

National Grid Electricity Transmission – Sea Link – EN020026

Saxmundham Town Council – Relevant Representation

1. Executive Summary

- 1.1 Saxmundham Town Council submits this Relevant Representation to express its serious concerns regarding the application from National Grid Electricity Transmission for a Development Consent Order for Sea Link. While we acknowledge the strategic importance of strengthening the UK's electricity transmission network, we do not accept that the Sea Link project, in its present form, is the right way to achieve that objective, and we consider that the applicant has failed to demonstrate due or sufficient regard for the adverse environmental, social, and economic impacts of the scheme.
- 1.2 Saxmundham Town Council is **strongly opposed to the proposed siting of the converter station** in close proximity to the town's residential areas. Its dominant visual presence would irreversibly transform open farmland into an industrialised landscape, causing lasting and unacceptable harm to the character of the town and its area and the wellbeing of local residents.
- 1.3 While the logic of the Sea Link proposal is to transmit energy from land via sea to Kent, the choice of Saxmundham as the location for the converter station involves, paradoxically, an extension of infrastructure and cabling inland, adding greatly to the disruption and disturbance.
- 1.4 In addition, although not the subject of this examination, National Grid Ventures' Lion Link project also proposes to co-locate a converter station near Saxmundham. It is essential that the cumulative impacts and disturbances of both proposals are considered together, as well as individually.
- 1.5 Our principal objections and concerns relate to:
 - 1.5.1 **Visual and Landscape:** the converter station would constitute a permanent and dominant industrial presence into open countryside that currently defines the rural character of Saxmundham. The scale, height and lighting of the proposed infrastructure would cause long-term harm to valued views, tranquillity, and tourism appeal.
 - 1.5.2 **Construction Impacts:** the introduction of an access road and bridge, construction site and compounds, and extensive cabling works would cause long-term disruption to the local road network and raise risks to health and wellbeing.
 - 1.5.3 **Noise and Disturbance:** Construction and operational noise, dust, vibration, and light pollution are likely to have severe effects on residential amenity, especially for residents and wildlife in the vicinity of the converter station site, access road and bridge, and construction compounds.
 - 1.5.4 **Socio-Economic and Reputational Impact:** Saxmundham's growing economy is rooted in its rural identity, heritage, and landscape setting. The town's attractiveness to new residents, businesses, and visitors would be significantly diminished by the imposition of large-scale

energy infrastructure. The proposal jeopardises key regeneration priorities and long-term investment in the town.

1.5.5 Biodiversity and Environmental Degradation: the development would result in irreversible habitat loss and harm to wildlife corridors, with insufficient clarity on how biodiversity net gain would be meaningfully delivered or enforced.

1.6 We also consider that the measures proposed by the applicant are inadequate and fail to reflect the scale of harm the project would cause. Saxmundham Town Council has put forward a range of positive, deliverable initiatives that respond directly to the disruption and long-term impacts on the community. We urge that these or similar proposals be developed in full consultation with affected communities and secured through clear, enforceable commitments.

1.7 We respectfully request the Examining Authority to recognise that a proposal of this scale must deliver not only national energy objectives but also safeguard the wellbeing of the communities it affects. Saxmundham Town Council considers that the current application fails to achieve this essential balance.

2. Introduction

2.1 Saxmundham Town Council is the first tier of local government for the town of Saxmundham in East Suffolk. As the democratically elected body representing the residents, businesses, and community organisations of the town, Saxmundham Town Council plays a central role in articulating local interests and safeguarding community wellbeing.

2.2 In accordance with the Planning Act 2008, Saxmundham Town Council is a statutory consultee in the examination of the Sea Link Development Consent Order ('DCO') application submitted by National Grid Electricity Transmission ('the applicant'). This designation recognises Saxmundham Town Council's proximity to, and likely experience of, significant impacts resulting from the proposed development.

2.3 This Relevant Representation sets out Saxmundham Town Council's principal concerns to the Sea Link proposal, an electricity transmission project which involves a new subsea and onshore connection between Suffolk and Kent, designed to increase network capacity and support offshore wind energy integration. The project includes a converter station near Saxmundham, underground cabling, and a marine cable route beneath the North Sea.

2.4 This Relevant Representation particularly objects to the siting of the converter station on the boundary of the parish. It also highlights the absence of sufficient mitigation and community benefit and puts forward constructive, community-driven proposals for consideration by the Examining Authority. Saxmundham Town Council's position is informed by formal resolutions, public consultation, and engagement with principal authorities.

2.5 Saxmundham Town Council welcomes the opportunity to participate in the examination process to ensure that the voices of our community are heard in the national infrastructure planning system.

3. Overview of Saxmundham

- 3.1 Saxmundham is a characterful market town in East Suffolk. It serves as a rural service centre and is surrounded by environmentally sensitive landscapes. Its identity as the 'Gateway to the Heritage Coast' reflects not only its geographical position and cultural significance, but also its strong transport links that connect inland communities with the coast. The proposed siting of the Sea Link converter station on high ground just outside the town poses a serious and irreversible threat to Saxmundham's character, growth and wider reputation, with a risk of it becoming known as the 'Gateway to the Electricity Coast'.
- 3.2 Saxmundham's population is currently around 5,000, having experienced steady growth in recent decades. Unlike its close neighbour Leiston, known for its proud engineering heritage, Saxmundham is a service centre for the surrounding rural area and has never had an industrial base or character.
- 3.3 The heart of the town is designated a Conservation Area and features numerous listed buildings dating from the 16th to 18th centuries, as well as several imposing Victorian townhouses and the iconic Market Hall. These architectural landmarks offer tangible evidence of Saxmundham's historical importance in the rural economy. Today, the town continues to function as a commercial and market centre for the surrounding villages, retaining its identity as a rural focal point.
- 3.4 Saxmundham's role as a centre for trade and exchange is centuries old. Its formal history as a market town began in 1272, when King Henry III granted a Market Charter. The town grew around this marketplace reinforcing Saxmundham's importance as a medieval trading hub. This tradition of rural centrality continued into the 19th and 20th centuries. Saxmundham hosted the Suffolk Show on fourteen occasions, often on The Layers, an open space just south of the town. The arrival of the railway in the mid-19th century was pivotal in expanding access to the town, bringing visitors not only to the Suffolk Show but also to its renowned livestock market, which operated until 1977. Though the old market has since closed, the town's strong transport links have ensured that its market town character thrives into the 21st century.
- 3.5 Today, Saxmundham maintains its heritage through regular markets and its role as a modern retail centre - home to two major supermarkets located opposite each other on Church Street. These commercial offerings are complemented by a variety of independent shops, bars, and cafes that contribute to the town's vibrant economy. The town also enjoys a growing calendar of community events that bring residents and visitors together throughout the year, alongside a wide range of amenities that enhance quality of life and social wellbeing.,
- 3.6 Saxmundham proudly embraces its current identity offering a unique blend of heritage, modern convenience, and connectivity. This combination lies at the heart of the town's enduring character and fosters a strong sense of belonging, community, and pride.

4. Overview of Local Impact

- 4.1 Saxmundham is characterised by its compact settlement pattern, heritage assets, and close-knit community. The surrounding landscape of open farmland and wooded valleys forms an essential part of the town's identity and appeal - supporting local wellbeing, biodiversity, and a modest but growing

tourism economy. Saxmundham serves not only its own population but also surrounding villages that rely on it for services, education, health care, and community amenities.

- 4.2 The proposed Sea Link converter station poses a disproportionate and deeply concerning threat to Saxmundham's rural character. Its scale, form, and proximity to residential areas are wholly incompatible with the town's setting. Key concerns include long-term visual harm, construction disturbance, and the cumulative erosion of local distinctiveness. These matters are explored in detail in subsequent sections.
- 4.3 This Relevant Representation outlines Saxmundham Town Council's strong objections to the siting of the converter station and associated infrastructure, as well as our wider concerns regarding:
 - 4.3.1 The scale, duration, and intensity of construction-related disturbance.
 - 4.3.2 Significant traffic impacts including congestion, safety risks, and disruption to residents, businesses, and emergency services.
 - 4.3.3 Risks to public safety and reduced emergency response capability.
 - 4.3.4 Lasting damage to the rural landscape, tranquillity, and public rights of way.
 - 4.3.5 Cumulative industrialisation and loss of local identity and distinctiveness.
 - 4.3.6 Harm to health and wellbeing from noise, air, and light pollution.
 - 4.3.7 Socio-economic impacts, including reputational damage and reduced visitor appeal.
 - 4.3.8 Absence of clear, enforceable mitigation and community benefit measures.

5. Proximity to a Rural Market Town

- 5.1 The proximity of the converter station is our primary concern. The proposed site is too close to both Saxmundham and Sternfield, situated on elevated ground and alarmingly near residential housing. Unlike comparable onshore infrastructure, such as the Viking Link and Hornsea converter stations which are located adjacent to major dual carriageway 'A' roads or sited in remote areas, this proposal represents an unprecedented imposition on a small market town and its surrounding communities.
- 5.2 While the logic of the Sea Link proposal is to transmit energy from land via sea to Kent, the choice of Saxmundham as the location for the converter station involves, paradoxically, an extension of infrastructure and cabling inland, adding greatly to the disruption and disturbance. This inland intrusion is not incidental but fundamental to the siting decision, and it intensifies the environmental and community harm that would otherwise be avoidable.
- 5.3 The proposal would introduce a vast industrial structure into a prominent rural landscape setting near the town's eastern and southern approaches, disrupting key views and affecting heritage assets such as the Grade II* listed St John the Baptist Church and the Grade II listed Hurts Hall. The full extent of

visual and landscape impacts is detailed in Chapter 6.

- 5.4 Although the applicant proposes landscaping mitigation,¹ it is acknowledged that such planting will take decades to mature, during which time the landscape will remain visibly industrialised. This prolonged visual intrusion is incompatible with the amenity of the countryside and conflicts with key policies in East Suffolk Council's Local Plan, which seek to protect and enhance rural character,² safeguard locally distinctive landscapes,³ and support the growth of sustainable tourism and outdoor recreation.⁴ The siting of large-scale industrial infrastructure in open countryside undermines these objectives and risks long-term reputational harm to the area's visitor economy.
- 5.5 Saxmundham Town Council respectfully invites the Examining Authority to undertake an accompanied site visit to fully appreciate the proximity of the proposed Sea Link infrastructure to residential properties and the town itself. A site inspection will provide essential context to understand the potential visual, acoustic, and amenity impacts on the local community - many of which cannot be fully conveyed through plans or written representations alone.

6. Visual and Landscape Impact

- 6.1 The landscape to the south of the proposed site is not naturally screened, leaving the 26-metre-high converter station highly visible. Its scale, industrial form, and prominence are wholly out of keeping with the character of the area. The development would represent a significant industrialisation of the countryside east of Saxmundham and would severely compromise the wide, open views towards the south of the town, particularly those adjacent to the historic setting of Hurts Hall.
- 6.2 The development would dominate key approaches to Saxmundham from the south and east, obstructing views from the B1121 and other local vantage points, including designated public rights of way. Particularly affected are open views across the River Fromus valley, an area valued for its tranquillity and natural beauty, and views towards the heritage assets of St John the Baptist Church and Hurts Hall. These features contribute meaningfully to the town's wider landscape setting and are referenced in the Suffolk Coastal Landscape Character Assessment as part of the 'Estate Sandlands' character area.⁵
- 6.3 Saxmundham's Neighbourhood Plan reinforces the importance of protecting these landscape views, that are central to the town's rural character and sense of place.⁶ Among them are key vistas across the Fromus Valley and the southern approaches to the town, which are visible from publicly accessible footpaths, roads, and open spaces. The Plan recognises these views as integral to the parish's landscape character, stating that "development that would significantly harm the character or appearance of these important views will not be supported."⁷ The proposed converter station would directly conflict with these policies, resulting in enduring visual harm and erosion of local distinctiveness.

¹ Sea Link – Outline Landscape and Ecological Management Plan – Suffolk (Application Document 7.5.7.1) (APP-348)

² SCLP10.4: Landscape Character – Requires that new development protects and enhances the distinctive landscape character of the district.

³ SCLP11.1: Design Quality – Emphasises the importance of protecting visual amenity and securing high-quality design that respects local context.

⁴ SCLP6.4: Tourism Development – Encourages tourism that supports the rural economy and protects the natural and built environment.

