

BENHALL & STERNFIELD PARISH COUNCIL

NATIONAL GRID SEA LINK – RESPONSE TO FURTHER CONSULTATION, JULY 2024

1. Overarching View

Benhall & Sternfield Parish Council (PC) acknowledge that the Sea Link project has been granted Nationally Significant Infrastructure Project (NSIP) by the Government, on the basis that it is necessary for the transmission of energy from the windfarms off the Suffolk coast, where it is produced, to the southeast of England, where it is to be consumed. However, granting of NSIP does not confer upon National Grid the right to industrialise and despoil vast areas of the Suffolk countryside, when there are alternative ways in which the objectives of Sea Link can be achieved.

Bringing the electricity onshore at Aldeburgh for conversion at Saxmundham before it is then transmitted via Friston to Kent constitutes a £1.8 billion diversion (Suffolk Energy Action Solutions). East Suffolk is not a suitable site for development of a major connection hub, and instead, the UK should be looking to develop a strategic offshore grid with conversion at brown field sites close to demand, in keeping with what our neighbours on the other side of the North Sea are doing. Therefore, the PC must OPPOSE the current proposals for Sea Link.

Notwithstanding the above, the PC has examined the ‘Further Consultation’ documents, and responds as below.

2. Introduction

In the previous consultation, Sea Link referred to the proposed accesses as Option 1 (via Redhouse Farm), Option 2 (from B1121, north of Saxmundham), and Option 3 (from B1121, south of Saxmundham). In the latest consultation, Sea Link refers to these options as ‘southern’, ‘northern’, and ‘western’. In the PC’s previous response Option 3 was referred to as ‘southern’, referring to its relationship to Saxmundham. This renaming by Sea Link creates confusion, and for clarification the previous comments by the PC to the southern access apply to the option that Sea Link now call western. All comments below will refer to access options by Sea Link’s revised nomenclature.

This response should be read in conjunction to that made by the PC to the statutory consultation in December 2023.

3. Access to Converter Station

In response to the non-statutory consultation in December 2022, the PC commented that the appropriateness of significant development must depend on suitable access. At that time Sea Link did not disclose any plans or options for accessing the Wood Farm site, or, indeed, any other site.

The documents for the statutory consultation in December 2023 showed three access options. During the consultation Sea Link informed the PC verbally that, since publication of the documents, they had discounted the southern access, and the permanent access would be western or northern. The PC restricted their comments to assessing the impact that the western option would have on their community, highlighting the significant safety concerns that would arise from pursuing this access. Sea Link have now discounted the northern access, in favour of a modified western access.

The modified western access is significantly more damaging to the Fromus valley, the setting of Hurts Hall, and creates flooding concerns. Had this been so shown in December 2023, the PC would have expressed a strong objection at that time. What is now shown is not a suitable access, but if this is the only access available, then the Wood Farm site for the converter station is clearly inappropriate.

Further, the PC response in December 2023 itemised critical safety concerns should the western access option be pursued. Sea Link have not included these in the recent documents as an integral part of the western access, although verbal acknowledgement was made at a webinar. Unless mitigation is accepted at this stage and the necessary land included within the boundaries to be depicted on the Development Consent Order application, there can be no assurance of delivery, and the proposed access route along the B1121 from the A12 to the western access point would inherently be unsafe. Sea Link must acknowledge that the very significant volume of HGVs that their proposals will generate will present a real danger to the well being of vulnerable road users (pedestrians and cyclists), and deliver appropriate mitigation.

Since the Statutory Consultation in December 2023, National Grid (NG) have confirmed that the Wood Farm site will be shared with Lion Link and Nautilus. Whilst NG have not published details of how these projects will overlap in terms of delivery programme, there was inference at a webinar that there would be overlap, and the peak traffic figures given for Sea Link are likely to be exceeded when traffic figures for all three projects are aggregated, even if the peaks are not coincidental. In addition, Sea Link have confirmed their intention to apply for consent to construct the Sub Station at Friston, should Scottish Power not deliver in time. This will create further traffic at the western access. Therefore, the traffic along the B1121 from the A12 to the access point is likely to be significantly higher than that stated for just Sea Link, and a higher figure should be assumed when designing the access and associated mitigation. The full impact should be considered from the outset; it would be folly to have to add further mitigation as successive projects started.

The PC has been working closely with East Suffolk Council (ESC) to develop a safe route between Benhall and Saxmundham as part of the roll out of ESC's Cycling, Walking and Wheeling Strategy. The key reason for the urgent need for this route is the serious negative impact of the HGV/LGV traffic movements for NG Sea Link construction. Delivery of mitigation should be consistent with the aims of this policy.

Whilst it is acknowledged that Sea Link have deleted the southern access via Redhouse Farm, a new access via Hill Farm, leaving the B1121, The Street, Sternfield, at the very same point is now shown. The intended use of this access is somewhat unclear, but any use will generate traffic along the B1121 through Sternfield. We must reiterate that the B1121 through Sternfield is in no way suitable for further HGV traffic. The farm traffic generated by

Redhouse Farm and the packing station at Hill Farm cause congestion along this substandard B class road, where a car and a lorry cannot safely pass. This access should be deleted, since no amount of rhetoric will convince anyone that it will not generate HGV traffic.

4. Working Hours

The proposal to extend working hours to Sundays and Bank Holidays shows contempt for the local community. Sea Link make vague suggestions that the type of work allowed on Sundays may be restricted, but not in a way that is sufficiently convincing to acknowledge that the community will be spared the daily nuisance from construction noise and activity for just one day a week.

5. Site Masterplan

It is now clear that Lion Link and Nautilus will be sharing the Wood Farm site. Therefore, consulting on just Sea Link, without developing a masterplan for the whole site, in terms of layout, aggregated traffic, drainage, footpath management and programme, is disingenuous. Sea Link talk of coordination with others, but see it only from their perspective, and fail to show empathy with the local community, who need to see the full picture before making their assessment of impact.

All projects that are to be sited at Wood Farm should be submitted for DCO concurrently, such that their combined and full impact can be assessed and considered by the public and the Planning Inspectorate in a single hearing.

6. Drainage

The PC notes that an attenuation pond is shown south of the converter site, and no water is to be pumped into the adjacent agricultural reservoir. It is presumed that this pond is only for the Sea Link works. The PC expressed concern in the previous response about the potential impact on downstream properties if the site drainage measures proved to be inadequate, particularly for the concentrated rain events that are becoming characteristic of our weather. Therefore, the PC would expect that drainage measures are designed with a comfortable safety margin.

6. Summary

The modified western access is damaging to the Fromus valley, adversely affects the setting of Hurts Hall, and creates flooding concerns. As such it is not a suitable access location.

If the western access is pursued, directing traffic through Benhall, mitigation must be an integral part of the design and ensured by any necessary land being included within the red line on the DCO application.

Mitigation should be consistent with the ESC's Cycling, Walking and Wheeling Strategy.

Traffic figures used to assess impact should be those from the aggregated works, not just Sea Link.

No traffic should be directed along the B1121 through Sternfield, and the access via Hill Farm deleted from the proposals.

Working hours should respect the need for the local community to have some respite from the nuisance of construction activity, and as such should not be extended to include Sundays and Bank Holidays.

A masterplan for the site should be shared with consultees such that the full impact can be understood, and responded to appropriately.

Site drainage is an on-going concern, and the design must address the concerns of concentrated rain events and downstream watercourse management.

All projects to be sited at Wood Farm should be the subject of a single DCO.