

Cumulative Traffic Impacts

The above impacts do not consider the cumulative effects of other Nationally Significant Infrastructure Projects and other major housing and employment developments in the local area that will increase traffic movements.

Whilst acknowledging in the Preliminary Environmental Impact Report (PEIR) the existence of the Saxmundham Garden Neighbourhood, comprising some 800 dwellings and the construction of a new roundabout and adjacent works for an employment area, NGET have ignored the cumulative traffic impacts as the proposals have not yet been submitted for planning consent.

Should either project coincide, there is a potential, with major works to the east and west of the town, that the cumulative effects of greatly increased traffic on Saxmundham will contravene the provisions noted in paragraphs 110-113 in the National Planning Policy Framework.

NGET, whilst acknowledging that works are being scheduled at Carlton Meres Holiday site, have not accepted that they should be considered as a cumulative effect on traffic. We disagree, as the works, whilst small on their own, should be included due to the large scale of works proposed in the area.

¹² [Saxmundham High Street café owner speaks after 'disaster' | East Anglian Daily Times \(eadt.co.uk\)](https://www.eadt.co.uk/news/saxmundham-high-street-cafe-owner-speaks-after-disaster/)

Saxmundham will be affected by Sizewell C, not least in the construction phase lasting 10-12 years. Road traffic will pass through on the A12 and night-time freight trains to Sizewell passing through the town centre will add to the transport and environmental pressures.

It is understood that the scale of construction traffic for these smaller projects is much less than for Sizewell C, however, we are concerned about the cumulative impact of potentially multiple energy infrastructure projects and other development proceeding over the same period of years.

We are concerned that increased levels of traffic on the A12 will increase the frequency of ‘rat running’ incidents along the minor roads, which were never intended for mass industrialisation, through Saxmundham and its neighbouring parishes.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts.

- we recommend that NGET collaborate with Sizewell C Co to use their park and ride facilities to the north at Darsham and to the south at Hatcheson to negate the need to provide workers’ car parking and reduce vehicle movements in and around Saxmundham, and to make use of the traffic incident management areas and postal consolidation facilities at both sites.
- We recommend that NGET collaborate with Sizewell C Co to use their freight management facility at Seven Hills to reduce the number of HGV and LGV movements in and around Saxmundham.

Visual Impacts

We are concerned that the development of the converter site will lead to industrialisation of the open countryside to the east of Saxmundham and due to the magnitude, will also adversely affect the open views to the south of the town next to Hurts Hall. Contrary to claims made in the consultation documents, this site is not naturally screened by adjacent woodland at Bloomfield’s Covert and thus existing screening to the west is unlikely to provide mitigation to the north, south and east. The huge converter station buildings will be out of keeping with the character and landscape of rural East Suffolk where the local architecture is predominantly of low build.



The above image¹³ clearly shows three converter stations to the right of Hurts Hall. Whilst NGET state that one convertor station would ‘appear with a small part of the horizontal panorama in a break in vegetation in the middle ground’ and ‘would appear at a similar scale to Hurts Hall but would be out of character in the existing view’, they conclude it ‘would not be the focus of the receptors moving along and adjacent to the B1121’.¹⁴ We disagree with this and contend that this should be tested thoroughly against National Policy Statement EN-1, 5.9.21 and the Saxmundham Neighbourhood Plan.

The Neighbourhood Plan states¹⁵ that there are ‘a number of important views and vistas’, that should be protected, as they are important ‘to the overall landscape character of the parish and which can be enjoyed from publicly accessible locations, e.g., footpaths, public highway, an existing open space, or through a gap between buildings’.