⁵ Suffolk Coastal District Council (2011). Suffolk Coastal Landscape Character Assessment, Part 2: Landscape Character Areas

⁶ Saxmundham Neighbourhood Plan Policy SAXS11

⁷ Sea Link – Outline Landscape and Ecological Management Plan – Suffolk (Application Document 7.5.7.1) (APP-348)

- 6.4 In addition, the proposed access road and associated bridge, reaching heights of up to six metres, would introduce visually intrusive infrastructure into an otherwise undeveloped rural location. This would require the removal of established trees and hedgerows and would result in permanent and irreversible harm to the landscape character and setting of Saxmundham's southern approach.
- 6.5 Saxmundham Town Council acknowledges that the applicant proposes tree planting around the converter station site as a form of visual mitigation.⁸ However, the applicant concedes that even after 15 years of operation, the converter station "would remain visible and a noticeable change in the composition of the view would remain, due to the scale and massing of the infrastructure." We note that newly planted vegetation takes decades to reach maturity, and during that time the converter station and its associated infrastructure - including fencing, lighting columns, and security measures - will remain highly visible. This prolonged visual blight, extending for over 40 years, is wholly unacceptable.
- 6.6 In addition, the applicant states that "the construction works associated with the River Fromus bridge crossing would result in significant visual effects."⁹ While such assessments are frequently caveated, Saxmundham Town Council remains deeply concerned that the views identified as important in the Saxmundham Neighbourhood Plan, particularly those across the Fromus Valley and southern approaches to the town, will be irreversibly harmed. We therefore reiterate the objections raised in our formal response to the applicant's statutory consultation.¹⁰
- 6.7 Furthermore, tree planting along the River Fromus bridge crossing is anticipated to only "partially" offset the loss of existing vegetation, indicating that the effectiveness of landscaping in restoring the area's character is limited and long-term.¹¹
- 6.8 The visual impact during construction will be even more severe. The applicant anticipates the presence of "large-scale uncharacteristic machinery and materials" and acknowledges the obstruction of "views across arable farmland," which form part of the open rural character valued in East Suffolk's countryside.¹²
- 6.9 Saxmundham Town Council therefore considers the proposed siting of the converter station to be in direct conflict with multiple objectives and policies of its adopted Neighbourhood Plan. Policy SAXS11 seeks to safeguard key landscape views and preserve the rural setting of the town – both of which would be severely affected by the scale, massing, and industrial character of the proposed development. More broadly, the scheme undermines the Neighbourhood Plan's core vision to maintain Saxmundham's distinct identity as a rural market town within a countryside setting. The imposition of large-scale energy infrastructure on elevated land to the east of the town would erode this identity, diminish local amenity, and compromise the Neighbourhood Plan's sustainable development objectives.
- 6.10 Saxmundham Town Council considers it wholly unacceptable that no finalised exterior design for either the converter station or the proposed access bridge has been submitted by the applicant at the pre-examination stage. This lack of detail prevents the local community and statutory consultees from fully assessing the visual, environmental, and heritage impacts of the development.

⁸ Ibid.

⁹ Ibid.

¹⁰ Sea Link – Consultation Report Appendix F Targeted Consultation Part 2 of 2a (APP-314)

¹¹ Sea Link – Outline Landscape and Ecological Management Plan – Suffolk (Application Document 7.5.7.1) (APP-348)

¹² Ibid.

- 6.11 The converter station site is also crossed by, or near, several public rights of way, including footpaths 491/006 and 460/023, which currently offer countryside walking routes connecting Saxmundham to Sternfield and Benhall. The industrialisation of these landscapes, both visually and audibly, will erode their appeal, reduce usage, and detract from East Suffolk's aspirations to support health and wellbeing through access to the natural environment.¹³
- 6.12 The cumulative impact of Sea Link and the likely future addition of National Grid Ventures' Lion Link, also proposed in the same location, raises further concern. If both converter stations proceed, Saxmundham would be encircled to the south and east by vast infrastructure, creating a 'wall of steel effect' and fundamentally changing the town's rural setting. The resulting visual degradation would be incompatible with the town's designation as a rural market town¹⁴ and undermine its appeal to visitors, residents, and businesses alike.
- 6.13 Saxmundham Town Council considers the proposed location is wholly inappropriate for industrial infrastructure of this scale. We call on the Examining Authority to give full weight to the irreversible and cumulative visual harm this proposal would cause to Saxmundham's rural character and to reject any proposal that fails to protect the distinctiveness of this valued landscape.
- 6.14 Saxmundham Town Council recommends that the applicant adopts enhanced measures to mitigate the visual impact of the converter station and associated infrastructure. In particular:
- 6.14.1 The applicant should excavate or partially recess the converter station into the landscape and consider adjusting its massing and form to reduce overall height and prominence. Bunding, even when combined with tree planting, will be insufficient on its own to screen the development effectively.
 - 6.14.2 The architectural design of the converter station should be sympathetic to the rural character of the area. Saxmundham Town Council supports the inclusion of the proposed green roof and recommends its incorporation into the final design to help the building blend into its surroundings.
 - 6.14.3 Additional natural screening should be provided through the planting of shrubs and copses of native trees around the converter station site. This will help to obscure its scale, preserve important views, and enhance local biodiversity. While some planting is proposed by the applicant,¹⁵ Saxmundham Town Council notes with concern that no early planting is planned to the north of the access bridge in the region of Wood Farm, nor on either side of the bridge where it traverses elevated farmland.
 - 6.14.4 The exterior of the converter station should be clad in materials with colours and textures that are sympathetic to the surrounding landscape to minimise visual intrusion.
- 6.15 In addition, Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to consider and present alternative access routes to the converter station site, such as via the new Sizewell Link Road, to mitigate harm to the rural landscape, local heritage assets, and the

¹³ SCLP8.2: Open Space, Play and Outdoor Recreation

¹⁴ SCLP12.28: Strategy for Saxmundham

¹⁵ Sea Link – Outline Landscape and Ecological Management Plan – Suffolk, 7.5.7.1 (APP-348)

surrounding environment.

7. Impact of Traffic and Traffic Management

- 7.1 Saxmundham Town Council strongly objects to the proposed siting of the Sea Link converter station due to inadequate road infrastructure, the inter-project cumulative impacts from multiple Nationally Significant Infrastructure Projects (NSIPs), and the implausibility of the proposed access route for Abnormal Indivisible Loads (AILs).

7.2

If consent for Sea Link is granted, Saxmundham will be effectively encircled by a ring of major development - a convergence of concurrent or sequential NSIPs alongside strategic industrial and housing growth. This concentration of development will place unprecedented and sustained pressure on the town's already limited road network. These include:

- 7.2.1 Sizewell C nuclear power station, approximately 6.5 miles east, with construction ongoing until the mid-2030s.
- 7.2.2 ScottishPower Renewables' EA1N and EA2 consented substation at Friston, approximately 4 miles southeast, with construction planned between 2025 and 2030.
- 7.2.3 The South Saxmundham Garden Neighbourhood, which is designated in East Suffolk Council's Local Plan, is set to deliver around 800 new homes to the south of the town and east of the A12, with an associated employment area to the west of the A12.
- 7.2.4 Carlton Park Industrial Estate extension in neighbouring Kelsale-cum-Carlton, currently in planning with eleven additional units proposed.

- 7.3 The local road network is fundamentally unsuitable to accommodate the volume, scale and frequency of HGV and AIL movements associated with these developments. Despite Sizewell C not yet reaching peak workforce levels, Saxmundham and the surrounding area already experience increased congestion. The A12, the only major arterial route, has limited capacity to absorb additional demand. Sea Link construction traffic will rely heavily on the B1122 and B1119 leading from the A12 - both narrow, rural roads that are ill-equipped for such sustained use.

- 7.4 The A12 is primarily single carriageway from south of Wickham Market northwards to Lowestoft. Whilst the A12 traffic around Saxmundham is forecasted during peak traffic periods for the Sea Link project to be within theoretical capacity, problems are envisaged further south.¹⁶ Traffic modelling shows that:

- 7.4.1 The A12 from the Wickham Market by-pass to Friday Street will exceed its theoretical capacity during the August peak.

¹⁶ Appendix 1 - Suffolk Heritage Coast Energy Projects, Traffic Impact Summary, 13/02/25, pp. 18-19

- 7.4.2 The A12 north of Woodbridge is forecast to operate above theoretical capacity before it transitions to dual carriageway.
- 7.5 Even where traffic volumes on the A12 are forecast to remain within theoretical capacity near Saxmundham, construction-related temporary works and traffic management interventions will disrupt flow. Within a 2-mile stretch of the A12, multiple overlapping roadworks are planned:
- 7.5.1 A1094/Friday Street - roundabout for Sizewell C - to end circa 2026.
- 7.5.2 A12 - temporary traffic management for EA1N and EA2 - 2025-2026.
- 7.5.3 A12/B1121 - junction works for Sea Link - from 2026.
- 7.5.4 A12 between B1121 and B1119 - roundabout and pedestrian crossing for the South Saxmundham Garden Neighbourhood - from 2026.
- 7.6 Further north, at Kelsale-cum-Carlton, the A12 will be realigned to accommodate the Sizewell Link Road, including a new roundabout anticipated around 2026-2027. While the Sea Link applicant suggests it will not overlap with other NSIPs, Saxmundham Town Council is concerned that schedule slippage, a common risk in major infrastructure delivery, could result in simultaneous, overlapping works and associated congestion.
- 7.7 Notably, every main junction serving Saxmundham is designated a primary access route for one or more NSIPs:
- 7.7.1 A12/A1094 Friston - EA1N and EA2
- 7.7.2 A12/B1121 Benhall - Sea Link
- 7.7.3 A12/B1122 Yoxford - Sizewell C
- 7.7.4 A12/North of Kelsale - Sizewell Link Road
- 7.8 Sea Link's preferred route for HGVs and AILs is via the A12 and B1121. However, the applicant has not proposed any enhancements for the dangerous A12/B1121 junction. This junction requires vehicles to enter a central refuge to turn right across oncoming traffic; a manoeuvre made riskier by increased volumes and slow-turning construction vehicles.
- 7.9 The B1121 railway bridge at Benhall is another key concern. A Suffolk County Council inspection resulted in a weight restriction of 46 tonnes.¹⁷ Accommodating AILs would necessitate constructing an overbridge or extensive reinforcement, potentially requiring temporary road and rail closures. These disruptions would not only affect residents and businesses but could compromise Sizewell C's freight rail logistics and escalate traffic pressure elsewhere.
- 7.10 Although the proposed Sea Link access road between Benhall and Saxmundham would relieve some pressure from the town centre, it would impose severe impacts on Benhall. This rural route is regularly used by pedestrians, cyclists, horse-riders and children walking to the local primary school. Increased traffic movements here pose clear safety and wellbeing concerns.

¹⁷ Sea Link – Consultation Report, Section 5.1.7, Part 2 of 2 (APP-314)

7.11 Saxmundham Town Council anticipates that traffic congestion and construction delays on the A12 will encourage 'rat-running' via unsuitable rural roads, especially:

7.11.1 Southbound: Sternfield, Snape, Tunstall, Eyke, Melton

7.11.2 Northbound: Kelsale, Carlton, Clay Hills to Leiston and Sizewell

Such diversions would increase accident risk, endanger vulnerable road users, and disrupt small communities unprepared for such traffic volumes.

7.12 Saxmundham Town Council respectfully requests the Examining Authority, in the event consent is recommended, to require the applicant to:

7.12.1 establish and operate a vehicle movement identification and compliance scheme (e.g. GPS tracking or permit-based system) to ensure all HGVs and LGVs strictly adhere to approved construction routes.

7.12.2 fund additional ambulance capacity, paramedics and community midwifery support to serve Saxmundham and the wider district, in coordination with the NHS. This should include either a dedicated local ambulance unit or support for enhanced coverage from nearby stations, to address the heightened risk of delays to emergency care caused by road congestion.

7.12.3 coordinate with Sizewell C Co to share its northern and southern Park and Ride facilities, thereby reducing the volume of construction workforce vehicles travelling into and through Saxmundham.

7.12.4 coordinate with Sizewell C Co to make use of the existing offsite freight management facility at Orwell Logistics Park to regulate HGV movements along the A12 corridor and avoid congestion hotspots.

