

Submission to Planning Inspectorate Deadline 2

Commentary on Suffolk County Council and East Suffolk Council's Local Impact Reports

On behalf of Marlesford Parish Council

Regarding

National Grid Electricity Transmission DCO Application

For

The Sea Link Project (EN020026)

Chairman Marlesford Parish Council

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Introduction

1. Introduction

Marlesford Parish Council (MPC) has reviewed the Local Impact Reports (LIRs) submitted to the ExA by Suffolk County Council (SCC) and East Suffolk Council (ESC). MPC has a number of concerns as set out in its Relevant Representation of 11th June 2025. Principally, it is concerned that the Applicant's assessment of cumulative impacts from the Sea Link project are significantly underestimated as a result of the Applicant's limited study area. This issue is borne out in several references in the SCC LIR, notably at §11.200 and by ESC at §7.8.4.7.

MPC has largely confined its comments on the LIRs to those matters that directly affect Marlesford.

2. Highways Issues

- i. At §11.75 SCC refers to the fact that the A12 "is a mix of dual carriageways south of Wickham Market designed and built around forty years ago with sections of evolved single carriageway sections unchanged other than through local improvements. It mostly avoids passing through settlements other than the western fringes of Woodbridge, Yoxford and Wrentham and Lowestoft but does pass through smaller villages such as Marlesford, Little Glemham, Stratford ST Andrew, Farnham and Blythburgh." This statement is broadly correct, but the ExA should note that Stratford St Andrew and Farnham will be bypassed as a result of works currently being carried out by Sizewell C (SZC). Marlesford and Little Glemham should have been included under a "four village bypass" scheme, but we were excluded, and Marlesford and Little Glemham remain severed communities (the first severed communities north of the M25) with an ever-increasing volume of traffic, particularly HGVs associated with the East Suffolk energy projects. We ask the ExA to recognise the special circumstances faced by Marlesford and Little Glemham in relation to the A12.
- ii. MPC recognises the improvements being made to the A12 through Marlesford and Little Glemham as a result of mitigation works being carried out by SZC and Scottish Power Renewables (SPR). These mitigation works are referenced at §11.81 by SCC, but we would argue that they are being implemented as mitigation for the approved schemes and their scale and scope should not be regarded as sufficient to mitigate for adverse impacts caused by the Applicant's project or future energy projects such as Lionlink. We have therefore set out our requests for additional mitigation in this response.
- iii. §11.124 of the SCC LIR raises some specific and important issues that the ExA should take note of and consider when assessing appropriate mitigation:
 - SCC references the impact of variable and seasonal traffic peaks. These relate in part to
 this area of east Suffolk being a holiday destination, but also to its importance as an
 agricultural area. At certain harvest times, agricultural vehicles can markedly slow traffic
 flows the increase in traffic associated with the applicant's scheme will only exacerbate
 already heavily trafficked minor and major roads.

Mitigation: In view of the significant seasonal peaks in traffic on the A12 and its feeder roads, we ask that the ExA put the Applicant under an obligation to contribute to the existing biannual traffic monitoring being carried out by SZC <u>and</u> in addition, to fund traffic monitoring in the peak summer holiday period around August Bank Holiday.

• It is recognised that traffic delays cause frustration to drivers and can lead to risk taking. In addition to §11.124, SCC refers to Bell Lane, Marlesford, and in §11.170 they comment on the Applicant's narrow assessment of cumulative impacts along the A12 between Seven Hills and Lowestoft. MPC agrees that the Bell Lane junction is of real concern from a safety perspective, particularly for vehicles turning right on to the A12. Whilst Bell Lane is the most serious concern, MPC would also ask the ExA to note the difficulties for right turning vehicles joining the A12 at Marlesford Road and Ashe Road.

Mitigation: The Applicant should be under an obligation to (as far as is possible within the highways constraints) remodel the Bell Lane Junction with the A12 in Marlesford in order to deliver improved visibility.

Mitigation: There should also be a requirement to improve the road signage and road markings at the other Marlesford junctions with the A12 (as well as other junctions along the A12 that will be affected by the Applicant's proposals.

• At §16 in MPC's RR we demanded the upgrading of the pedestrian footpath from Marlesford Road, Marlesford to the Fiveways roundabout in the vicinity of SZC's Southern Park and Ride. We are pleased to see that SCC reference this footpath in their LIR as being a "narrow footway between Marlesford to Wickham Market bypass, causing pedestrian anxiety". We agree, and ask the ExA to put an obligation on the Applicant to contribute to the relocation of the footpath to the north western side of the hedge adjacent to the A12 so that pedestrians and other users have adequate separation from the A12 carriageway.

Mitigation: That the Applicant contributes the majority share of the funding for the improvements to a pedestrian and cycleway between Marlesford Road, Marlesford and Fiveways Roundabout, Hacheston.