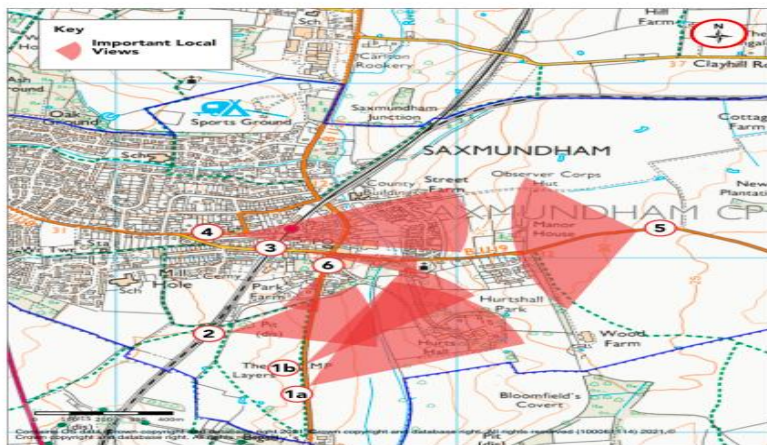


Figure 23: Important Local Views (source: Parish Online with own annotations). Blue line denotes parish boundary.

1a. ‘View from the B1121 looking across to Hurts Hall and St John’s Church: The road undulates and at the top of two rises there are open views across to the Church and Hurts Hall which are both important landmarks’.



2. ‘View from the high point of The Layers looking across the River Fromus to Hurts Hall: Looking due east from the tree line which marks the western edge of The Layers, across open farmland and the River Fromus. This gives a wide view of Hurts Hall and its associated buildings, and

¹³ NGET Preliminary Environmental Information Report, Vol.3, Part 2, Chapter 2, Figures 2-6

¹⁴ NGET Preliminary Environmental Information Report, Vol.1, Part 2, Chapter 2

¹⁵ Saxmundham Neighbourhood Plan, Para 11.31

the backdrop of rising wooded land. It demonstrates the contrast between the open landscape of the valley and wooded ridge, below which the town sits.”



We consider that the siting of the converter station(s) in this location contravenes our Neighbourhood Plan and NGET have not considered the loss of an important view against National Policy Statement EN-1 5.9.21.



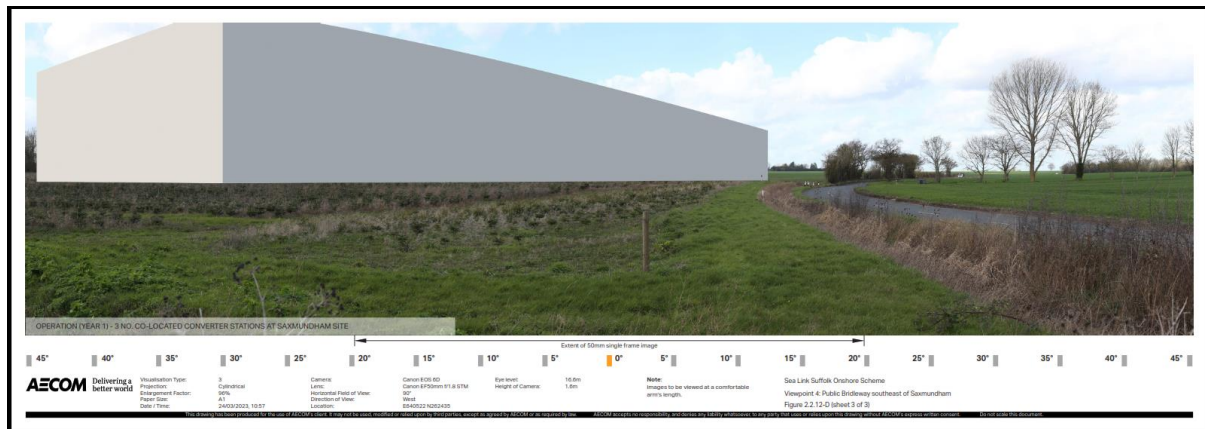
The above image shows three converter stations with the historic Wood Farm dwarfed to the right. The proposed converter station site is on the top of a plateau. The Neighbourhood Plan states:

5) ‘View towards the town from the B1119. The approach from Leiston is across a wide-open plateau. Looking west at point about 400m east of the access to Wood Farm the view of tree line along the ridge becomes conspicuous, the town below is hidden, but the view of the trees and the change in the landscape is the first clear indication that the town is nearby.’



We consider that the siting of the converter station(s) in this location contravenes our Neighbourhood Plan and NGET have not considered the loss of an important view against National Policy Statement EN-1 5.9.21.

