

Benhall and Sternfield Parish Council – Submission for Sea Link Deadline 3a

in Response to the Change Request Document

Benhall and Sternfield Parish Council (the PC) confirms that this report – as with all the other reports submitted to date during the Sea Link DCO – has been prepared without the use of AI.

The PC remains extremely concerned that if all the numerous major infrastructure projects that are currently being proposed for development in East Suffolk proceed, the cumulative impacts will become overwhelming. This will impose an unfair and disproportionate burden on the local population and the PC therefore continues to hold a position of in principle objection to the Sea Link Project on the grounds that the scale of harm and level of expenditure required to proceed with construction of the converter station at the Saxmundham site are too great. The bottom line is that the project must not be allowed to proceed at the expense of the local community and a less harmful and cheaper option to meet the same need should be actively sought instead.

In view of the excessive cumulative impacts that so many NSIPs threaten to impose on East Suffolk at the moment, any project mitigation should be of a scale that attempts to match this infrastructure burden providing tangible, meaningful, lasting environmental and community benefit. In relation to Change 2 of the Change Request Document, the PC therefore maintains that the hard-won mitigation secured during the EA1N and EA2 DCO examinations should not be diluted, undermined or compromised in any way and that, however consent is achieved, any previously granted mitigation should be implemented as originally agreed.

Difficulties with transporting 300 tonnes AILs over the 46 tonnes weight-restricted Benhall Railway Bridge were not considered until after the DCO application had been accepted and then only in response to pressure from SCC and ESC. The Rochdale Envelope principle of disclosing the worst-case scenario was thus not adhered to and rather than addressing the problem with Benhall Railway Bridge during the consultation stage, the issue was dismissed as being a matter to be dealt with after consent had been granted. This means that the issue was misrepresented because, had the full picture been disclosed before the application was submitted, the local response would have been very different. It is not fair to say that the local response to the information being presented now is the same as it would have been had it been disclosed at the proper time when people were considering whether or not to become an Interested Party because the whole region is currently suffering from considerable infrastructure consultation fatigue and most people are thoroughly confused about what is actually going on and are not prepared to engage in the same way now as they would have been before. This raises questions about lack of transparency, non-compliance with planning procedure, inadequate consultation and lack of procedural fairness.

Even though the difficulties with Benhall Railway Bridge are now being addressed in the change document and two solutions to the problem – Option 1 and Option 2 – have been presented, many details and specialised expert opinions are still lacking and it is not clear

whether or not it will actually be possible to implement either option. The PC would like to raise the following points in relation to this issue:

- When the Benhall Railway Bridge issue was first raised, there were three options on the table, but Option 3 had to be withdrawn because the availability of the large field next to the bridge has been removed. Now that this land is no longer available for storage of the 'mini-bridge' as proposed in Option 1, it is not clear from the documentation whether it will be possible to store this 'mini-bridge' locally or whether it will be necessary to transport it further afield each time it is required which would of course result in longer road closures.
- An adequate temporary compound is required for use during work to strengthen the bridge as proposed in Option 2, but now that the land next to the bridge is no longer available, it is not obvious how National Grid is proposing to carry out the work without it. In addition, the little track to the Southwest of the Bridge which provides access down the embankment to the railway track itself has not been included in the new order limits, but will surely be required should Option 2 be chosen. Both these points cast doubt on the viability of this option.
- Both Options 1 and 2 will lead to repeated and/or prolonged road closures and this presents a real problem for the local community which is already seriously adversely impacted by road closures for development of SZC and the Scottish Power substations. When the A12 was closed in Benhall over the weekend of 10th/11th January for SZC works at the Friday Street Roundabout, there was chaos on the constrained rural road network with extensive delays and hundreds of vehicles traversing completely inappropriate sideroads. The official A-to-A road diversion did not provide a viable alternative route for local people to follow and it is inevitable that when there are road closures locally, inappropriate sideroads will be used resulting in significant disruption for the local community. This has become a frequent recurrence and there is a limit as to how much can be endured.

This photograph was taken during the weekend of January 10th/11th:



- Specialised plans are not available for either option and 'loose' narrative such as the requirement for "*minor*" repairs which will be "*reasonable for National Grid to implement*" means that it is not possible to ascertain how extensive the repairs required with Option 2 will actually be or how long they will take.
- Network Rail is uncompromising in what permission it will grant for work near to or on the railway and this could potentially make both Option 1 and Option 2 impossible.
- SZC has not confirmed how closures associated with work on the railway will impact deliveries to the SZC site via the Green Rail Route and whether or not this would compromise the feasibility of either option.

The possibility that neither Option 1 nor Option 2 provides a viable solution to the Benhall Railway Bridge problem just endorses the PC's original view that the choice of the Saxmundham converter station site has been fundamentally flawed right from the start because the site is too close to the local population and accessing it will result in unacceptable disruption to the local community.

