

Sea Link DCO: response to the consultation

I've lived in [REDACTED] for five years and been visiting here for nine years. In that time I have witnessed the accumulation of NSIP's in a very localised area in this small and rural community. Any one major infrastructure project in this area would have a significant effect on the community during construction and a lasting, adverse impact on the village and the welfare of its residents. But, no, there are four NSIP's competing for space, construction labour, road access and infrastructure resources. The cumulative effect of these projects and simultaneous construction programs has never been assessed. When one of these projects is a nuclear power station that will almost certainly not come on stream for 15 to 20 years with a concomitant construction & commissioning program then the prospect for rural Suffolk is overwhelming. Notwithstanding the engineering argument for coming inland with a cable network, only to take it offshore again, with absolutely no benefit to local electricity consumption, reduced bills etc and the need to completely reassess the engineering assumptions for the Suffolk development in the first place I shall concentrate my response on location, access and visual impact.

Location

The site for the huge development is not tucked away in a low lying brownfield area, out of sight for the great majority of people but on a hill top farm with great agricultural soil and exposure to all points of the compass. From the site it's possible to see several miles across green countryside in all directions and is very close to a small community of dwellings on the south side at Sternfield. The scale of the development for one converter is huge: that is land area and height. Further, access to the site has not been resolved. A decision has been made on location without rigorous consideration, until recently of how to actually get to the site.

Access to the site

The 'Western' access to the site, off the A12 and via the B1121 Saxmundham Road is being reconsidered due to the significant cost and disruption created by temporarily or permanently strengthening the Benhall railway bridge and building a new bridge over the Fromus. The alternative route proposed by Suffolk County Council, the 'Northern route', coming down from the new Yoxford roundabout and via part of the Sizewell link road, must force a rethink on the actual location of the site.

To take the access road so far North west of the site only to return via a very long route back to the Saxmundham site has no logic or merit. I fully support the 'Northern' route. If implemented, the existing proposed location for the multi converter site, close to Saxmundham and on the top of a hill has no technical, engineering or financial merit. A new site, as close to the Sizewell link road and using it for construction has significantly more logic, again from a technical, engineering and financial standpoint.

Adequate LVIA

Such a development of the proposed scale and location clearly requires a Landscape and Visual Assessment and that it should be executed with the rigour of methodology set out in Application Document 6.3.2.1.A Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology, and the PEIR Volume 2.2A;).

However, despite the sites exposed location, the LVIA has only six images. What is particularly lacking are any views that give a good understanding of the electrical transmission infrastructure, pylons, switch gear and the like that will be as obtrusive, visually, as the main buildings. Views 5 & 6 have been taken from low level and show the proposed development partly hidden by trees. I argue that more distant views at the same compass locations, more distant and at a higher elevation would give a truer rendering of the installation. This is particularly true if taken from the junction of Snape Road, Kiln Lane and Red Lane and from the Leiston to Saxmundham road, B119, junction with Kiln Lane. These views at a higher level, across farm land will show the real visual impact of the development. Add the transmission infrastructure and a more accurate visual impact would be very clear.

Mitigation

The intention is good: three cited documents propose a design approach that, 'seeks to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact; giving consideration of the 'orientation and massing of the Saxmundham Converter Station in order that existing landscape features can be retained and enhanced' and 'designing and arranging the converter station building to be sympathetic to their surroundings and be integrated into the landscaped setting of the site.' Design Approach Document 7.11.1. The National Policy statements EN-1 section.4.7.6 states "Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation.

A further document: The Preliminary Environmental Report Document 2.2.9.4 Mitigation measures, states: 'Locating the Saxmundham Converter Station as far as practicable within the southern extent of the site, away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact: and give (sic) — Consideration of the orientation and massing of the Saxmundham Converter Station in order that existing landscape features can be retained and enhanced (woodland, hedgerow planting)...

So, it comes as a surprise that no mitigation is shown in any of the LVIA images and therefore no attempt to follow the good guidelines in the documents referenced above. Such mitigation in the form of planting and earth management in the form of banks and berms would help significantly in reducing the visual impact of the development. This is particularly true looking at Viewpoint 4: Public bridleway southeast of Saxmundham where the co-located converter station is very close to the road.

The huge volume of arisings from site excavations must be utilised on-site to provide primary screening not only for the primary converter development but for the co-located converters too. Indeed, if ground floor levels were reassessed the reduction in height and increase in arisings would go a long way to meeting the environmental goals and reducing visual impact while providing additional material for land form screening. Furthermore, this must be one of the first actions on the site as soon as excavations commence to give time for physical and planted screening to mature. Such use of excavation arisings, from site, used on site will further reduce excavated material going off site and the consequent reduction of HGV movements.

In summary:

adopt the alternative site approach and access proposed by SCC and, logically resitet the the converter site north east of the Saxmundham site towards the Sizewell link road, benefiting already form the Planning consent for that road and its current construction status.

In any site proposal. diligently apply LVIA methodology to fully convey views of the development including long distant views and accurately showing the extent and scale of transmission infrastructure in addition to the buildings themselves and include all mitigation

The Sea Link Converter must not be built on the Saxmundham site. From a technical, engineering and financial analysis and permanent and construction access, it can be far better sited and constructed significantly closer to the Sizewell link road, on a brownfield site.

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