

Benhall and Sternfield Parish Council's

Response to National Grid Venture's (NGV's) Lion Link Targeted Consultation

The unprecedented and overwhelming number of Nationally Significant Infrastructure Projects (NSIPs) being developed or proposed for development in East Suffolk at the moment is giving rise to a relentless stream of major infrastructure proposals and, even though a Development Consent Order (DCO) should be a “once in a generation” event for local councillors, town and parish councils are being confronted with multiple DCOs and are having to step up to navigate the NSIP process and absorb the dramatic increase in workload that this entails.

Having spent a huge amount of time and effort attempting to represent the community's voice throughout the Sea Link DCO examinations, Benhall and Sternfield Parish Council (the PC) was dismayed to find that its carefully considered and highly informed submissions had been dismissed in NGET's Closing Summary Statement (EN020026-003595-9.145) in which 6,042 Interested Party submissions were described as containing “unfair and unfounded” criticisms that acted as a distraction to the examination process. The PC believes that this dismissal of the community voice by NGET displays a completely inaccurate interpretation of the heartfelt concerns that local residents were trying to impart and is based on a failure to recognise that the adverse impacts from East Suffolk's current infrastructure burden are already being experienced by the local population cumulatively and that this will certainly get worse as layer upon layer of infrastructure continues to be imposed upon them. The PC sincerely hopes that NGV will take a much more constructive approach to community engagement and will endeavour to work with the human beings stuck in the middle of all this infrastructure chaos in order to try to achieve the least-worst version of the Lion Link project possible.

The PC is struggling to keep on top of responding to consultation after consultation – to the extent that there was so much going on earlier this year that it was unable to submit a response to the Lion Link statutory consultation – and wanting to optimise the use of valuable time when responding to this targeted consultation, is only going to address two issues: the minimal change in position of the landfall site from G2 to G3 in Walberswick and the access route to the Saxmundham converter stations site.

The shift in location of the landfall site in Walberswick:

Moving the Lion Link landfall site in Walberswick from G2 to G3 – a shift of only 400m – is not a significant change in location and does nothing to address the glaringly obvious fact that Walberswick is utterly inappropriate as a landfall site. Indeed, the fundamental issue here is that East Suffolk was never suitable to become an energy super-hub, but the die was cast in 2017 when a connection commitment was made to the two Scottish Power Renewables (SPR) substations, EA1N and EA2 and the Lion Link and Nautilus Interconnectors to connect at a connection point in East Suffolk that didn't actually exist and without considering the consequences of shoehorning major electrical infrastructure into a setting constrained by the

close proximity of pre-existing local communities, the surrounding National Landscapes and Sites of Special Scientific Importance, the highly constrained rural road network, the eroding coastline, the combined problem of flooding and restricted water supply, the value of East Suffolk's unique environment and the importance of nature-based tourism to the region's economy etc. Finding locations at which to develop electrical infrastructure that "works" within these constraints is of course extremely limited and having made the connection commitment before taking all these confounding factors into account means that everything is having to be squeezed in retrospectively. Thus, Walberswick has ended up being identified as the "best" landfall site for Lion Link and Friston had the misfortune of being identified as the location for development of SPR's substations.

Not only was connection offered to Lion Link and Nautilus at a connection point that didn't exist, but also, it was offered to a pylon route that didn't have the capacity to support the connections. This created the need for Sea Link to take the excess electricity out of Suffolk to Kent, but the real problem that is at the heart of all this is that, since Sea Link provides the mechanism whereby electricity can be moved out of Suffolk, it frees up pylon capacity which in turn potentially lifts the lid on connecting more and more electricity projects to the NGET Connection Point at Friston that was embedded within the SPR substations application and is actually a *de facto* connection hub.

All this is taking place in East Suffolk despite the Examining Authority's warnings during the SPR substations examinations that it had only just been possible to mitigate for the substantial adverse impacts of developing the SPR projects and that caution should be applied when connecting further projects at Friston in the future. Whatever happened to planning balance here?

The access route to the Saxmundham converter stations site:

As with the preposterous decision to choose Walberswick as an acceptable landfall site for Lion Link and the absurd choice of Friston as a suitable site at which to develop a connection hub, the Saxmundham converter stations site has been chosen as the preferred location at which to build the Lion Link and Sea Link converter stations despite the fact that, assuming that NGET's route to access the site is adopted, the local community will inevitably be severely disrupted by the transport of HGVs – including super-heavy Abnormal Indivisible Loads (AILs) – along the totally inadequate B1121 through Benhall village, over the 46 tonnes weight-restricted Benhall railway bridge and over a brand-new bridge to be built over the River Fromus.

The PC is particularly concerned about road safety along the proposed access route through Benhall. The turning off the A12 onto the B1121 is completely inadequate to cope with a significant increase in HGV traffic and the B1121 is already a difficult road to turn onto from the 14 junctions along it between the A12 and the point at which the access route is due to turn up towards the converter stations site. There is a primary school within close proximity of the B1121 with many parents and pupils walking to and from Saxmundham, often with

children in buggies and on bicycles and the PC is very anxious that their safety will be compromised by shared use of the B1121 as the route to access the converter stations site. A dedicated cycling, walking, wheeling and horse-riding route between Benhall and Saxmundham is currently being established and road safety associated with this if the NGET access route is employed is of major concern and will need to be properly addressed with a view to installing safe crossing points and more. All these issues have been reiterated by the PC on many occasions throughout the Sea Link DCO process, but the PC has little confidence that they have been acknowledged by NGET and hope that NGV will pay much more heed to them when making decisions about accessing the converter stations site.