SCC's §11.197 sets out a number of adverse impacts which will affect Marlesford and Little iv. Glemham (but note, the Two Village Bypass will mitigate these effects for Stratford St Andrew and Farnham). The impacts result from a significant increase in HGV movements on the A12, which will add to the preexisting effects of severance, have negative impacts on air quality, noise, road safety and will add to delays along the Marlesford and Little Glemham stretches of the A12. MPC agrees with SCC that these adverse impacts will lead to increases in fear and intimidation faced by Marlesford and Little Glemham residents. Marlesford and Little Glemham have more than 50 dwellings that are within 20m of the carriage way and a good number are much closer than that. The adverse impacts from HGV movements over and above those already being experienced by residents as a result of SZC and SPR are likely to impact the quiet enjoyment of their properties which this council believes residents are entitled to. We have concerns about impacts on sleep and on general mental health as a result of exposure to heavy increases in HGV trips as a result of the energy projects. At §11.197, SCC also calls for improvements to the Bell Lane/A12 junction – MPC fully endorses this call and would ask the ExA to note this as part of the required mitigation by the Applicant (see §iii above).

Mitigation: For properties within 20m of the A12 carriageway in Marlesford and Little Glemham, the Applicant should be required to fund the necessary insulation to properties in Marlesford and Little Glemham to ensure that noise (and the effects of vibration) is reduced to acceptable levels.

v. The scale of the daily increases in HGV traffic are set out in SCC's §11.186 where they state that the SZC and SPR movements at peak will be 700 and 210 respectively, but they also note that the Applicant's movements will be 346 two way movements. If the projects run concurrently, additional HGV traffic flows could, in total be 1,256 – a volume that this council argues is an unacceptable burden on its residents. MPC calls on the ExA to demand more and better sensitivity testing of the effects of the Applicants proposals on Marlesford and Little Glemham residents.

Mitigation: Residents in East Suffolk are currently experiencing high levels of HGV traffic serving the already consented energy NSIPs and other solar farm projects. It is difficult to report the bad behaviour of some HGV drivers unless the vehicle can be positively linked to a project. MPC asks the ExA to require the Applicant's HGVs to carry a notice on the rear of the vehicle and in the windscreen to identity the project on which the vehicle is working.

Mitigation: On roads identified as being most susceptible to rat running, the Applicant should (subject to agreement by the relevant communities) be required to fund signage and or other measures to discourage use of unsuitable lanes by rat running traffic, or fund the introduction of "Quiet Lanes".

3. Cumulative Impact

i. The effects of cumulative impact are frequently referenced in SCC's LIR and several of those references are referred to in the Highways section above. At §5.2.8 of ESC's LIR they refer to the fact that "NPS EN-1 and EN-5 encourage project promoters to build coordination into their projects at both the strategic and detailed design stages of development, particularly in areas such as East Suffolk that are facing a significant number of concurrent projects, giving rise to cumulative impacts being introduced on local communities". This Council is concerned that whilst there are now some signs of cooperation between SZC and SPR, they have been slow to emerge and a lesson for future NSIP projects is that a more rigorous obligation should be put on this Applicant and future applicants to cooperatively find ways to lessen adverse impacts on the local community. These areas should particularly be around transport and traffic management and shared use of facilities to allow for HGV driver tachograph breaks so that laybys on the A12 can be kept clear for private car users. The lack of proper coordination is underlined by ESC in §3.0.3 where they say "ESC remains disappointed at the lack of any meaningful engagement by NGET with other energy scheme promoters locally with a view to identifying the sharing of opportunities to reduce cumulative impacts". MPC wholeheartedly agrees with this statement.

Mitigation: We ask that the Applicant is required to work with other NSIP projects to find ways of minimising its impacts on East Suffolk roads. There should be cooperation in the sharing of facilities that, for example, take HGVs off the public highway for the duration of tachograph breaks.

Mitigation: The Applicant should be under an obligation to limit the number of workers traveling to its construction sites. Appropriate use should be made of existing park and ride facilities and where possible access should be given to SZC facilities for the Applicant's workers.

ii. Both SCC and ESC are concerned that the zones of influence of the Applicant's project have been drawn very narrowly for its assessment of impacts on socioeconomic factors. As a result, the Applicant doesn't properly recognise the cumulative impact of its project alongside other ongoing NSIP projects. MPC shares ESC's disappointment, expressed at §7.8.4.5, that that the Applicant

concludes that "no significant cumulative effects on socioeconomics, recreation and tourism are expected because of the Suffolk Onshore Scheme". MPC believes that this is a misrepresentation of the likely impacts of the Applicant's proposals.

4. Hours of Work

i. MPC notes that the Applicant is reserving the right to work over weekends and Bank Holidays. There has already been a precedent set in the construction working hours for other NSIPs. None of the SZC associated developments sites, and SPR's EA 1N or EA2 sites work on a Sunday or Bank Holiday. This restriction is in place to help protect the local community from the effects of seven day a week traffic and noise impacts. If seven day a week and Bank Holiday working were to be allowed, MPC believes it would have significant adverse impacts on the mental health and wellbeing of its residents. We agree with ESC's observations at §7.4.2.3 and SCC's comment under §12.15 "Public Health", regarding impacts on mental health and urge the ExA to impose working hour limits on the Applicant which are consistent with other already consented NSIPs.

5. Conclusion

MPC broadly agrees with the conclusions, comments and recommendations contained in both the SCC and ESC LIRs. It welcomes the way in which they have advocated for measures to alleviate the adverse impacts that will affect residents in East Suffolk. We disagree with SCC on the traffic impacts on Stratford St Andrew and Farnham as these two villages will be bypassed by the time that the Applicant's project starts (if approved). MPC considers that Marlesford, Little Glemham, Benhall, Sternfield and Friston are the small villages most likely to be affected by the impacts of this development.

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Chair
Marlesford Parish Council

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