

# National Grid Electricity Transmission Sea Link

## Summary of design amendment following Targeted Consultation

### Saxmundham Town Council Response

Saxmundham Town Council refers to our responses to the Statutory Consultation of December 2023, and Additional Consultation of July 2024 and confirms that our position on the proposed project has not altered.

Our responses to your 'Summary of design amendment following Target Consultation, Version A' of November 2024 are as follows:

#### **Draft Order Area in respect of land for National Grid Ventures:**

We note the reintroduction of draft order areas to accommodate land for National Grid Ventures ('NGV') should they wish to proceed with the Lion Link project. We are dismayed that this is not coordination of projects. It is solely co-location. Therefore, we reiterate our comments in response to the July 2024 Additional Consultation:

'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 NGV is disappointing.'

Whilst the Nautilus project is finally withdrawn from Suffolk, this non-cooperation between two companies trading under National Grid, seemingly removes the need to account for cumulative effects of both two proposed converter and infrastructure projects. Accordingly, Saxmundham Town Council reiterates our demand in our original 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.'

#### **Key Changes for Landscape and Visual and proposed mitigation:**

As previously noted in our response of July 2024, Saxmundham Town Council strongly objects to the access across land between Bigsby's Corner and Saxmundham.

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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)

We are pleased that NGET have accepted that the first bridge route would have destroyed a Champion Tree and have mitigated by re-routing the access road and bridge crossing. Furthermore we are pleased that NGET are endeavouring to reduce the height of the bridge from 6 metres to 4 metres which will aesthetically reduce visual impacts and, we trust, will also accordingly reduce the length of the approach. At this stage, we must emphasise that it is vital than any canopy over the River Fromus must be kept in balance with areas of full light and dappled shade along this stretch to keep the river healthy.

The new bridge location, some 40 metres further north will further adversely impact the following three important views as published in the Saxmundham Neighbourhood Plan and the Suffolk Coastal Landscape Character Assessment:

Views to Hurts Hall and St John's Church within an open farmland setting backed by wooded rising land from the B1121 (View 1a)

St John's Church (View 1b)

View from the high point of The Layers looking across the River to Hurts Hall (View 2).<sup>2</sup>

Saxmundham Town Council considers the decimation of the parkland aspect of Hurts Hall and rural outlook to be untenable. Considering that at least two 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.

Moreover as NGET agree at 1.2.3, the bridge will become more prominent in key Conservation views of the Grade II\* Church of St John the Baptist and Grade II Hurts Hall and will effect views from Hurts Hall. And, as noted in point 1.2.4, 'the bridge is likely to result in significant adverse effects on the setting of the Church of St John the Baptist and Hurts Hall'. Therefore we disagree with NGET at 1.2.4, that 'the proposed changes would not seriously affect any key elements of the special architectural or historic interest of Hurts Hall or the Church of St John the Baptist'. These views are integral to the southern access to Saxmundham and are important landmarks. Moreover, considering the historic importance of Hurts Hall to Saxmundham, NGET's assertion as noted above, will be challenged.

As noted in our response of July 2024, 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 is undertaken to identify an alternative operational access. Furthermore, should development 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.

Saxmundham Town Council is also concerned that the construction of the access road and bridge, together with the traffic that will use it will detrimentally affect Hurts Hall with intra-project cumulative impacts of noise, dust and light pollution created by the bridge, road and converter

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<sup>2</sup> Saxmundham Neighbourhood Plan, Para. 11.31; Also refer to: Suffolk Coastal Landscape Character Assessment, pp. 23-25.

station construction. This should be addressed by NGET. The likelihood of mitigation is negligible and thus to reduce residential disturbance, construction of the road and subsequent use of the road must be restricted to 8.00am to 6.00pm with no movements at weekends.

Without prejudice, if the road and bridge scheme proceeds, it is vital that mitigation is thoroughly provided to reduce the visual impact of both the bridge and the access road. Saxmundham Town Council welcomes the involvement of an architect to create a bridge that reduces the impact of the visual decimation. Moreover, the proposed road should be lined with mature trees with NGET, after planting, either undertaking the maintenance of the trees, including regular watering or financing a Tree Fund to protect and monitor the new plantings.

### **BNG land, river, mitigation and enhanced land**

We are pleased that existing farmland close to Saxmundham will be developed to include 'skylark plots' but there will be more species requiring mitigation than just skylarks. Importantly, we are concerned that land along the River Fromus, formerly identified as Biodiversity Net Gain, has been removed from the draft order area.

Whilst, a lower access bridge, if agreed by the Environment Agency, would likely equate to shorter access ramps, we are still exceedingly concerned about the potential for surface water flooding due to construction plant and vehicles compacting and trenching the surrounding land. Importantly, there still remains potential for increased river pollution due to run off from former agricultural land and introduction of pollutants from construction plant and vehicles. Without prejudice, to offset against the potential harm to the river from construction works we exhort NGET to finance a river fund that will also include Saxmundham's Boardwalk initiative that allows for floodplain mitigations.

Again, without prejudice, we reiterate that NGET should work with Saxmundham Town Council and our neighbouring parishes of Kelsale cum Carlton and Benhall and Sternfield to identify areas within the parishes to offset damage to the environment and tranquillity of our area. We reiterate our exhortation to NGET to demonstrate corporate social responsibility by aiming higher than achieving a 'neutral' environment effect and ask should the project proceed, without prejudice that:

NGET supports and works with Saxmundham and surrounding villages to achieve our aspirations to offset environmental and social economic damage of the converter stations, by creating a green biodiverse area that both residents and visitors will embrace. As Andy Tickle argued, improvement of new infrastructure green credentials, spending more and involving the community has benefit for both sides.<sup>3</sup> Although not exhaustive, this should include provision of an environmental fund to improve and reconnect important habitats via green corridors, introduction of biodiversity stepping zones, and re-establishment of appropriate hedgerows to connect people to the environment, via footpaths and cycle ways constructed in tandem with environmental enhancements

### **Conclusion:**

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<sup>3</sup> *Greening the Great Grid Upgrade, A new vision for landscapes and communities in East Anglia*, Dr. Andy Tickle, Suffolk Preservation Society, Campaign for the Protection of Rural England: Essex and Norfolk, May 2024.

Saxmundham Town Council continues in our objection to the access road located between Bigsby's Corner, Benhall and Hurts Hall due to the decimation of local views as identified in our Neighbourhood Plan. Whilst, still objecting to the entire converter scheme project, we suggest, without prejudice, those mitigations as suggested above and within Tickle's report, *Greening the Great Grid Upgrade* would prevent Saxmundham and area becoming nothing more than an industrialised energy cluster.<sup>4</sup>

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<sup>4</sup> Ibid.