7.13 The cumulative impact of construction traffic, workforce vehicles, and delivery movements associated with Sizewell C, EA1N, EA2, Sea Link, Lion Link, and the South Saxmundham Garden Neighbourhood would place the local road network under intolerable and unsustainable strain. The existing infrastructure is wholly inadequate to accommodate the scale and concurrency of these developments. This will lead, if implemented, to:

7.13.1 Long-term operational challenges for nationally critical energy infrastructure.

7.13.2 Severe disruption during construction, with reduced connectivity and economic resilience for Saxmundham.

7.13.3 Unacceptable risks to community safety, health and wellbeing.

7.14 The applicant proposes that, in the event of a closure of the B1121, a temporary diversion route would be implemented via the A12 to the B1119 at Rendham Road, continuing through to Mill Street and

Chantry Road.¹⁸ Saxmundham Town Council considers this diversion wholly inappropriate and unsafe due to the following reasons:

- 7.14.1 The route passes through densely populated residential areas.
 - 7.14.2 Roads and pavements are narrow and unsuitable for increased HGV volumes.
 - 7.14.3 The area includes a primary school, a nursing home and a facility for vulnerable adults.
 - 7.14.4 The former high school site is expected to accommodate SEND provision, increasing the presence of vulnerable children.
 - 7.14.5 The fire and ambulance stations are accessed from side streets leading to Rendham Road, creating potential delays to emergency response times.
 - 7.14.6 A level crossing on this route restricts traffic flows up to twice an hour.
 - 7.14.7 The route traverses a traffic-light-controlled junction that is already subject to congestion.
 - 7.14.8 Sections of the route fall within the town's Conservation Area, including Chantry Road with a 7.5-tonne weight restriction, raising concerns about the structural integrity of older properties.
 - 7.14.9 The increase in heavy traffic may deter residents and visitors from using the town centre, adversely affecting local businesses and economic vitality.
- 7.15 The applicant indicates that, in addition to the newly proposed access road from the B1121, access will be provided via an existing track leading to Wood Farm from the B1119.¹⁹ Saxmundham Town Council understands that to reach this route, construction HGVs will travel along the B1121, passing directly through the centre of Saxmundham, before ascending the B1119. The applicant estimates that approximately 3% of construction vehicles will use this route. We respectfully request that the Examining Authority seek clarification as to whether this 3% figure applies solely to early mobilisation works—and, if so, the anticipated duration of that phase—or whether it relates to the entire construction period, including peak traffic phases.
- 7.16 Saxmundham Town Council further requests that the Examining Authority clarify whether the applicant anticipates five²⁰ or ten²¹ HGVs using this route daily, as both figures appear in the documentation. Greater transparency is essential to properly assess the scale, frequency, and localised impacts of construction traffic on Saxmundham's road network and residential amenity.
- 7.17 Saxmundham Town Council objects to the proposal that Sea Link construction traffic be routed through the centre of the town. The town's existing infrastructure is wholly unsuited to accommodate this level of disruption, and the consequences for public safety, accessibility, and quality of life would

¹⁸ Sea Link – Rights of Way and Access Plans, Sheet 1 of 6 (APP-025)

¹⁹ Sea Link – Environmental Statement, Chapter 7, Part 2, 6.2.2.7 Traffic and Transport (APP-054)

²⁰ Sea Link – 5.17, Appendix F, Targeted Consultation, Part 2 of 2, pp. 145-152 (APP-314)

²¹ Ibid.

be significant. Specific concerns include:

- 7.17.1 Noise and disturbance to residential properties situated near main roads through the town, particularly along South Entrance, Church Street and the High Street.
 - 7.17.2 High pedestrian activity, including children and older residents, at the crossroads where compliance with signal-controlled crossings is inconsistent. The risk of accidents will rise significantly with additional traffic.
 - 7.17.3 Congestion on the High Street is regularly exacerbated by delivery vehicles and motorists stopping illegally, particularly shoppers with mobility issues. Increased HGV traffic will worsen safety risks and traffic flow.
 - 7.17.4 Sun glare during winter months can obscure driver visibility on key routes through the town, further increasing accident risk in the presence of larger vehicles.
 - 7.17.5 Church Street frequently experiences bottlenecks, with supermarket traffic, bus stops on both sides of the road, and a zebra crossing that is partially obscured by queuing vehicles.²²
 - 7.17.6 Unsafe pedestrian behaviour on Church Street, particularly by vulnerable pedestrians who do not always use the zebra crossing, is already a concern and would be exacerbated by additional traffic volumes.
 - 7.17.7 Lack of a footpath from Manor Gardens into the town centre means that pedestrians must cross Church Hill at an informal and already hazardous location. Increased traffic movements will make this route significantly more dangerous.
- 7.18 Saxmundham Town Council further objects to the proposal that Sea Link construction traffic be routed through the centre of town, due to the daily movements of school children, as follows:
- 7.18.1 School children congregate daily at the South Entrance traffic lights to board and alight from school buses, often during peak periods of proposed construction vehicle movements. This location is already busy at peak times and lacks sufficient space or infrastructure to safely accommodate high volumes of traffic alongside vulnerable road users.
 - 7.18.2 Saxmundham has only one primary school and no secondary school provision. As a result, all children above primary school age, and many younger pupils attending schools of choice, are required to travel by car or bus to access state education in neighbouring towns including Leiston, Framlingham, and Woodbridge. Post-16 students must travel further afield by road to Framlingham, Halesworth, Lowestoft, or Ipswich to attend sixth forms or colleges. In addition, all special educational needs and disabilities (SEND) provision currently requires road transport to specialist settings in Lowestoft or Ipswich, placing additional strain on transport infrastructure and increasing the frequency of journeys involving vulnerable children.

²² Appendix 2 – View of Church Street Traffic

7.18.3 This daily movement of pupils, many of whom rely on school buses or parental transport, already presents a significant traffic and safety consideration. The introduction of heavy construction traffic during peak travel times poses a serious risk to the wellbeing of school-age children and their families and must be factored into any construction and traffic management planning.

7.19 Saxmundham Town Council respectfully requests that, if, despite our objection, any construction traffic is permitted to enter the town, the Examining Authority requires the applicant to implement the following specific mitigation measures. Many of these recommendations were previously submitted by the Town Council during the applicant's statutory public consultation but, in our view, have not been adequately addressed:²³

7.19.1 All Sea Link construction traffic should be restricted from travelling through Saxmundham during peak shopping hours and weekday rush hours to reduce disruption and risk to residents.

7.19.2 The applicant must coordinate closely with Suffolk County Council to ensure traffic management measures do not conflict with other scheduled or ongoing roadworks.

7.19.3 The existing zebra crossing on Church Street should be upgraded to a signal-controlled pedestrian crossing to enhance safety in an area with high footfall and vehicle congestion.

7.19.4 A new zebra crossing should be installed at the top of Church Hill, opposite the bus shelter, to provide a safe route for pedestrians including students crossing the road to access school transport.

7.19.5 The applicant should develop and implement measures to discourage 'rat running' or informal diversions by construction traffic through unsuitable residential streets such as Rendham Road, Mill Road and Chantry Road.

7.19.6 No HGV deliveries should be permitted on Sundays or public holidays to reduce disruption and protect residents' amenity during rest days.

7.19.7 All HGV deliveries should be restricted to the hours between 08:00 and 22:00 to minimise noise impacts on residents, in line with existing planning restrictions in the area (such as those imposed on supermarket deliveries).

7.19.8 In conjunction with Suffolk County Council and Saxmundham Town Council, the applicant should fund a 20mph speed limit zone throughout key areas of the town to enhance pedestrian safety and discourage rat-running through residential streets.

7.20 Saxmundham Town Council has serious concerns regarding the robustness and validity of the applicant's traffic assessments, particularly in relation to baseline monitoring data. The applicant's assumptions are derived from highway monitoring conducted during January and February 2024 - periods that are typically among the quietest months for traffic movements in this area. By contrast,

²³ Sea Link - Environmental Statement, Chapter 5.1.6, Part 4 of 4 (APP-312)

traffic data collected by Sizewell C Co in October 2024 (excluding the static point on the A12 at Farnham) records generally higher volumes, which may already reflect increased activity from early works on Sizewell C. Saxmundham Town Council is therefore concerned that the applicant's traffic model underrepresents HGV movements and overall traffic volumes, potentially leading to a significant underestimation of baseline conditions projected for 2028. This discrepancy could compromise the accuracy of predicted impacts and the adequacy of proposed mitigation.²⁴

7.21 The choice of January and February for data collection fails to account for seasonal fluctuations. These months are characterised by low levels of tourism, agricultural, and construction activity. By contrast, August represents a peak period for holiday travel and concurrent agricultural activity, and infrastructure works, making it a more appropriate benchmark for assessing true cumulative impacts. Saxmundham Town Council notes that Sizewell C Co is currently undertaking an additional round of traffic monitoring. We respectfully request the Examining Authority to require the applicant either to conduct supplementary traffic monitoring during peak periods or to collaborate with Sizewell C Co to present a more accurate and representative dataset to inform the examination process.

7.22 Sea Link represents the third NSIP proposed within a six-mile radius, all of which rely on a rural road network that is already under considerable pressure. Several sections of the A12, particularly around Woodbridge, are already operating near capacity, raising concerns about their ability to accommodate additional traffic associated with multiple infrastructure projects. Notably, the applicant has not conducted traffic monitoring or included any assessment data for areas south of Farnham, including the Woodbridge corridor. Saxmundham Town Council considers this a significant omission, particularly given the following:

7.22.1 Existing evidence indicates that roads in and around Woodbridge are already subject to congestion and delay.

7.22.2 The applicant's own assessment confirms that the construction workforce will be drawn from within a 60-minute drive-time radius, meaning that a substantial proportion of workers will travel northbound along the A12, passing through Woodbridge and other constrained areas.

This lack of assessment fails to account for likely increases in daily commuter and freight traffic through an already stressed transport corridor and risks undermining the integrity of the applicant's overall traffic impact analysis.

7.23 Saxmundham Town Council notes with concern that the applicant's traffic collision data includes the COVID-19 period.²⁵ As a result, it does not reflect normal traffic conditions and is not a reliable basis for assessing existing or future road safety risks. Traffic volumes during the pandemic were significantly reduced due to national lockdowns and remote working arrangements, which resulted in an atypical decrease in collision rates. This omission is particularly significant given that both the A12/B1121 junction at Benhall and the B1119 route through Saxmundham are known accident hotspots. The B1121 junction requires vehicles turning across fast-moving dual carriageway traffic, presenting a serious hazard. Similarly, the B1119 passes through residential areas with limited pedestrian infrastructure, busy school and retail zones, and complex junctions - all of which increase

²⁴ Sea Link – Environmental Statement, Appendix 2.7.D (APP-125)

²⁵ Sea Link - Environmental Statement, Appendix 2.7.A (APP-125)

the risk of vehicular and pedestrian collisions.

- 7.24 Saxmundham Town Council respectfully requests the Examining Authority to consider the broader transport corridor, including the area around Woodbridge, when considering the cumulative impact of traffic generated by Sea Link and other NSIPs. The consequences for Saxmundham and district residents include:

- 7.24.1 Significant delays for people travelling to workplaces, schools, and further education institutions.
- 7.24.2 Disruption to those attending essential medical appointments, including at Ipswich Hospital and clinics in Woodbridge.
- 7.24.3 Increased response times for emergency services (ambulance, police, and fire), potentially endangering public safety.

These impacts will compound the cumulative strain on local infrastructure and require a more holistic assessment that reflects real-world usage across the wider travel network.

- 7.25 Saxmundham Town Council is concerned about the anticipated increase in traffic travelling from the A12 via the B1121 to Bigsby's Corner in Benhall, particularly considering associated highway works proposed in the area. These changes are likely to have a significant and detrimental effect on the daily lives of Benhall residents, many of whom regularly travel by car, bus, mobility aid, cycle, or on foot to Saxmundham for school, work, healthcare, and essential services. Specific concerns include:

- 7.25.1 Increased risks to the safety of pedestrians, cyclists, and horse-riders along rural routes not designed for high traffic volumes.
- 7.25.2 Greater danger for school children walking to and from local primary schools, including those from Saxmundham crossing into Benhall.
- 7.25.3 Delays to public transport services, which many residents rely upon for commuting and essential travel.
- 7.25.4 Disruption to residents' access to healthcare, retail, and other essential services in Saxmundham.
- 7.25.5 Obstruction and delay to emergency vehicles which depend on timely and reliable access routes.

- 7.26 Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to implement, as a minimum, the following mitigation measures to protect the safety and wellbeing of local communities:

- 7.26.1 Enhancement of footpaths, cycle paths, and bridleways to ensure safe and accessible routes for non-motorised users, particularly in areas experiencing increased construction traffic. This

could include specific support for the 3 Communities Link Project which aims to improve walking and cycling connectivity between Benhall and Sternfield, Saxmundham, and Kelsale-cum-Carlton.

7.26.2 Installation of traffic light-controlled pedestrian crossings at key junctions near Benhall Primary School to safeguard children and families navigating these routes during peak hours.

