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RR No: 2496
Project: Sea Link EN20026 Refuse consent

RE: Response to Responses to Relevant Representations– REP1-116

Taunting Traffic and Transport

If this document is anything to go by, this project is in deep trouble.

Between 7.10.1 and 7.10.2 is a huge gap.

7.10.1 *'does not identify any significant impacts on the highway network during the construction phase'* unless they have chosen only to consider the A12 as a 'highway'.

Yet 7.10.2 identifies the Benhall Bridge as carrying 97% of construction traffic: *'The main access routes for the Proposed Project during the construction phase comprise the A12 and the **B1121 Main Road**... These routes are forecast to accommodate around 97% of the construction vehicle trips. The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122..., B1121..., **B1121 Main Road**...'* huh, what?

Followed by:

*'For example, construction traffic travelling to/from the B1119 and through Saxmundham will be limited to environmental mitigation and mobilisation works ...of the Fromus Bridge only, ... over a period of four months ... with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the **B1121 Main Road**...'* whah?

How can this **not** be significant if **97%** of all construction traffic is on the **B1121 Main Road**? Or is it only insignificant because traffic will be concentrated on the mere kilometre between the A12 and the Fromus flyover?

Then there is the Benhall Railway Bridge, on the **B1121 Main Road**. First, they ignored Highways flagging this bottleneck over a year ago, then they decided to alter the load from 36 tonnes to 300 tonnes (just to make Friston's build easier), yet they claim *'The Proposed Project has gone through a robust process of route selection and design development informed by the environmental impact assessment process, ground investigations, various consultation stages and feedback received from consultees. As such the proposals have, whenever possible, avoided impacts through sitting (sic) and routeing, design layout and/or timing of works.'*

All this to justify the Wood Farm site selection, for if the Benhall Bridge weak link hadn't been swept under the carpet, then Saxmundham wouldn't look such a promising site.

But now that the GBR and Woodbridge Town Council have awoken to the potential snag of abnormal indivisible loads falling off the bridge onto the railway line,

suddenly there is no need for the 'optimal' solution of a huge Felixstowe-style flyover (and compulsory purchase), but only a '*mini-bridge*' and '*minor works to repair the bridge*.' Throw Friston substation under the bus. So it's a minor repair upgrading a bridge load capacity from 30 tonnes to 300 tonnes? Magic!

Then there's noise. Common sense says that if 97% of construction traffic is on the **B1121 Main Road**, the 7.7.5 assessment which '*...indicates that construction traffic noise would not lead to significant adverse effects on Noise Sensitive Receptors close to any proposed construction traffic route.*' is bollocks. I live 300m SE of the bridge, and I used to hear Folk East 4km away. What do you think?

Landscape Mitigation

As proposed by an AI software branded Alice: '*... effects have been minimised through the optioneering process and proposed landscape mitigation.*'

Optioneering, a process used in the failed HS2 project for the Copthall Green Tunnel, Euston station tunnels and the viaduct/twin bored tunnel. All AI-based. Not a good look, using a failed NSIP project to promote a Landscape Character Assessment technique (7.7.6 p 30).

Assessments of potential impacts by NGG are **not** independent – it is in the **financial** interests of NGG to designate all issues as '*minor adverse (not significant) effect*' or '*temporary and localised*' or '*would have no significant effect*'; no '*potential significant adverse effects*' with '*Robust mitigation measures to remove or reduce the significance of impact*'; '*The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce cultural heritage impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as the sensitive routeing and siting of infrastructure and temporary works.*'; '*The Applicant has assessed the Proposed Project's impact...*' blah, blah, blah.

NGG repeatedly states that the chosen locations represent the '*most suitable*' or '*least harmful*' options. Selecting this route and site based solely on electrical efficiency (cheaper) ignores the lived reality that this area is disproportionately burdened.

As Petruchio's 'tis the moon' gaslights Katherine in Shakespear's 'Taming of the Shrew' – saying something is negligible or not adverse does not make it so.

How long??? (7.7.1/2)

'...a very small loss of trees associated with the HVDC corridor...the majority of the HVDC corridor would be restored to the former land use. Areas of agricultural land would be restored quickly, whereas hedgerow reinstatement would take comparatively longer to re-establish along with reinstatement of acid grassland.' meaning never in my lifetime.

Wait, it'll be **15 years** before a semblance of restoration is apparent? – and then only 1/3 will have this? So not only do we the local residents suffer 10+ years of construction, there is another 15 yrs before even a semblance of mitigation appears! Even on top of a bund, trees will never hide the 26m tall substation.

25 years of disruption for an obsolete technology. What a waste of money, except the dosh diverted to NGG's shareholders.

The gift that keeps on giving - after mitigation the converter stations, substations, trenches, access tracks and overhead lines will create a permanent industrial footprint in this rural landscape.

NGG's 'assurances' regarding making good will melt away once works are complete and we will be left with the devastation. Even NGG itself doesn't know how these works will pan out – we have to take their word that their subcontractors (7.3.2) will do a good job (not just the cheapest job). As Mike Elmer, formerly of NGG, agreed with me, self-certification is not a robust methodology for quality assurance. Who will bell the cat?

Work Hours

Unconscionable work hours – NO week-end nor holiday hours.

Future technologies

Short sighted realisation of future technological breakthroughs which will render these facilities obsolete – operative word is future as by the time this project is complete, 10 yrs late and at three times the cost, the world will have moved on.

Water?

East Suffolk is a desert! Constructing reservoirs and pipelines is laughable. There is a reason the Industrial Revolution's weaving mills arose in the north – they took advantage of the local energy source – water.

Co-mingling Kent and Suffolk - disingenuous

This is a well-known strategy to misrepresent views and is exactly the same play as Chelsea Football Club's in 2015 when trying to force through the expansion of Stamford Bridge – the local Fulham resident responses were diluted in the global cohort of Chelsea supporters in order to demonstrate that only 0.02% of total responses were against the re-development. As Mark Twain quoted Disraeli, 'Lies, damned lies and statistics.'

Refuse this application – it uses verbiage to camouflage its serious flaw, an out-of-date technology supporting an out-of-date energy generation strategy.