NGET’s proposals to locate up to three converter stations on Saxmundham’s settlement boundary is considered overdevelopment and it is not acceptable.



The above image, just outside Saxmundham on the B1119, is based on three converter stations. The image appears to be misleading, as are others, with regards to height. With the proximity to the road, there is no scope for visual mitigation. The result is that visitors travelling from Leiston to Saxmundham will be greeted by an industrial landscape that is totally out of keeping with the culture of our predominantly rural market town and adjacent villages. Again, we refer to National Policy Statement EN-1 5.9.21 and suggest that any proposed development is modified. Additionally, we refer to National Policy Statement EN-1 5.9.19 as NGET have omitted to acknowledge that there is no similar infrastructure in the area.

In conclusion, we object to the proposed converter station(s) due to the loss of important views. The visual impact would create intra-project cumulative effects by deterring tourists and potential house buyers from visiting or living in the town. Moreover, the reduced desirability to visit and live in the town will affect the viability of local shops and amenities.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

- reduce the number of proposed converter stations to one and site it further east, thus mitigating the loss of views in and around Saxmundham,
- ensure that the converter station architectural design is sympathetic and blends, as much as possible, into its rural setting by incorporating NGET’s proposed green roof,
- manipulate the form of the converter station, part-bury it, and/or raise the height of the land to reduce the height and the visual impact,
- plant shrubs and copses of trees around the converter station site to hide its scale, provide natural screening, preserve views, and increase biodiversity,
- clad the building with colours and textures sympathetic to the local landscape.

Environmental Impacts

DEFRA has developed a biodiversity gain statement which sets out the detail of the biodiversity net gain requirement for NSIPs. All terrestrial NSIPs from November 2025 are expected to achieve at least 10% measurable biodiversity net gain for at least 30 years.¹⁶ We note NGET supports this aspiration for the Sealink project.

NGET advise that the 'majority of the ecological environment impact assessments are underway or have yet to commence, and therefore the amount of field survey data in this PEIR is limited'.¹⁷

Moreover, most of the work undertaken to date is based on desk studies.

We are concerned that this work has not been undertaken and we expect it to be fully complete for inclusion prior to the submission of any application for a Development Consent Order. We will then be able to comment fully but we make the following observations.

Flooding and River Condition Impacts

NGET propose to install an access road over the river. The drift soil at Wood Farm is clay and is very well managed by the landowner to ensure that it drains efficiently, with water draining to well-maintained field ditches. The proposed construction of the converter station and associated works compounds and roadworks will impact on the land creating water run-off. This will impact the quality of the river, especially if the run-off floods the roads prior to entering the water courses.

The introduction of a bridge will detrimentally alter river habitats.

Flooding, and in particular surface water flooding, is of extreme concern to the community and there have been historical and recent incidences of flooding in the town. Construction of a converter station will inevitably exacerbate the situation. National Policy Statement EN-1 requires that all sources of flooding be considered as part of site selection. We strongly recommend that NGET undertake a sequential test for ground water flooding on the Wood Farm site.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

- NGET should provide a fund for river protection and improvement between Kelsale, Saxmundham, Sternfield and Benhall to offset and reinstate lost or damaged habitats.

Wild Life Impacts

It should be noted that farmland, whilst not environmentally obviously diverse, plays an important role in the ecological system. There has been a dramatic crash in farmland birds, due to modern

¹⁶ Department for Levelling Up, Housing and Communities Nationally Significant Infrastructure: Action Plan For Reforms To The Planning Process – February 2023

¹⁷ NGET Preliminary Environmental Impact Report, Vol 1, Part 2, Chapter 3, Ecology and Biodiversity, Tables 2.3.5.5 and 2.3.6

intensive methods and loss of habitat.¹⁸ Sightings of animals (although not an exhaustive list) in the area include those found in agricultural and river settings:

Skylarks	Badgers
Buzzards	Hedgehogs
Sparrow Hawks	Red Deer
Red Kites	Muntjac Deer
Kestrels	Grass Snakes
Barn Owls	Slow Worms
Tawny Owls	Adders
Cuckoos	Field Mice
Kingfishers	Bats
Woodpeckers	Hares
Swifts	Foxes
Marsh Harriers	Possibly water voles
Lapwings	

Mitigation

Without prejudice, we would propose the following if the project proceeds, to mitigate the impacts:

- arable land should be properly surveyed for birds and wildlife and compensation offered for any loss of habitat that might affect uncommon or rare species,¹⁹
- for adequate drainage it will be necessary to continually reinstate ditches. NGET should consider curving ditches which provide improved and diverse micro-habitats for wildlife.
- similarly re-introduced hedgerows should not be straight but curved.
- the loss and diversion of Public Rights of Way is of concern, not only for wildlife but for human receptors. We strongly propose that the environmental offset includes a green pathway from near the converter site to Friston, thence to join the Suffolk Coastal Path north of Aldeburgh. Green corridors provide a haven for wildlife and improve wildlife diversity.

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Light Impacts

Light pollution, not only effects human receptors adversely, but wildlife too.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the impacts:

- All lighting should be shielded to prevent diffusion.
- Protectors should be fitted to all lights to stop the disruption of insect breeding.

Noise Impacts

¹⁸ Information sourced from The Friends of the Earth response to the Sealink statutory consultation.

¹⁹ Information sourced from The Friends of the Earth response to the Sealink statutory consultation

There are concerns about exposure to operational noise from the convertor transformers, the transformer cooling fans and the valve cooling fan banks, all of which will be external to the convertor station buildings for safety reasons and to allow sufficient airflow, and these will operate continuously day and night.

Manor Gardens and parts of the Church Hill development are especially close to the proposed site and access road. Noise pollution creates issues for those that live nearby, especially those that suffer sensory noise related health problems and for people who work from home. We are very concerned that the proposed works will create mental health and general health conditions.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

- the supply of triple glazing and other noise mitigation measures for affected properties,
- during the construction phase, NGET should ensure that noisy work is minimal and within industry standard limits,
- NGET should follow EDF's policy and undertake preliminary environmental work by creating a treeline barrier next to the potentially affected properties. Should the project proceed, young trees planted now would provide a buffer against light and noise pollution.

Greener Environment

We are committed to supporting a greener environment. Whilst we appreciate that the proposed Sealink project is involved primarily in the transmission of offshore wind generated electricity that we endorse, the converter station and associated access roads negate any efforts that we have already undertaken to provide a greener environment.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required, via a Deed of Obligation, to offset the carbon footprint created by NGET:

- at least one, locally shared, wind turbine, to offset households in the Saxmundham Conservation Area that are not permitted to install solar panels, to reduce electricity costs generally for the residents of Saxmundham and local villages, or alternatively to provide a fund to improve the quality of life for residents,
- a small-scale solar allotment scheme that benefits the town.

Socio-Economic Impacts

The infrastructure developers justify much of the environmental and economic damage by extolling the local benefits to the community. However, the onshore infrastructure of the Sealink project creates no long-term employment opportunities and no local investment. In fact, the proposed project creates a situation ultimately leading to unemployment and decline.

During the proposed construction phase, especially considering the cumulative impacts of other major projects in the area, traffic and construction works will be a barrier to tourists and potential

house purchasers. Consequentially, the High Street shops, restaurants, hotel and tourist attractions will likely witness a decline, and this will result in a loss of jobs. When operational, the converter station will be a visual deterrent to visitors and potential house purchasers which will also negatively affect local shops and amenities.

It is vital that Saxmundham gains a meaningful long-term legacy for the local economy and the community to offset the environmental and economic damage caused by the siting of onshore electricity transmission infrastructure.

Mitigation

Without prejudice, if the development is to proceed, we believe the following will be required to mitigate the above impacts:

Historically the wages and educational levels in this area are lower than the national average.²⁰ We strongly suggest this is addressed by the introduction of a Skills Training Centre²¹ funded by NGET, NGV, and EDF with the support of the Joint Industry Board and the Engineering Construction Industry Training Board who is currently actively seeking to fund new training centres.