7.27 The A12/B1121 junction presents a significant safety concern, particularly in the context of increased traffic volumes associated with the Sea Link proposal. The A12 bypass has physically divided the village of Benhall, placing key community facilities, such as the church, on the opposite side of the dual carriageway from much of the residential area. As a result, residents are required to navigate this busy junction to attend services or access the churchyard, greatly heightening the risk of accidents. Saxmundham Town Council therefore considers that substantial safety upgrades to this junction are essential to mitigate the risk to pedestrians and road users.

7.28 While the proposed Sea Link access road may help mitigate the impact of HGV traffic entering Saxmundham, provided that strict and consistent traffic management is enforced, Saxmundham Town Council remains concerned that increased volumes of cars and light goods vehicles will continue to pass through the town. Drivers are likely to divert from the A12 to avoid congestion and take shorter routes, bypassing the designated haul roads associated with multiple NSIPs. The cumulative increase in traffic from Sea Link and other major developments is expected to negatively affect Saxmundham residents and businesses in the following ways:²⁶

7.28.1 Residents travelling south by bus or car to Woodbridge, Ipswich, and beyond for school, college, work, or medical appointments are likely to face significant delays.

7.28.2 Local businesses dependent on timely road transport may suffer economically due to increased journey times and disruption to supply chains.

7.28.3 Shops and visitor attractions in Saxmundham may experience a decline in footfall, as extended travel times and traffic congestion deter customers - potentially leading to business closures.

7.29 Saxmundham Town Council further notes the absence of adequate consideration of air quality impacts caused by construction-related HGVs and increased congestion. Stationery traffic at key junctions, traffic lights, and pedestrian crossings, especially in the town centre, will significantly elevate exposure to airborne pollutants. This poses health risks to residents and may deter visitors, thereby impacting local businesses. The Examining Authority is respectfully requested to ensure that the applicant's air pollution assessments reflect realistic, worst-case traffic modelling and that robust mitigation measures are secured.

7.30 The cumulative impact of increased traffic is not only likely to undermine the mental wellbeing of Saxmundham residents, through heightened stress, frustration, and disruption to daily life, but also raises serious concerns about public safety. The potential for delays on the A12, caused by the overlapping demands of multiple infrastructure projects, represents a critical risk to life. The nearest

²⁶ Sea Link – Environmental Statement: Volume 6.2.5.3, Part 5, Chapter 3 (APP-087); Volume 6.2.2.7, Part 2, Chapter 7 (APP-054); and Volume 6.2.2.10, Part 2, Chapter 10 (APP-057)

Accident and Emergency department is at Ipswich Hospital, more than 21 miles away. Any obstruction or congestion on this key route could hinder timely access to urgent medical care, increasing the likelihood of avoidable harm or even mortality. This issue does not affect Saxmundham alone but extends to neighbouring towns and villages such as Kelsale-cum-Carlton, Leiston, Aldeburgh, Benhall, Sternfield, and beyond.

- 7.31 Additionally, the B1121, B1119 and A12 form part of the designated emergency evacuation routes from the Sizewell B Nuclear Power Station. Any increase in traffic congestion or obstruction on these critical routes poses a significant risk to public safety in the event of an emergency.²⁷
- 7.32 Saxmundham Town Council considers the cumulative saturation of consented and proposed energy projects in this region to be unsustainable. We therefore strongly oppose the application for a Development Consent Order for Sea Link on the grounds that the existing road infrastructure is wholly inadequate to accommodate the associated traffic. The resulting congestion would severely undermine the socio-economic wellbeing of our town, impede timely access to emergency medical care, and significantly heighten the risk of road traffic accidents as drivers divert onto narrow, unsuitable rural routes to avoid delays.

8. Impact on Public Rights of Way

- 8.1 Saxmundham Town Council objects to the proposed temporary diversion route of Public Rights of Way 491/006 and 460/023, which currently provide safe and scenic walking routes between Saxmundham and neighbouring parishes. The proposed diversion runs adjacent to the heavily trafficked B1119, subjecting users to increased noise, air pollution, and a less attractive walking experience. It will also lengthen journey times and remove the tranquillity that is central to countryside access.²⁸
- 8.2 The proposed converter station site intersects a historic network of public footpaths that have long connected Saxmundham to Sternfield and the coast. Whilst, no longer used for livestock or goods transport to market, the paths form part of the area's rural heritage and continue to play a vital role in promoting physical activity, mental wellbeing and wildlife connectivity. Disrupting or downgrading access to these routes risks severing important recreational and ecological corridors and diminishing the quality of life for both residents and visitors.²⁹
- 8.3 Saxmundham Town Council respectfully requests that the Examining Authority requires the applicant to develop and consult on a new, safer and more appropriate diversion route for footpaths 491/006 and 460/023. This should be agreed in collaboration with Suffolk County Council, Saxmundham Town Council, and the affected neighbouring parishes of Benhall and Sternfield.
- 8.4 Saxmundham Town Council notes that the applicant has proposed a permissive path across the converter station site as partial mitigation for the permanent loss of access. However, this proposal is not guaranteed, and its status is uncertain.³⁰ Saxmundham Town Council requests clarification as to

²⁷ Sea Link – Consultation Report, Section 5.1.7, Part 2 of 2, pp. 154–155 (APP-314)

²⁸ Sea Link - Public Rights of Way Diversion Plans, Sheet 1 of 6 - 491/006 and 460/023 [APP-025]

²⁹ Sea Link – Public Rights of Way Diversions and Descriptions, including 491/006 and 460/023 adjacent to Wood Farm (APP-025)

³⁰ Sea Link - Outline Landscape and Ecological Management Plan 7.5.7.1 (APP-348)

whether this permissive path corresponds to the route illustrated in Figure 1 of APP-348. Furthermore, this figure assumes that the Lion Link converter station will not be built. If a second converter station is subsequently approved, the diverted footpaths would remain alongside the B1119 indefinitely, prolonging the loss of rural access and further exposing users to traffic-related impacts.

- 8.5 Saxmundham Town Council contends that the industrialisation of the area and the degradation of its rural views and tranquillity, will act as a deterrent to walkers, tourists and local users of the public rights of way network. While the applicant proposes landscape planting to mitigate the visual harm, it will take many years, potentially decades, before such measures reach maturity.³¹ In the intervening time, the visual and sensory experience of using these paths will be dominated by large-scale infrastructure, undermining the value of countryside access and the aspiration of East Suffolk Council's Local Plan to promote health, active lifestyles and sustainable tourism.³²

9. Noise and Other Disturbance

- 9.1 If construction compound S02,³³ located to the north-east of the proposed converter station site, is used as anticipated, it would place several residential properties in unacceptably close proximity to significant construction activity. Homes in Manor Gardens would be within 200-300 metres of the compound and approximately one-quarter of the properties in Prior's Grange would lie within a 500 metres radius³⁴. These residents would be subjected to sustained levels of noise, dust and light pollution throughout the construction period.
- 9.2 Construction activity at the compound is also likely to disrupt services and community events held at St John the Baptist Church, a prominent and active place of worship situated close to the construction site.
- 9.3 Residents of Sternfield and Hurts Hall will be impacted by elevated noise generated by site traffic, particularly given their location within 700 metres of the construction area. In particular, residents of Hurts Hall will be acutely affected by noise from vehicles accessing the site via the proposed new access road and bridge, which passes just 250 metres from the property.
- 9.4 Site traffic travelling uphill into Saxmundham will require the use of lower gears, significantly amplifying engine noise and vibration. This is especially problematic along Church Hill, where the gradient will cause additional acoustic disturbance. Saxmundham Town Council strongly recommends that this route is avoided for construction traffic in favour of alternatives that minimise residential impact.³⁵
- 9.5 Saxmundham Town Council objects to the applicant's proposal for extended working hours, including Sunday operations. Seven-day working - from 07:00 to 19:00 Monday to Friday, and 07:00 to 17:00 on Saturday and Sunday - would result in near-constant disruption for residents near the site.

³¹ Ibid.

³² SCLP8.2 and SCLP12.25 support countryside access and sustainable tourism.

³³ Sea Link - Environmental Statement, Volume 2, Chapter 2: The Proposed Development, paragraph 2.14.1. (APP-038)

³⁴ Measurements are approximate and based on the shortest straight-line distance between the edge of construction compound S02 and the nearest residential properties.

³⁵ Sea Link – Environmental Statement, Introduction of the Proposed Project, Figure 6.4.1.4.7 (APP-207)

- 9.6 The cumulative effects of construction noise, prolonged working hours, HGV movements, light pollution and airborne dust pose a serious risk to the physical and mental wellbeing of affected communities. In addition to Manor Gardens and Prior's Grange, residents of South Entrance, Church Street, and Church Hill would face significant disruption from site-related traffic. Properties on Church Hill are particularly vulnerable, as many front doors open directly onto a narrow pavement with no front garden or buffer zone between the home and the road, leaving residents exposed to noise, vibration, and reduced air quality at very close proximity³⁶
- 9.7 Saxmundham Town Council also opposes the siting of the converter station near residential areas due to serious concerns about ongoing operational noise, especially at night. We note that East Suffolk Council have not yet reached agreement with the applicant regarding acceptable noise thresholds.³⁷
- 9.8 In addition to concerns raised by East Suffolk Council, Saxmundham Town Council wishes to highlight the following:
- 9.8.1 The transformation of soft agricultural land into hard surfaces will alter the propagation of sound waves, increasing both the intensity and range of noise impacts on nearby homes and community assets.
- 9.8.2 The applicant's proposals do not adequately address the potential cumulative noise impact from future infrastructure, including the likely addition of a second converter station (Lion Link) on the same site.
- 9.8.3 Noise surveys submitted by the applicant do not identify specific human receptors such as residents of Manor Gardens and Prior's Grange, thereby underestimating the true extent of community impact.³⁸
- 9.9 In light of the above, Saxmundham Town Council respectfully requests the Examining Authority to give serious consideration to the following measures:
- 9.9.1 The converter station and all associated site compounds should be relocated further from residential areas to minimise direct disturbance.
- 9.9.2 Sunday working should be strictly prohibited. Weekday and Saturday working hours should be limited to 08:00 to 17:00, and noise mitigation measures such as acoustic screening, low-noise machinery and dust suppression systems should be mandatory.
- 9.9.3 All HGV movements must be confined to 08:00 to 17:00, Monday to Saturday, with strict enforcement mechanisms in place to prevent out-of-hours operations and associated disturbance.

³⁶ Sea Link – Environmental Statement, Traffic and Transport, Chapter 7 (APP-054) and Sea Link – Appendix F, Targeted Consultation, Part 2 of 2, pp. 153-154 (APP-314)

³⁷ Sea Link – Draft Statement of Common Ground, 7.4.8 (APP-329)

³⁸ Sea Link – Environment Statement, Appendix 2.9D, 6.3.2.9D, Suffolk Noise Survey Data (APP-138)

10. Socio-Economic, Recreation and Tourism Impact

- 10.1 Saxmundham Town Council strongly opposes the proposed siting of the Sea Link converter station, both during the construction phase and - more significantly - during its long-term operation. The applicant's justification for the environmental and economic impacts is narrowly focused. Its assessment emphasises temporary disruption to Public Rights of Way, suggests economic benefit through the potential employment of workers from within a 60-minute radius, and fails to account for any adverse effects on businesses located more than 500 metres outside the project's red line boundary. As a result, the vast majority of Saxmundham's businesses have been effectively excluded from consideration. Saxmundham Town Council considers this approach fundamentally flawed and unrepresentative of the true and lasting damage that would be inflicted on the town's economy, environment, and overall wellbeing if the Sea Link project is granted consent.³⁹
- 10.2 Saxmundham Town Council respectfully requests the Examining Authority to consider the following shortcomings in the applicant's assessment and approach:
- 10.2.1 The absence of any meaningful assessment of the impact that construction will have on local businesses, particularly in the town centre.
 - 10.2.2 The applicant's reliance on a 60-minute drive-time catchment to suggest employment benefits, which does not translate into any clear advantage for Saxmundham or its immediate surrounding parishes.
 - 10.2.3 The use of a 500-metre radius to assess construction impacts on businesses is wholly inadequate and excludes the majority of Saxmundham's commercial areas.
 - 10.2.4 There is no evidence of any planned or proposed measures to support or safeguard local businesses during the construction or operational phases.
 - 10.2.5 The applicant provides no indication of how the development will contribute to the health, social, or cultural wellbeing of the community. On the contrary, it is explicitly stated that no mitigation in these areas is proposed.
- 10.3 During the construction phase, particularly considering the cumulative impact of multiple major developments, Saxmundham Town Council is concerned that the following consequences will arise:⁴⁰
- 10.3.1 Increased traffic congestion and disruptive construction activity will deter tourists from visiting the area.
 - 10.3.2 Shoppers may avoid the town due to congestion and restricted access, negatively affecting high street footfall and retail trade.

