

## FINAL Benhall and Sternfield Parish Council's Comments for

### Deadline 2 of the Sea Link DCO



Benhall and Sternfield Parish Council (the PC) was shocked recently to read how National Grid had responded to the thousands of Relevant Representations (RRs) that were submitted during registration for the Sea Link DCO because the vast majority of these had just been grouped together into meaningless thematic response lists that only demonstrated which subjects were commented on and nothing else. This lack of substantive response means that issues based on local information that were highlighted by Town and Parish Councils trying to represent the community's best interests have effectively been ignored. For the few Relevant Representations that were formally reviewed, it appears that the Applicant has responded to the perfectly valid arguments that were put forward by simply reiterating its original position as if that were proof that its comments were correct in the first place. This is a mere dismissal of the arguments, not a rebuttal and, although the PC is grateful to the Examining Authority (ExA) for providing this opportunity to respond, if the Applicant is just going to dismiss everything in favour of restating its original position, there seems little point in playing any further rounds of "Adverse Impact Ping Pong", particularly as parish councillors are volunteers without access to resources and it is considerable time and effort wasted when carefully compiled submissions are simply dismissed. This being the case, the PC will just have to be content with making some more general comments for this Deadline of the Sea Link DCO and in particular, would like to focus again on the needs case for Sea Link as well as National Grid's clear underestimation of the wide-reaching severe adverse impacts that will surely result from development of the Suffolk end of Sea Link at Saxmundham. It would also like to expand on the considerable adverse cumulative impacts and total loss of planning balance in East Suffolk at the moment that is impacting very badly on the human beings on the receiving end of it all.

When the Bawdsey to Bramford cable route cables were switched from DC to AC and the cable route's transmission capacity was therefore downgraded, the Scottish Power EA1N and EA2 substations that could not connect at Bramford after all were offered connection in the "Leiston area" on the basis that there was spare capacity in the grid for this. The National Grid connection point was awarded consent on the back of these Scottish Power projects and as soon as this was obtained, despite the ExA's concerns that it would only just be possible to mitigate for the development, Nautilus and Lion Link were given permission to connect at the connection hub and grid capacity was almost immediately exceeded. This created a retrospective need to transfer the excess power from the Sizewell area to where the demand is in the Southeast which was satisfied by the proposals for Sea Link. Now that Nautilus is going to Grain however, Sea Link's needs case has changed significantly, but despite the ExA's

warnings regarding the cumulative impacts of connecting further projects at Friston, National Grid seems to be ploughing on nonetheless and is seeking to create a new and different needs case to the one that the original Sea Link application was based on. This is a disingenuous retrospective planning approach that seems to be proceeding without taking the considerable cumulative impacts, the socioeconomic and environmental costs or the wellbeing of the local community into account at all.

The PC would like to reassert its view (as stated in its RR) that the choice of the Saxmundham site for development of the converter stations has been fundamentally flawed right from the start because the site is too close to the local residents of Saxmundham and is basically inaccessible without causing excessive disruption to the wider local community. Local residents that use the B1121 as it passes through Benhall are well aware that, as a small B-road which has multiple low visibility turnings onto it, it is totally unsuitable for use as the main access route to the Converter Station site, but this problem has been completely underplayed in the Sea Link documentation. Junction sensitivity hasn't been formally assessed at any of the difficult turnings along the B1121 which are already becoming increasingly challenging with the noticeable rise in vehicle numbers using this stretch of road in order to avoid the nearby Sizewell C (SZC) road works. National Grid's underplaying of the severity of adverse impacts that construction of Sea Link will surely cause along the B1121 in Benhall was also clearly evident when consultation regarding the access routes was carried out because even though the Applicant was fully aware of the difficulties associated with crossing the Benhall Railway Bridge, this information was withheld meaning that the proposals presented at the time did not provide an accurate representation of the actual situation and which calls the whole validity of the consultation process into question.

The PC would once again like to emphasise the extreme stress that the local population is experiencing in the face of the overwhelming amount of infrastructure development taking place in East Suffolk currently. With the SZC project in construction, this region's electrical infrastructure burden is already at full capacity and we cannot take the strain of any more NSIPs being forced in on top of this. Take the effect of so much major infrastructure development on our local road network for example. There were 5 collisions within 9 days at the SZC roadworks at the Friday Street roundabout in Benhall recently as well as at least 3 serious accidents on the nearby A12. The slightest problem with traffic flow locally quickly results in extensive traffic jams with vehicles being forced onto inappropriate narrow rural sideroads which are frequently single track without passing places. Just last week – when the A12 was closed for a fatal accident – multiple HGVs were squeezing past other vehicles through the narrow streets in Saxmundham resulting in hours of traffic chaos. This does not bode well for the increase in traffic flows that will be seen with the construction of Sea Link and endorses the PC's view that the Saxmundham site isn't a practical proposition for development of such large-scale infrastructure.

A single DCO would create a considerable workload for county, district, town and parish councils, but the Sea Link DCO is being considered alongside the huge workloads generated by Local Government Reorganisation as well as construction of the twin nuclear reactors at SZC and the EA2 substation at Friston which will of course shortly be followed by development of EA1N and the National Grid connection hub. At the same time, the local area is faced with the Lion Link DCO examinations which are due to begin whilst the Sea Link examinations are still going on, development of almost 1,000 houses and an industrial retail unit, proposals for 250MW and 600MW solar parks which together will cover an area in excess of 3,500 acres locally and Suffolk Water's Recycling, Transfer and Storage DCO that has just been announced which has a desktop study putting new water pipes right through the proposed converter station site! There is only so much that people at all levels of local government can manage to deal with – both in terms of impacts and workloads – and the local community is already paying the price for corners being cut and problems not being adequately dealt with.

In conclusion, the PC is of the opinion that development of one, two or maybe even more converter stations at the Saxmundham site is not a viable proposition because site accessibility is too problematic, the burden of development on the local community is too great and the region is already under excessive development duress. The bottom line is that there are simply too many NSIPs concurrently being developed or being proposed for development in East Suffolk at the moment and the socioeconomic and environmental costs of proceeding with them is simply too great a price to pay. There is an urgent requirement to address the total lack of planning balance we are being faced with because, if not, the cumulative impacts of more and more infrastructure development in one small area risk becoming so severe that they threaten to cause unnecessary, avoidable and disproportionate harms to the local community that will be completely impossible to adequately mitigate or compensate for.