There are suitable premises becoming available in Saxmundham for a jointly funded training facility. Saxmundham and the locale also benefits from regular train services from Lowestoft and Ipswich, local bus services and the proximity to the A12, thus is centrally placed to attract suitable applicants from a radius of 50 miles. The provision of a training centre will increase long-term prosperity for the town.

Cable Route Impacts

The choice of the landfall location between Aldeburgh and Thorpeness, the substation site at Friston, and the converter station site at Saxmundham inevitably leads to inappropriate cable routes through unspoilt countryside, including the Suffolk and Essex Coast and Heaths National Landscape, which is of great value to the local tourist industry.

The selection of Saxmundham for the converter station, as opposed to Blackheath Corner near the junction of the B1069 and A1094, involves a wider swathe of both AC and DC cables to the north of the proposed Friston substation, up to 200m wide if all three projects are accommodated. The Saxmundham converter station site requires an unnecessary long HVDC cable corridor which passes Friston and will therefore need to double-back on itself to connect to the substation.

The cable routes also impact on the many Public Rights of Way (PRoW) which would suffer closure and diversion during the construction period. This extensive network of PRoWs are important to both local people and especially to local tourism which draws visitors from far and wide to enjoy the open and accessible landscape.

²⁰ Saxmundham Neighbourhood Plan, Para. 2.9

²¹ As modelled by the Engineering Construction Industry Training Board (ECITB) and Joint Industry Board (JIB) Training Centre, inaugurated to train local unemployed people and apprentices for employment with Sizewell B Main Contractors and Nuclear Electric, Sizewell B (now owned and operated by EDF). The centre was financed jointly by the contractors, the client, and government funding.

The land above and around the cable swathes could eventually be restored but it will not be possible to plant trees and shrubs directly above the cables resulting in the permanent loss of wildlife habitats.

Cumulative Impacts

This response to the Sealink statutory consultation combined with the Nautilus and Lion Link non-statutory consultations relevant to the project, has identified that there is insufficient coordination between the three National Grid projects, the two Scottish Power Renewables projects, and the Sizewell C project.

This has resulted in sub-optimal individual project proposals which ignore or significantly downplay the opportunities to reduce cumulative impacts and leave meaningful legacy for this area which will endure significant disruption and industrialisation of its landscape over decades.

We understand that the Scottish Power Renewables project to create a substation at Friston has been delayed by two years and therefore there is the potential for Sizewell C, EA1N and EA2 offshore wind farms, and the Sealink, Lion Link and Nautilus interconnectors to be in the construction phase concurrently from 2026 to 2030.

There is a risk that the cumulative impact of these projects will displace the resident population, severely impact the local road network, and deter tourists from visiting.

No assessment has been made of the accommodation needs of construction workers for Sealink. NGET should undertake this assessment, cumulatively with all known projects for the area, to ensure that local people and residents are not displaced or priced out of the market.

The health and wellbeing of local people has already been badly affected for years by other proposed energy projects. All projects associated with the substation at Friston should be brought together in one set of consultations and DCO examination to shorten the length of time residents are subject to the stress of the examination process and, importantly, so that people can fully understand the cumulative impacts.

Conclusion

For the reasons set out above, Saxmundham Town Council strongly opposes the Sea Link project and all the options set out in the consultation document.

We are concerned that there is no guarantee that all the projects proposed for this area will be progressed in a way that will minimise the damage during construction and will be sympathetic to the impact on the landscape and amenity once operational. We set out similar concerns in our responses to the Sizewell C consultations.

While we support the commitment to explore the potential for co-location, this is only acceptable if the infrastructure is sited in an appropriate place. There is no evidence within the consultation documents that alternative locations have been considered for the three projects, given that the main requirement for power seems to be in other parts of the country.

We are concerned that these proposals do not consider the wider potential opportunities to create a more coordinated and less impactful result for East Suffolk. Thus, we will seek a moratorium on any

development until it is reviewed by a government led enquiry. These projects should be viewed holistically, as well as other electricity network infrastructure developments, and a suitable solution for East Suffolk and the country should be sought.