³⁹ Sea Link - Environmental Statement: Volume 6, Document 6.2.2.10 Part 2 – Suffolk Chapter 10: Socio-economics, Recreation and Tourism (APP-057)

⁴⁰ Sea Link - Environmental Statement Volume 5, Chapter 3: Health and Wellbeing, 6.2.5.3, Part 5, Chapter 3 (APP-087)

- 10.3.3 The demand for temporary lodgings for construction workers will drive up holiday accommodation prices, discouraging tourists and resulting in lost revenue for visitor attractions and hospitality businesses.
 - 10.3.4 The influx of workers could inflate rental costs, making properties unaffordable for residents and potentially forcing long-term tenants to relocate.
 - 10.3.5 Prospective homebuyers may be dissuaded from purchasing properties in the town during the extended period of disruption.
 - 10.3.6 The combined effects of reduced consumer activity, escalating housing costs, and disrupted town centre access, risks triggering a broader economic downturn, from which Saxmundham may take years to recover.
- 10.4 While effective mitigation can reduce the direct impacts of construction, without meaningful investment in the host community, where infrastructure is being imposed in the name of the 'common good', residents will inevitably bear the burden. Although the applicant refers to community benefits, they have, to date, failed to engage substantively with the community or demonstrate a commitment to delivering tangible, locally driven outcomes.

11. Intra-Project Cumulative Effects

- 11.1 As part of its application for a Development Consent Order, the applicant is required to assess intra-project cumulative effects - that is, the combined impact of multiple individual elements of the Sea Link project (e.g. construction noise, loss of public rights of way, air pollution, and visual intrusion) on human receptors, particularly where these impacts overlap spatially and temporally.
- 11.2 Saxmundham Town Council contends that the applicant's Environmental Statement underrepresents the full range and severity of these cumulative impacts on the town's residents, visitors, and local infrastructure. While individual impacts such as visual blight, construction dust, or traffic-related noise may be considered manageable in isolation, their simultaneous occurrence over an extended period has the potential to create significant, sustained, and harmful effects on quality of life, physical and mental health, and community wellbeing.
- 11.3 This section sets out Saxmundham Town Council's concerns regarding these intra-project cumulative effects, which we believe must be given greater weight by the Examining Authority. The analysis is grouped by theme - health and wellbeing, air quality, noise and vibration, and socio-economic impacts - each of which reflects the lived experience of human receptors located near the proposed converter station, construction compounds, access roads, and associated infrastructure.
- 11.4 Effects of Health and Wellbeing - Saxmundham Town Council is seriously concerned about the cumulative effects of the Sea Link project on the physical and mental health of human receptors living near the proposed converter station, construction compounds, and access roads. These include:⁴¹

⁴¹ Environmental Statement, Summary of Likely Effects, 6.2.5.3, part 5, Chapter 3, (APP-087) and Traffic and Transport, 6.2.2.7, Chapter 7, (APP-054).

- 11.4.1 Loss of landscape character and visual amenity, contributing to stress, reduced quality of life, and feelings of enclosure.
- 11.4.2 Continuous exposure to noise, dust, and light pollution over an extended period.
- 11.4.3 Disruption caused by prolonged and unsocial construction working hours.
- 11.4.4 Loss of access to public rights of way, limiting opportunities for outdoor recreation and social interaction essential to wellbeing.
- 11.5 Effects on Air Quality - Saxmundham Town Council highlights the significant potential for cumulative air quality impacts, particularly in areas close to site access points, construction compounds, and vehicle routes.⁴² Specific concerns include:
 - 11.5.1 General deterioration of local air quality due to concentrated and prolonged construction activity.
 - 11.5.2 Exposure to diesel emissions from HGVs, construction machinery, and generators.
 - 11.5.3 Increased health risks for vulnerable groups, particularly children, the elderly, and individuals with pre-existing respiratory conditions such as asthma or COPD.⁴³
- 11.6 Noise and Vibration Impacts - In addition to operational noise from the converter station, residents will be exposed to multiple overlapping noise and vibration sources during the construction phase. These include:
 - 11.6.1 Elevated traffic volumes on the B1121, B1119, and A12, causing road noise and delays.⁴⁴
 - 11.6.2 Constant noise from construction vehicles, especially properties near compound S02, including high-frequency reversing alarms and low-frequency engine idling.⁴⁵
 - 11.6.3 Ground vibration from plant movement, excavation, and soil compaction, with the potential to disturb residents and affect nearby buildings.⁴⁶
- 11.7 Socio-Economic Effects - The project also risks cumulative negative impacts on Saxmundham's local economy and community fabric, particularly during the lengthy construction period. Concerns include:

⁴² Sea Link – Environmental Statement Volume 6.2.5.3 Part 5 Combined Chapter 3: Summary of Likely Significant Effects (APP-087) and Sea Link – Environmental Statement Volume 6.2.2.7 Part 2 Suffolk Chapter 7: Traffic and Transport (APP-054)

⁴³ Sea Link – Environmental Statement Volume 6.2.2.8 Part 2 Suffolk Chapter 8: Air Quality (APP-055), Sea Link – Environmental Statement Volume 6.2.2.11 Part 2 Suffolk Chapter 11: Health and Wellbeing (APP-058) and Environmental Statement Volume 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-Economics, Recreation and Tourism (APP-057)

⁴⁴ Outline Construction Traffic Management and Travel Plan, 7.5.11 (APP-337)

⁴⁵ Sea Link – Environmental Statement Volume 6.2.2.9 Part 2 Suffolk Chapter 9: Noise and Vibration (APP-056) and Indicative General Arrangement Plans, 2.1.4.1. (APP-038)

⁴⁶ Indicative General Arrangement Plans, 2.14.1, (APP-038); Sea Link – Environmental Statement Volume 6.2.2.9 Part 2 Suffolk Chapter 9: Noise and Vibration (APP-056)

- 11.7.1 Increased use of already busy supermarkets and other facilities by construction workers, contributing to congestion in car parks, surrounding roads, and within the shops themselves.
- 11.7.2 Potential rise in anti-social behaviour associated with a transient workforce.
- 11.7.3 Displacement of regular customers from local shops and supermarkets, leading to a possible decline in footfall for High Street businesses that rely on linked trips.⁴⁷

12. Water Resource Management and Flood Risk

- 12.1 East Anglia is among the driest regions in the country, and Saxmundham Town Council is concerned about the adequacy of water resources to support the Sea Link project. We respectfully request the Examining Authority to require the applicant to:
 - 12.1.1 Specify the source(s) of all water to be used during construction and operation.
 - 12.1.2 Confirm that proposed abstraction rates are agreed with the Environment Agency.
 - 12.1.3 Clarify whether the Environment Agency retains the right to suspend or revoke abstraction licences during drought conditions.
 - 12.1.4 Detail contingency plans or alternative water sources to ensure continuity of operations during periods of water scarcity.
 - 12.1.5 Confirm the availability of water supplies for firefighting and the operation of cooling systems throughout all project phases.
- 12.2 The proposed converter station site, situated on deep clay over a sand and shingle base, presents significant drainage challenges. Saxmundham Town Council is concerned about:⁴⁸
 - 12.2.1 The management of stormwater during construction and operation.
 - 12.2.2 Effective flood mitigation strategies to prevent localised flooding.
 - 12.2.3 The risk of surface water runoff from new hardstanding areas leading to flooding of adjacent land and public highways.
 - 12.2.4 Preventing contaminated surface water runoff during construction from entering nearby watercourses, which could threaten aquatic ecosystems.

⁴⁷ Indicative General Arrangement Plans, 2.14.1, (APP-038); Sea Link – Environmental Statement Volume 6.2.2.9 Part 2 Suffolk Chapter 9: Noise and Vibration (APP-056)

⁴⁸ Sea Link - Environmental Statement Volume 2, Chapter 4: Site Selection and Consideration of Alternatives, 6.2.2.4, Part 2, Chapter 4 (APP-051) and Environmental Statement, Volume 6, Part 2, Chapter 5: Geology and Hydrogeology (APP-052)

- 12.2.5 Safeguarding groundwater recharge rates to ensure they do not negatively impact local flora and fauna, particularly during drought conditions when ecosystems are most vulnerable.
- 12.3 Saxmundham Town Council respectfully requests that the Examining Authority require the applicant to publish a comprehensive Water Management Plan as part of the Construction Environmental Management Plan (CEMP), covering the full life of the facility. This should include:
- 12.3.1 Effective management of surface water runoff and protection of water quality during both the construction and operational phases.
- 12.3.2 Regular maintenance of attenuation ponds to prevent surface water flooding and uncontrolled runoff into the River Fromus.
- 12.3.3 A schedule for the routine inspection and clearance of debris from the proposed access road bridge to ensure it does not obstruct the natural flow of the River Fromus, thereby mitigating the risk of upstream flooding.
- 12.3.4 A continuous water quality monitoring regime to ensure that runoff and site discharges do not degrade local watercourses or groundwater resources.
- 12.4 The applicant has not submitted the final design for the proposed access road bridge over the River Fromus. Saxmundham Town Council wishes to raise the following concerns that:
- 12.4.1 The bridge may act as a physical barrier across the River Fromus, which may impede natural water flow and create a damming effect.
- 12.4.2 Associated earthworks could lead to surface water runoff entering nearby watercourses, increasing the risk of upstream flooding.
- 12.4.3 Altered hydrological patterns caused by the bridge's construction and operation could result in downstream flooding in Benhall.
- 12.5 In addition, Saxmundham Town Council respectfully requests that the Examining Authority confirm the proposed discharge location(s) for surface water runoff and clarify whether the applicant has undertaken modelling to assess the impact of this discharge on existing drainage infrastructure and receiving watercourses.
- 12.6 Saxmundham Town Council is concerned about the adverse effects of the Sea Link development on geology, hydrogeology, the water environment, and local ecology, particularly where changes to groundwater levels may impact both human receptors and wildlife.⁴⁹ Potential impacts include:

⁴⁹ Sea Link - Environmental Statement, Volume 6, Chapter 5: Geology and Hydrogeology, 6.2.2.5 Part 2, (APP-052) and Sea Link Environmental Statement, Volume 6, Chapter 4: Water Environment, 6.2.2.4 Part 2 (APP-051) and Sea Link Environmental Statement, Volume 6, Chapter 3: Summary of Likely Significant Effects, 6.2.5.3 Part 5 (APP-087)

- 12.6.1 Dehydration and degradation of local flora due to altered water tables or prolonged dry conditions.
 - 12.6.2 Increased surface water runoff from impermeable areas leading to soil erosion and disruption of natural watercourses.
 - 12.6.3 Construction-phase runoff contaminating and degrading wildlife habitats and natural ecosystems.
 - 12.6.4 Additional pressure on the existing stormwater drainage system, increasing the risk of surface flooding and local infrastructure stress.
- 12.7 Saxmundham Town Council considers that tanker-based dust suppression is insufficient, especially during dry and windy conditions, leading to poor air quality and associated health impacts. Robust contingency plans are therefore essential to ensure consistent dust control in dry conditions. We respectfully request the Examining Authority to require the applicant to:
- 12.7.1 Implement a fixed sprinkler system to deliver continuous and targeted water application to access roads.
 - 12.7.2 Assess and manage the risk of surface water runoff from such systems to prevent pollution of adjacent land, watercourses, and existing drainage infrastructure.

13. Ecology and Biodiversity Impacts

- 13.1 Saxmundham Town Council's Wildlife, Biodiversity and Environmental Policy recognises the leadership role we play in fostering a sustainable environment where biodiversity can thrive. The Town Council acknowledges its current and future responsibilities not only to conserve and promote local biodiversity, but also to take positive, proactive action, through sensitive management of open spaces, verges, and natural habitats, to support Suffolk County Council's 'Local Nature Recovery Strategy' and broader national objectives for ecological resilience.
- 13.2 Saxmundham Town Council does not suggest that the area surrounding the town ranks as one of the most environmentally sensitive in the UK. However, as a predominantly rural location, it supports a rich diversity of flora and fauna that warrants careful protection. The proposed converter station will result in the permanent loss of productive farmland, the destruction of habitats, and long-term disturbance to the ecological balance; not only during construction, but again during eventual decommissioning.⁵⁰
- 13.3 Saxmundham Town Council objects to the applicant's proposal to remove existing hedgerows and replace them with camouflaged Heras fencing as a form of temporary screening.⁵¹ This approach is wholly inadequate and cannot be considered a meaningful substitute for the ecological, landscape,

⁵⁰ Sea Link - Environmental Statement, Chapter 2, Ecology and Biodiversity, 6.2.2.2, (APP-049); Chapter 6: Agriculture and Soils, 6.2.2.6, (APP-053).

