BENHALL AND STERNFIELD PARISH COUNCIL

Nautilus Interconnector – response to non-statutory consultation <u>September 2021</u>

This response is split into three parts.

- 1. Comments on the process and in particular the cumulative effect of a series of applications for major energy infrastructure projects in East Suffolk.
- 2. Comments on the options shown in the consultation documents.
- 3. Suggestion of the way forward.

Part 1 – The Process

The Parish Council supports the principles of wind power and multi-purpose interconnectors (MPI), but takes issue with the delivery process.

Nautilus is one of a series of on-going infrastructure projects that impacts on the communities in the Leiston hinterland. Each is classified as a Nationally Significant Infrastructure Projects (NSIP), and follows the prescribed route to a Development Consent Order (DCO). Each project is presented by a panel of professional 'experts', and the protection of the communities and the countryside is largely in the hands of volunteer parish and town councillors, arguing the same points repeatedly. There can be no doubt that these councillors are on the verge of application fatigue. The DCO process may well be fit for one-off NSIPs, but the series that we are being confronted with is eroding the balance of the system to such an extent that applications might soon simply be nodded through. That would be unacceptable, must be acknowledged, and a better model found.

The Parish Council looks to central government to step in and to work with all levels of local government to find a way in which the on-shore infrastructure for all current and foreseeable projects can be considered in the whole, rather than the current piecemeal approach. This would have the potential to accelerate delivery of energy projects in line with government targets.

Looking specifically at the principle of MPIs, we understand that there is no surety that other windfarm promoters will connect to Nautilus, and may prefer to build their own on-shore infrastructure. This would be totally unacceptable. Whilst any MPI has capacity to accept power from a windfarm, we implore government to reject any future proposal to do otherwise.

Part 2 – The Options

There is an implication in the documents that anything outside the AONB or Heritage Coast has no landscape value, and is quite suitable for the type of infrastructure proposed. The landscape of Suffolk is not flat; it is gently undulating and offers a tranquil environment with abundant wildlife. Simply dropping a 5 hectare, 24 metre high, converter station into such an environment, albeit outside the designated areas, will do immeasurable harm and this must be appreciated by those so

proposing such. We support the view that greenfield sites should only be considered after brownfield options have been shown to be impracticable, and that includes challenging both the decision that the connection must be made at or near Sizewell, and the apparent lack of availability of land at Sizewell. Should it be fully demonstrated that there is no suitable brownfield site, we would suggest that specific consideration then be given to semi-brownfield sites such as former WWII airfields, which were depopulated 80 years ago, and remain largely so.

Although this consultation is for a single converter station, it is quite apparent that, if successful, other energy promotors will look to piggy-back the decision, and apply for their installations on adjoining land. Therefore, notwithstanding that Nautilus is to be an MPI, and should reduce the need for some future onshore installations, the site options presented have been considered on the reasonable assumption that they will eventually host multiple installations.

Regarding the five converter site options, The Parish Council restricts its comments to only those which directly impact on Benhall or Sternfield, namely CSA1, CSA2 and associated cable routes.

Before making specific comments, we note the omission from the list of assessment criteria that of consideration of the grade of agricultural land to be lost to development, as required by government document 'Guide to assessing development proposals on agricultural land'.

CSA1 is on grade 2 (very good) agricultural land. Most of the land between Leiston and Saxmundham is grade 3 (good to moderate), and the loss of grade 2 land is contrary to all logic. Further, this site sits on high land within the undulating landscape, and any installation would be highly visually intrusive from numerous viewing points. A right of way passes through the site, north to south, forming part of the route from Saxmundham to Snape. Adoption of CSA1 would have a deleterious effect on the enjoyment of walkers and equestrians using a non-motorised route.

CSA2 is on grade 3 agricultural land. It is in an area which is devoid of any natural screening to the north and east, and will be visually intrusive from the B1119 and way beyond. The right of way comment for CSA1 applies equally to CSA2.

It is noted that for all the option sites, the boundaries have been carefully chosen to avoid residential properties. However, there are properties close to both CSA1 and CSA2 and the impact on these must not be underestimated. It would affect quality of life for the residents as well as significantly reducing the value of their properties. Simply drawing boundaries to avoid a person's house does not abrogate National Grid Ventures' moral responsibilities to them.

The disruption from the construction of cable routes obviously is transitory, but nevertheless must be considered. The B1121 through Sternfield to Friston carries a significant number of large agricultural vehicles serving local farms, and road closure of more than a day or so would be damaging to their businesses. The route shown between CSA1 and CSA2 passes very close to residential properties. This would cause unnecessary nuisance, and should be moved further away.

It is appreciated that routes for construction traffic may not have been considered at this stage, but may become a criteria when assessing the options. To this end we would point out that the B1121 through Sternfield is not a designated lorry route by the County Council, notwithstanding it being a B class road (refer to Suffolk County Council – Lorry Route Network). Scottish Power acknowledged that this road is not suitable for construction traffic, and it is to be expected that National Grid Ventures will equally accept that this road is not suitable for construction traffic.

Part 3 – The Way Forward

The current piecemeal approach of scattering of on-shore energy infrastructure across a wide area of East Suffolk is damaging to both communities and the countryside. Whilst it is appreciated that constructing Nautilus as an MPI may reduce future infrastructure, more will certainly follow.

We support the alternative approach of clustering on-shore infrastructure, preferably on a brownfield site, so that the amelioration of the damage can be concentrated, appropriate access created, the rest of the wonderful countryside left unspoilt, and the on-going uncertainty within communities eliminated

Circulation

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