The four options relating to Benhall Railway Bridge as outlined in the targeted consultation need addressing:

a) Option 1 that proposes using a temporary mini-bridge every time AILs need to cross Benhall Railway bridge is not a viable option because, even if it could be successfully delivered, it would be associated with disproportionate, unjustifiable adverse impacts and was consequently dropped from the Sea Link DCO option list and should be dropped from Lion Link's list forthwith.

b) Option 2 of installing an over-bridge throughout the duration of construction of both Sea Link and Lion Link would prove extremely disruptive for the local community. In addition, the significant increase in HGV traffic going over the bridge during this time would inevitably damage it to such an extent that it would then require strengthening (as outlined in Option 3) anyway.

c) Option 3 to strengthen the bridge before construction at the converter stations site begins, although providing the only potentially viable option, but is not without its significant difficulties.

d) Option 4 is the proposed AIL route for the SPR substations and although the route has already been consented as part of the SPR projects, it has not been assessed yet and, according to Suffolk Highways, is far from certain – especially where it will go through Leiston over the Victorian sewers and along the totally unsuitable road through Friston. It will also impact badly on other communities but this does not seem to have been taken into account and the method by which vehicles will progress to the converter stations site once they have arrived at the Kiln Lane site at Friston is not even mentioned. One wonders what Option 4 is even doing on the list?

Therefore, excluding Option 1 as a non-viable option, recognising that Options 2 would inevitably lead to Option 3 anyway and discounting Option 4 because it would lead to increased adverse impacts rather than reducing them, only Option 3 stands as a possible option, but as that too would be seriously impactful, the PC would like to ask: how can the local community be expected to endure these significant safety concerns for years to come if

an alternative access route can be identified and requests that a whole new approach to accessing the converter stations site is taken immediately.

Alternative access to the converter stations site:

Suffolk Highways expressed such significant concerns about the very deliverability of NGET's access route to the converter stations site that Suffolk County Council (SCC) proposed an alternative route that shares the Sizewell Link Road and then accesses the site from the North via the disused Leiston Airfield. If SCC's proposals were adopted to access the converter stations site instead of NGET's route, construction traffic would no longer need to pass through Benhall, there would be no need to cross the Benhall railway bridge or to build a new bridge over the river Fromus and all the immediate local impacts and associated harms (such as environmental, heritage, flood-risk, landscape and visual impacts etc) of NGET's proposed route would be completely avoided. In addition, any risk of crossing Benhall railway bridge leading to delays to the Lowestoft to Ipswich passenger route and SZC's Green Rail Delivery route would be removed.

Although SCC's proposed route would of course create some adverse impacts of its own, on balance, these would be considerably less than the impacts of accessing the site through Benhall, but when the new route was initially discussed during the Sea Link examinations, NGET's response was to say that the increased journey time that would be incurred by using SCC's slightly longer route would delay delivery of the project – with no mention of the considerable local impacts that would be avoided. Since then, various other reasons for not properly scrutinising SCC's route – such as having to cut down an extra 12 veteran oak trees and dealing with contaminated land on the disused airfield have been mooted by NGET and NGV. Of course, no-one wants to see trees cut down unnecessarily and we would rather see many more being planted, but the region has already been stripped of in excess of 23,000 trees in preparation for construction of SZC and residents have become hardened to the loss of a few trees when weighed against minimising severe adverse impacts for the local community. As for the impacts of the contaminated soil, the local community which stands to be deeply impacted by the access road through Benhall would like to see where the balance lies with this and would like to point out that SCC's route clearly sits much higher up the mitigation hierarchy than NGET's severely disruptive proposals. Furthermore, sharing the Sizewell Link Road – a route specifically designed for use by construction traffic – would be a good example of constructive cooperation and coordination between Developers.

In view of the extreme cumulative impacts resulting from East Suffolk's completely unprecedented infrastructure imposition, it is of course critically important that Developers do as much as possible in order to reduce the effects that their projects will have on the local community. In the context of the proposals for accessing the converter stations site, instead of battling on with NGET's proposed route through Benhall, come what may in spite of and at the expense of the local community, at the very least, addressing SCC's proposals to access the Saxmundham converter stations site via the SLR is one way in which a large number of

adverse impacts can be greatly reduced and, in some cases, even completely avoided and surely deserves proper scrutiny. So if nothing else, the PC would like to assist NGV with achieving a less-bad version of the Lion Link project than is currently being proposed by pushing for improving the access to the converter stations site by adopting SCC's alternative access route and therefore proposes that NGV and NGET take the access route to the converter stations site back to the planning table and properly examines the route as proposed by SCC in an effort to help reduce the extreme cumulative impacts that the local community will have to endure for many years to come.