⁵¹ Sea Link - 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity and Application Document 6.2.3.2, Document 7.5.3.1 Register of Environmental Actions and Commitments (REAC)

and amenity value of established hedgerows. Hedgerows are recognised as Priority Habitats under the Suffolk Biodiversity Action Plan⁵² due to their vital role in supporting biodiversity, providing wildlife corridors, and enhancing ecosystem resilience. The use of camouflaged fencing does not replicate the biodiversity, habitat connectivity, or visual integration that native hedgerows provide. It is not an appropriate form of ‘dead hedging’ and falls short of acceptable mitigation. The Examining Authority is respectfully requested to require the applicant to retain existing hedgerows wherever possible and, where removal is unavoidable, to provide ecologically beneficial and visually sympathetic alternatives that contribute positively to the local landscape character.

- 13.4 Suffolk is among the driest regions in the UK, and dust pollution will present a significant challenge throughout the construction period. Dust can severely damage vegetation by coating plant surfaces and inhibiting photosynthesis, leading to long-term ecological degradation. Saxmundham Town Council notes that this issue extends beyond the designated Sandlings SPA and SSSI sites and could affect the entire 50-metre margin zone across the Sea Link development area during both construction and decommissioning phases.⁵³
- 13.5 Saxmundham Town Council respectfully requests the Examining Authority to consider the cumulative ecological impacts arising from the concurrent development of the Sea Link converter station and the South Saxmundham Garden Neighbourhood. The prospect of sustained construction activity on both the eastern and western edges of the town present a significant threat to wildlife and their habitats, resulting in fragmentation, displacement, and long-term ecological degradation.
- 13.6 Additionally, Saxmundham Town Council requests that the Examining Authority consider the following specific impacts during both the construction and decommissioning phases:⁵⁴
- 13.6.1 Permanent loss of habitat will disrupt bird breeding cycles due to the destruction of nesting and feeding grounds.
- 13.6.2 Disturbance to ground-nesting birds from vehicle movements, noise, and human activity.
- 13.6.3 Residual ground heat from buried cables may alter soil conditions, with detrimental effects on agricultural productivity and surrounding ecological systems.
- 13.7 Saxmundham Town Council acknowledges the applicant’s physical survey of the River Fromus and concurs with the Environment Agency’s classification of the river as a salmonid watercourse, which is highly sensitive to gravel disturbance and serves as a critical migratory route for the European Eel. In addition, Saxmundham Blue Spaces, a community-led voluntary group supported by the Town Council, has observed a range of wildlife in and around the river. Although the group has not formally identified fish species, numerous sightings have been reported, alongside frequent observations of grass snakes and common frogs. A resident population of kingfishers is also regularly seen along the river corridor. These species may not have been recorded by the applicant due to the limited temporal scope of their survey or its spatial restriction to within just two metres of the riverbank.⁵⁵

⁵² Suffolk Biodiversity Information Centre

⁵³ Sea Link - Environmental Statement: Combined Chapter 3 – Summary of Likely Significant Effects, Volume 6.2.5.3, Part 5. (APP-087)

⁵⁴ Ibid.

⁵⁵ Sea Link - Environmental Statement: Appendix 2.2.F – Aquatic Ecology Survey Report, Volume 6.3.2.2.F. (APP-104)

- 13.8 Saxmundham Town Council expresses concern regarding the applicant's reliance on the District Licensing Scheme for great crested newt mitigation. Local community group, Saxmundham Blue Spaces, has observed evidence of great crested newts within the vicinity of the River Fromus in Saxmundham. Accordingly, we request that the Examining Authority exhort the applicant to provide appropriate compensatory habitat within walking distance of this stretch of the river, to ensure that local populations are protected and ecological connectivity is maintained.
- 13.9 Saxmundham Town Council asserts that the construction of the proposed converter station will result in the displacement of local fauna and significant disruption to both territorial and migratory species. The applicant has not proposed adequate mitigation for the following wildlife known to inhabit the area:
- 13.9.1 Grass snakes, common frogs, and the broader ecosystem that supports regular sightings of kingfishers along the River Fromus.
- 13.9.2 Great crested newts, which have been recorded locally by community conservation groups in Saxmundham.
- 13.9.3 Brown hares, a priority species in Suffolk.
- 13.9.4 Multiple species of deer, whose established movement corridors would be interrupted.
- Saxmundham Town Council respectfully requests the Examining Authority to ensure that the applicant fully assesses these impacts and provides meaningful ecological mitigation and habitat connectivity measures.
- 13.10 Saxmundham Town Council respectfully requests that the Examining Authority require the applicant to appoint a resident ecologist to be present on site throughout the construction phase. The ecologist should be responsible for conducting daily inspections of habitats prior to the commencement of any works, to ensure protected species are not harmed and sensitive habitats are not disturbed or destroyed. This is essential to safeguard local biodiversity and uphold ecological best practice.

14. Reputational Damage

- 14.1 Saxmundham, commensurate with so many small towns, is fighting to maintain a vibrant town centre and is constantly trying to reinforce community spirit and identity. However, the proposed converter stations, even before development consent is considered, are leading to Saxmundham's reputation as an historic Suffolk market town coming under serious threat.
- 14.2 If the Sea Link proposals proceed, Saxmundham risks becoming nationally known not for its character, history or location, but as the centre of a vast electricity infrastructure hub: the 'Gateway to the Electricity Coast'.
- 14.3 Unlike nearby towns such as Woodbridge, Aldeburgh or Southwold, Saxmundham's image is less firmly established and more vulnerable to negative transformation. Its identity is fragile, and this development threatens to overwhelm the town's character and appeal. The scale and siting of the

converter stations would permanently and detrimentally alter how the town is perceived, deterring residents, businesses, and visitors alike.

- 14.4 Saxmundham Town Council questions the rationale behind selecting this location for the Sea Link converter station. Whilst it is situated close to the consented ScottishPower Renewables substation in the neighbouring parish of Friston, the proposed development would impose yet another substantial onshore energy infrastructure on a small geographical area. The resulting impact would blight not just one, but four rural and historic settlements - Friston, Benhall, Sternfield and Saxmundham - for generations to come.
- 14.5 The proposed Sea Link site sits between Saxmundham and Sternfield, a small historic hamlet to the south. All construction traffic will pass through Benhall, a village already fragmented by the A12 bypass. The cumulative effects of noise, disruption, and visual intrusion will profoundly affect not only Saxmundham, but also its close-knit neighbouring communities of Sternfield and Benhall.

15. Lack of Local Economic Benefit

- 15.1 The short-sighted approach to site selection for electricity transmission infrastructure will lead to the erosion of rural character, tranquillity, biodiversity and productive agricultural land, causing long-lasting reputational harm to an area renowned for its natural beauty and heritage. The overconcentration of energy infrastructure in this part of Suffolk directly contradicts the advice of planning experts such as Dr Andy Tickle,⁵⁶ who has warned against energy 'cluster points' for grid extensions citing that greater societal acceptance would be gained if numerous electrical infrastructures were not located in single locations.⁵⁷
- 15.2 Whereas industrialisation in previous eras often brought jobs and prosperity, Saxmundham stands to gain none of these economic benefits. Instead, our town faces a fundamental, externally imposed overturning of its character, heritage and identity.
- 15.3 In addition, Saxmundham Town Council is concerned that there is no assessment of the impact to local businesses caused by construction of the Sea Link converter station. Similarly, there is no acknowledgement of the detrimental effects on Saxmundham businesses for hosting electrical infrastructure during the operational stage.
- 15.4 Crucially, this large-scale industrialisation brings virtually no long-term employment or economic benefit to the local population. For some residents, particularly those already vulnerable, the cumulative impacts of successive major infrastructure projects risk exacerbating rural poverty and deepening social inequality across the region.

16. Housing Pressure, Displacement and Rural Inequality

⁵⁶ Dr. Andy Tickle, *Greening the Great Grid Upgrade*, commissioned by CPRE Essex, CPRE Norfolk, and the Suffolk Preservation Society, May 2024

⁵⁷ Ibid.

- 16.1 Saxmundham, like many rural communities in Suffolk, faces significant challenges related to poverty and deprivation. While Suffolk generally reports lower poverty rates compared to some regions, residents often grapple with lower-than-average incomes and higher housing costs.
- 16.2 The 2022 report 'Tackling Poverty in Suffolk' by Suffolk County Council highlighted that 17.77% of the county's population - approximately 135,314 individuals - live in poverty.⁵⁸ Notably, gross pay in Suffolk is £40 less per week than the national average, and housing affordability remains a pressing issue, particularly for those in the lowest 25% income bracket.
- 16.3 In the Aldeburgh, Leiston, and Saxmundham area, 10.9% of residents experience income deprivation, slightly above the Suffolk average of 10.0%. Additionally, 15.3% of children in this area are affected by income deprivation, compared to the county average of 13.7%. These statistics underscore the financial hardships faced by many local families.
- 16.4 Saxmundham Town Council is increasingly concerned about the cumulative impact of multiple NSIPs - particularly Sizewell C, EA1N, EA2, and now Sea Link—on the local housing market. The influx of contractors is intensifying demand for affordable rental housing, driving up costs, and displacing vulnerable groups such as retirees, single parents, individuals with disabilities, and low-income workers.⁵⁹ Without targeted mitigation, these pressures will deepen rural poverty and risk forcing long-standing residents to relocate, undermining community cohesion.
- 16.5 The introduction of additional infrastructure projects is likely to intensify existing housing pressure. Travelling contractors already compete for limited accommodation, pushing residents out of the area in search of affordability. Saxmundham could witness a diaspora of residents, disrupt community cohesion and increase commuting distances for those maintaining employment or school placements in town. In some cases, holiday accommodation is being repurposed for workers, potentially reducing tourism-related footfall and negatively impacting local businesses.⁶⁰
- 16.6 Whilst the applicant assumes that most contractors will travel daily within a 60-mile radius - all forms of skilled and unskilled construction labour are scarce in the area due to the demands of Sizewell C. It is likely that there will be insufficient local labour available, and that most workers will travel from further afield and require lodgings as close as possible to site. Furthermore, the applicant's assumptions for temporary accommodation are based on data from 2022⁶¹ and 2023⁶² - neither of which accounts for the overlapping demand generated by Sizewell C.⁶³

17. Security Vulnerability

- 17.1 Saxmundham Town Council is concerned about the security implications of hosting electricity infrastructure in our community. Concentrating many electricity generation and transmission assets

⁵⁸ Suffolk County Council, *Tackling Poverty in Suffolk*, 2022

⁵⁹ "£3,000 rents cause fears for people living near Sizewell," BBC News, 22 March 2025

⁶⁰ Sea Link - Environmental Statement: Volume 6, Document 6.2.2.10 Part 2 – Suffolk Chapter 10: Socio-economics, Recreation and Tourism, pp. 42–44 (APP-057)

⁶¹ Office for National Statistics. (April 2025). *Private Rental Market Summary Statistics in England: April 2025*.

⁶² Visit England. (2023). *Annual Survey of Visits to Visitor Attractions: 2022 Results*

⁶³ Sea Link - Environmental Statement: Volume 6, Document 6.2.2.10 Part 2 – Suffolk Chapter 10: Socio-economics, Recreation and Tourism, p. 42 (APP-057)

within one small geographic area, particularly where up to 30% of the UK's energy is forecasted to pass through East Suffolk, raises significant and unresolved security concerns.

- 17.2 In the event of a deliberate attack, such as the detonation of an explosive device delivered via drone, the consequences could be catastrophic. Emerging global security analyses highlight the increasing use of drones to target power infrastructure. A drone carrying an explosive could create a blast radius of up to 1.9 kilometres, depending on payload and design. If such an attack were to occur at the proposed Sea Link converter station, the resulting damage could extend well beyond the site itself, posing grave risks to life, property, and public safety in the nearby residential settlements. Saxmundham Town Council finds no evidence that the applicant has assessed this scale of impact or presented any credible mitigation for such a scenario.
- 17.3 The recent catastrophic fire at the North Hyde Substation in Hayes which led to a complete shutdown of Heathrow Airport in March 2025 provides a stark warning. The government deemed the incident serious enough to warrant investigation by SO15 Counter Terrorism Command,⁶⁴ highlighting the acknowledged risk that such critical infrastructure may be targeted by hostile actors. Unlike North Hyde, which benefits from robust emergency services, including the rapid deployment of up to seventy-five firefighters, East Suffolk is far less equipped. Saxmundham relies on retained (volunteer) fire crews, with the nearest full-time firefighting resources located in Ipswich, some 18-20 miles away.
- 17.4 The risk of wildfires in Suffolk is notably heightened during periods of summer drought. Suffolk's predominantly rural landscape, comprising agricultural land, heathland, and forests, presents a high risk of wildfires during prolonged hot, dry summer months. In 2022, Suffolk Fire and Rescue Service responded to over 500 fires in open areas such as woodlands, heaths, and farmlands during July and August alone, a significant increase from approximately 100 incidents in the same period the previous year.⁶⁵ This surge in wildfire activity was attributed to extreme temperatures and dry conditions, leading the service to declare a major incident for the first time in decades in 2022. Such incidents not only endanger human life but also devastate wildlife habitats and cause property damage. The combination of these factors underscores the vulnerability of the region to wildfires during drought conditions.
- 17.5 Policing provision is similarly limited; Saxmundham has no permanent police presence, with officers travelling from Halesworth (12 miles) or Martlesham (15 miles). To place a concentration of nationally critical energy assets in an area with limited emergency and security infrastructure represents a high and unjustified risk to both national and regional security. It should also be noted that the Civil Nuclear Constabulary is solely responsible for the security of nuclear power stations and offers no protection for other forms of critical energy infrastructure, such as the proposed Sea Link site. This issue has not been addressed by the applicant.
- 17.6 Saxmundham Town Council respectfully requests that the Examining Authority requires the applicant to fully assess and address the security vulnerabilities associated with the converter station and related infrastructure. We ask that the applicant provides a clear and detailed explanation of the measures proposed to mitigate these risks, including physical, cyber, and operational security provisions.

⁶⁴ The Daily Telegraph, 21 March 2025

⁶⁵ Shotley Peninsula Nub News, 5 June 2023

18. Cumulative Impact

- 18.1 While outside the formal remit of the Sea Link examination, Saxmundham Town Council is deeply concerned about the cumulative burden being placed on our town and surrounding parishes by multiple NSIPs. While each scheme may be presented and examined in isolation, their combined impact on the local landscape, population, and infrastructure is both significant and unsustainable.
- 18.2 The Sea Link project is only one of several major developments proposed for this area. Saxmundham lies near the onshore substation complex at Friston for the EA1N and EA2 offshore windfarm projects. These substations, already approved despite strong local opposition, have introduced permanent industrial infrastructure into the countryside and are expected to bring long-term noise, visual, and environmental impacts. Their construction is yet to begin, meaning there will be significant temporal overlap with Sea Link.
- 18.3 In addition, National Grid Ventures is advancing proposals for a second high-voltage interconnector - Lion Link - which, if consented, could result in the construction of another converter station adjacent to the Sea Link site. This would double the scale of industrialisation around Saxmundham, locking the town into a prolonged phase of development, traffic disruption, and loss of amenity.
- 18.4 This is in parallel with the Sizewell C nuclear power station development, which will bring thousands of HGVs, A12 upgrades, and worker accommodation pressures across East Suffolk, including in Saxmundham. The cumulative traffic, noise, air quality, housing, and public service pressures have not been fully assessed in relation to Sea Link.
- 18.5 At present, there is no joined-up strategy that addresses the combined effects of EA1N, EA2, Sea Link, Lion Link, and Sizewell C, all of which intersect in this part of Suffolk. Saxmundham is being disproportionately burdened with infrastructure projects of national scale, without a corresponding benefit to the community or meaningful engagement in spatial planning decisions.
- 18.6 In addition to the physical and environmental impacts, the cumulative burden on affected communities from overlapping statutory consultations and examinations is considerable. Saxmundham residents, councillors and officers, and community groups have had to engage with multiple complex and technical NSIPs, each requiring detailed scrutiny within strict timeframes. This repeated demand for input, with little evidence that community concerns materially influence outcomes, contributes to growing fatigue, disillusionment, and disengagement. The public's capacity to participate meaningfully is being stretched beyond what is reasonable or fair, particularly in small towns with limited administrative resources. This undermines the integrity of the consultation process and calls into question the democratic legitimacy of such decision-making.
- 18.7 Saxmundham Town Council respectfully requests the Examining Authority to consider the Sea Link proposal within the wider infrastructure context and require a full and transparent cumulative impact assessment. The town cannot continue to absorb such large-scale development without permanent damage to its character, wellbeing, and future resilience.

19. Re-evaluation of Saxmundham as the Preferred Location

- 19.1 Saxmundham Town Council respectfully submits that the selection of the proposed converter station site near Saxmundham is no longer justified considering recent developments, particularly the confirmed relocation of the Nautilus interconnector to the Isle of Grain in Kent. This significant change reduces the cumulative infrastructure burden initially anticipated for the Saxmundham area and necessitates a re-evaluation of the necessity and appropriateness of the current site selection.
- 19.2 Originally, the Saxmundham site was considered suitable due to plans to co-locate multiple converter stations, including those for Sea Link, Lion Link, and Nautilus, thereby optimising land use and minimising environmental impact. However, with Nautilus now set to connect at the Isle of Grain, the rationale for concentrating such substantial infrastructure near Saxmundham has weakened. This shift presents an opportunity to reconsider the location of the Sea Link converter station, potentially favouring sites closer to demand centres or existing industrial zones, which could offer better alignment with strategic energy distribution goals and reduce the environmental footprint on rural Suffolk.
- 19.3 Furthermore, the cumulative impact of multiple large-scale energy projects on the Saxmundham area has been a point of concern for local authorities and residents. The removal of Nautilus from this cluster alleviates some pressure but also underscores the need to reassess the remaining infrastructure plans to ensure they are proportionate and necessary. A comprehensive review could lead to more balanced development that aligns with both national energy objectives and local community interests.
- 19.4 In conclusion, the Town Council respectfully requests the Examining Authority to reconsider the suitability of the Saxmundham site for the Sea Link converter station considering these developments. Exploring alternative locations that may offer strategic advantages and reduced environmental impact could lead to more sustainable and community-aligned outcomes.

20. Mitigation and Community Benefit

- 20.1 Saxmundham Town Council remains deeply concerned by the limited and generalised nature of the applicant's proposed mitigation measures. These measures do not sufficiently address the scale, duration, and cumulative impact of the Sea Link project on the local community, landscape, and environment. A development of this magnitude, particularly one involving major above-ground infrastructure such as a converter station and access road, must bring with it a proportionate and enduring package of mitigation and benefit for the host community.
- 20.2 Should the Sea Link project be consented, Saxmundham Town Council considers it essential that a meaningful mitigation and community benefit package is secured to address the extensive and long-lasting harm to the town and its surrounding area. We wish to emphasise that our call for mitigation and community benefit is made **without prejudice to our formal objection. It does not imply support for or acceptance** of the Sea Link proposals. Rather, it seeks to ensure that, in the event the scheme proceeds, the local community is not left without redress for the disruption and damage caused.
- 20.3 Mitigation measures must extend beyond statutory planning obligations, which primarily aim to

minimise direct environmental harm. Community benefits serve a distinct and vital role: to recognise the disproportionate burden borne by host communities accommodating nationally significant infrastructure for the wider public good. Saxmundham and its neighbouring parishes face long-term landscape, amenity, environmental and socio-economic impacts that cannot be fully addressed through standard mitigation alone. The community benefit offer must therefore reflect both the scale of the disruption and the critical role the local area is being asked to play in delivering the UK's national energy strategy.

- 20.4 At present, the mitigation proposed is insufficient in scale, substance, and specificity. The project would introduce a vast industrial presence into an open rural landscape, near a rural market town. The limited landscape mitigation measures offered, such as sparse visual screening, are wholly inadequate to address the permanent change in character and setting. Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to deliver a substantially enhanced and enforceable mitigation strategy for the converter station, as detailed earlier in this representation. This must include significant landscape integration measures, such as earth-sheltering, sensitive massing and cladding, green roofing, and reinforced natural screening. These measures are essential to reduce visual harm, preserve rural character, protect key views, and support local biodiversity.
- 20.5 Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to implement a robust and enforceable Construction Traffic Management Plan, developed in close consultation with local councils and residents. As detailed earlier in this representation, this must include strict routing controls, time-limited HGV deliveries, real-time monitoring, and community reporting mechanisms, and targeted investment in road safety and pedestrian infrastructure. Given the cumulative impact of multiple NSIPs in the area, this strategy must be coordinated with other major infrastructure projects to reduce disruption, protect local safety, and maintain essential access for emergency services and local communities.
- 20.6 Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to deliver a substantially strengthened and enforceable noise and disturbance mitigation strategy, as outlined earlier in this representation. Given the proximity of residential areas, the strategy must include comprehensive acoustic measures, transparent monitoring and reporting systems, enforceable construction hour limits, and effective controls on light and dust pollution. These provisions are essential to protect public health, residential amenity, and overall community wellbeing throughout the construction and operational phases.
- 20.7 Saxmundham Town Council respectfully requests the Examining Authority to require the applicant to deliver a comprehensive and enforceable water management and flood risk mitigation strategy, as detailed earlier in this representation, to address the identified risks to water supply, surface water drainage, flood prevention, and ecological integrity throughout both the construction and operational phases.
- 20.8 Saxmundham Town Council respectfully requests the Examining Authority to consider imposing a statutory levy on each unit of electricity transmitted through the Sea Link converter station. This levy should be ringfenced in full for the benefit of the communities most affected by the onshore infrastructure. The scale and permanence of the disruption imposed on Saxmundham, and its neighbouring parishes demand a proportionate and enduring mechanism to redress long-term harm.

A community benefit fund, secured and administered independently, would ensure that meaningful compensation is delivered directly to the communities hosting this nationally critical infrastructure.

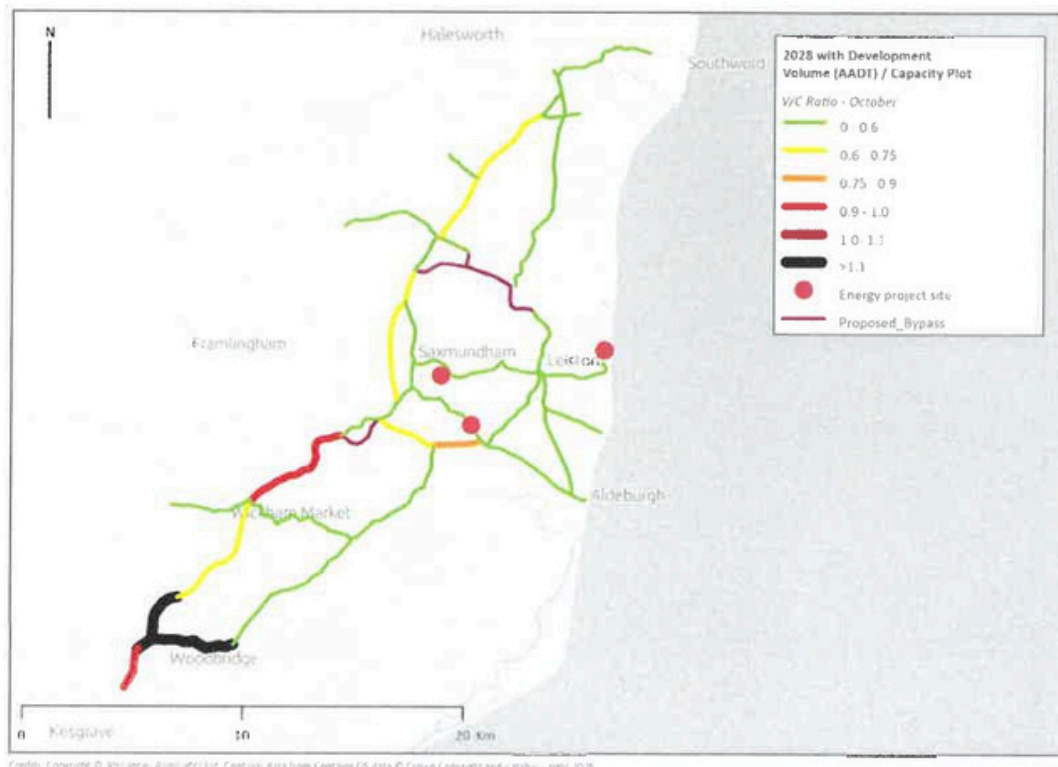
- 20.9 As part of our proposed community benefit approach, Saxmundham Town Council is pleased to introduce *Empowering Nature – Protecting Saxmundham*.⁶⁶ This initiative represents a proactive, community-authored response to the long-term environmental threats posed by energy infrastructure. It is an exciting example of the type of community benefit that we ask the Examining Authority to give serious consideration to. *Empowering Nature* demonstrates how local people can help shape the future of their town in the face of imposed change, and many of its proposals have been widely endorsed by residents, local organisations, and neighbouring parishes.
- 20.10 *Empowering Nature* is not a substitute for statutory mitigation. Rather, it is a bold call for nature-positive infrastructure and locally driven environmental enhancement. It offers a package of practical, deliverable projects to restore biodiversity, improve access to nature, and enhance community wellbeing. If the Sea Link project is consented, we invite the applicant to work with Saxmundham Town Council to bring forward early investment in this vision as part of a broader strategy to deliver mitigation and community benefits.
- 20.11 *Empowering Nature* sets out a conceptual vision for how long-term environmental mitigation and community benefit could be delivered in the event the Sea Link project proceeds. The vision includes indicative ideas such as the creation of new habitats and green corridors, accessible footpaths, investment in local biodiversity and nature-based recreation, and support for environmental education and social cohesion. Conceptual elements include a new Fromus Boardwalk and Nature Trail and sustainable travel connections, all of which reflect the priorities of national policy and the principles of the Environment Act 2021. Any such proposals would be subject to further design and assessment to ensure they do not cause adverse impact to neighbouring parishes or to protected sites, including the North Warren SSSI and wider Alde–Ore Estuary landscape.
- 20.12 Saxmundham Town Council urges that the mitigation and community benefit proposals under consideration, particularly *Empowering Nature*, are not dismissed as aspirational or incidental. On the contrary, they represent a serious, community-authored response to the environmental and social disruption caused by nationally imposed infrastructure. These proposals are grounded in local priorities, informed by community consultation, and designed to deliver tangible, long-term gains in biodiversity, public access to nature, and community wellbeing. They offer a legacy of benefit aligned with national environmental objectives and the widely accepted principle that host communities should be properly recognised and supported.
- 20.13 We therefore respectfully request the Examining Authority give full weight to these proposals and to seek formal undertakings from the applicant to engage with and support their delivery. Appropriate elements could be secured through a Deed of Obligation made under Section 111 of the Local Government Act 1972, between the applicant and either East Suffolk Council or Suffolk County Council, in consultation with affected parishes. Unlike Section 106 agreements, such deeds are not confined to mitigation but may include voluntary community benefits, acknowledging the substantial and lasting impact of hosting nationally significant infrastructure.

⁶⁶ Appendix 3 - Empowering Nature: Protecting Nature

21. Conclusion

- 21.1 Saxmundham Town Council recognises the strategic importance of strengthening the UK's energy infrastructure but maintains its objection to the Sea Link proposals in their current form. We are not persuaded that the applicant has demonstrated sufficient justification for the chosen location of the converter station, nor have they addressed the full extent of the likely environmental, social, reputational, and economic impacts on our town and its surrounding communities.
- 21.2 Saxmundham, as a small rural market town, stands to bear a wholly disproportionate burden from this nationally significant infrastructure. The proposal compounds the effects of multiple major developments already planned or underway in the area and risks inflicting lasting harm.
- 21.3 In the unwelcome event that the Examining Authority recommends development consent for Sea Link, we require it to be contingent on robust and enforceable mitigation, and on the delivery of a proportionate package of community benefit. We invite the applicant to engage with Saxmundham Town Council and local partners to ensure the town is not left to absorb the consequences of this project without meaningful redress.

Figure 15: Volume / Capacity Plot – 2028 with Development – Neutral Period (October)



6.2.2 The Volume / Capacity plots indicate the following:

- **Peak Period (August):**
 - The A12 between Wickham Market and the proposed two-village bypass (where the A12 reduces to a single lane in each direction) is forecast to operate just below its theoretical capacity in the future baseline scenario. However, the addition of traffic associated with the proposed development is forecast to result in this section of the network exceeding its theoretical capacity during these peak periods.
 - The A12 north of Woodbridge is forecast to operate above its theoretical capacity prior to transitioning into a dual lane carriageway. It is noted that this is observed in both the 2028 'baseline' and 'with development' scenarios. Similarly, this is also observed on Woods Lane (A1152) which runs to the north of Woodbridge in the east-west direction. This link is also shown to operate above capacity in the 2028 baseline and development scenarios.
 - The A12 north of Yoxford is forecast to operate under increased pressure compared to the baseline with v/c values of between 0.75 and 0.9 but remains operating within its theoretical capacity.

- An increase in vehicle flow on the A1094 is forecast, particularly the link between Church Common and Friston. This section of the A1094 is forecast to operate close to its theoretical capacity with a $v/c > 0.9$ within the development scenario. Whilst this remains just within the theoretical link capacity for the road, it does indicate that a detailed assessment of the cumulative impacts of the proposals in this location should be undertaken to confirm whether the forecast operation close to theoretical capacity results in any significant issues.
- Neutral Period (October):
 - The A12 between Wickham Market and the proposed two-village bypass (where the A12 reduces to a single lane in each direction) is forecast to operate below its theoretical capacity in the future baseline scenario. Whilst, the addition of traffic associated with the proposed development will impact on this section, in the neutral period it is forecast to remain just within its theoretical capacity (v/c values between 0.9 and 1.0).
 - The section between Wickham Market and the proposed two-village bypass (where the A12 reduces to a single lane in each direction) is forecast to operate close to its theoretical capacity ($v/c > 0.9$) whereas this was forecast to be exceeded in the peak periods.
 - Similar to the Peak Period scenario the A12 north of Woodbridge and Woods Lane (A1152) is forecast to operate above its theoretical capacity during both the baseline and with development scenarios.
 - As is the case in the peak month an increase in vehicle movements along the A1094 is forecast; however, in the neutral month the link is forecast to operate under its theoretical capacity recording a $v/c < 0.9$ within the development scenario.

6.3 Heavy Vehicle Impact

- 6.3.1 Given the nature of the proposed developments and the types of vehicle movements that will be generated during the respective construction phases, a separate assessment of HGV movements has been undertaken. To determine the impact of the additional HGV movements on the network, the cumulative (2028 baseline plus development) HGV traffic have been split from the Total Volumes outlined in Section 5 and presented in **Figure 16** and **Figure 17** for the peak and neutral periods respectively.



Sea Link - Relevant Representation - Appendix 2 - Church Street Traffic

Sea Link – Relevant Representation – Appendix 3

Empowering Nature – Protecting Saxmundham

Introduction

Saxmundham Town Council opposes National Grid Electricity Transmission's proposals for Sea Link, particularly the siting of a converter station near our town. We believe the project poses serious long-term threats to our landscape, biodiversity, and historic rural character.

However, we recognise that responsible leadership requires us to prepare for all outcomes. Should a Development Consent Order be granted, Saxmundham and its neighbouring communities face an unprecedented level of disruption, including landscape change, biodiversity loss, adverse traffic and socio-economic impacts, and wider environmental degradation.

The Empowering Nature initiative represents a proactive, community-authored response to the long-term environmental threats posed by energy infrastructure. It is an exciting example of the type of community benefit that we ask the Planning Inspectorate and National Grid to give serious consideration to.

Empowering Nature demonstrates how local people can help shape the future of their town in the face of imposed change, and many of its proposals have been widely endorsed by the local community. It sets out a conceptual vision which would, of course, be subject to detailed design and appropriate assessment to ensure deliverability and to avoid any adverse impacts on local landowners, neighbouring parishes, or designated ecological sites, including the North Warren SSSI and the wider Alde–Ore Estuary landscape.

Our Town, Our Choice

No mitigation can fully offset the ecological damage to this precious and ancient landscape. Productive, arable land will be lost, soil composition altered, and irreplaceable habitats destroyed. Yet, we believe if we can set aside our differences and come together, these projects could also become a catalyst for positive change - both for our people and for the many species that rely on this beautiful natural environment.

Our Vision

- A green corridor from Saxmundham to the coast, where wildlife can thrive along the route of the proposed bridge and cable trench, and where people can walk and cycle.
- A Fromus boardwalk where residents can engage with the river and surrounding nature.
- A community fund for new wildlife havens in our gardens: nature-friendly improvements for all, including water butts, bat boxes and ponds.
- Healthy, affordable food grown in a community orchard and allotment.
- Water harvesting to support biodiversity and to protect us from flooding.
- Restoration of the Great Wood for community use and biodiversity.
- Converter stations that also support locally commissioned art projects, wildlife habitats and solar panels.
- Training and support for local people to manage these initiatives.

A green corridor from Saxmundham to the coast

Farmland, compulsorily purchased for cable trenches, will not be able to go back into food production. We envision it taking on a new purpose as a nature corridor, featuring hedgerows and wildflower margins, and offering an accessible route to the sea for cyclists, walkers, and wheelers. The required bridge over the River Fromus should be future proofed as a rewilded, living structure and include an otter ledge to ensure safe passage for wildlife. The project will support local wellbeing, boost our tourism economy and enable other species to move in and out of the Suffolk Coast and Heaths National Landscape. We would also like to offer free bike hire from Saxmundham Station to promote sustainable and active travel.

A Fromus boardwalk and nature trail

After construction concludes, we propose a River Fromus boardwalk and a nature trail linking Fromus Green to the town centre. These features will allow the community to reconnect with nature and encourage sustainable tourism and footfall in the High Street via a circular route. Visitors will be encouraged to spend more time in our town—shopping locally and using it as a base for exploring the surrounding countryside on foot or by bike. The boardwalk, which will include a pontoon for safe river access, will put the river back at the heart of our community and enable the people who live here and who visit us to appreciate the rich diversity of the species it supports.

Community funds for all to support nature

We propose a Fromus Communities Scheme funded through a toll on energy transmission passing through the converter stations and revenue from solar panels on their roofs. This fund would offer all households in the five affected communities a choice of nature-supporting products with free installation (to support the wildlife species affected by the National Grid proposals).

Residents would select from a list of items which would include:

Hedgehog highways	Bat boxes
Native hedgerow saplings	Swift boxes
Ponds	Draught excluders
Bughouses	Water butts
Hedgehog hibernation and feeding stations	

The fund should also support solar and battery storage for community buildings.

Growing our own food

We propose creating an inclusive market gardening zone surrounding the converter station site. This can include allotments, and a community orchard run on permaculture principles to support and feed local people as well as visiting swifts, pollinating insects, hedgehogs and other wildlife. Our new green space will support health and wellbeing and reduce food miles and packaging waste. It can be irrigated by water harvested from hard surfaces and will benefit from native hedgerows, scrub and carefully managed wildflower meadows.

Managing our water to protect us and to improve our environment

Our water is a precious resource. The new bridge and converter stations will create hard surfaces which cannot absorb water. This could provide an opportunity for water harvesting solutions such as attenuation ponds, swales or bio-retention basins, which could be fully landscaped. This could help prevent runoff - reducing flood risk and mitigating the risk of pollution to the River Fromus.

Restoration of the Great Wood

The Great Wood lay to the south of Leiston Road and historically was a place of leisure for the people of Saxmundham. Some years ago, most of the trees were cut down to increase farmland, and it now lies within the boundaries of the Sea Link proposal. Post-construction, we propose that native trees are planted to restore the wood for community use and biodiversity.

Jobs and training for local people

The converter stations will not result in long-term job creation therefore we propose the Fromus Communities Scheme is expanded to enable businesses and community groups to manage the proposals outlined earlier and to support new initiatives such as:

- Training and employing local people to run the Fromus Communities Scheme.
- Employing local people to develop a website and an app to support the scheme as well as other projects such as citizen science, energy and water management.
- Green space management of wildflower meadows and hedgerows.

Creating community benefits from the converter stations

- Art Spaces: large-scale nature-themed murals commissioned by the community to reflect the local environment and to highlight flagship species.
- Living Walls: two sides of each building should feature vertical planting to create habitat for pollinators, swifts and bats.
- Solar Energy: rooftops could host solar panels to contribute to clean energy generation and feed the Fromus Communities Scheme.

A call for collaborative, nature-positive infrastructure

Planning expert Dr Andy Tickle supports many of the principles at the heart of these proposals, His report 'Greening the Great Grid Upgrade', published by CPRE, the countryside charity, calls for a more strategic and environmentally responsible approach to infrastructure delivery. He urges a new planning culture that aligns grid expansion with long-term social, ecological and landscape priorities.

It echoes our call for local voices to help shape how infrastructure is embedded into landscapes, ensuring places like Saxmundham and its neighbouring villages are not simply altered, but actively improved – with nature, community wellbeing, and heritage at the centre of design and delivery.

We call on National Grid companies to work with us; to go beyond the statutory minimums and show real leadership by delivering infrastructure that can enhance, rather than erode the landscapes and communities it affects.