

## Benhall and Sterfield Parish Council's Submission for Deadline 4 of the Sea Link DCO

Following the escalation of Sea Link to National Priority status in response to what most people feel is a completely unrealistic ambition to decarbonise the grid by 2030, the Sea Link DCO is now being driven through with such great urgency that consideration of the extreme adverse impacts of imposing such major infrastructure right next to the local population has plummeted to a minimal level of importance. This is very concerning for the local community which is already experiencing significant Human Impacts associated with the beginning of construction at SZC and is fearing the very real Human Cost of the cumulative impacts that will inevitably ensue if all the multiple infrastructure developments in East Suffolk are allowed to progress.

Formulating long-term strategic plans to deliver the best infrastructure possible at the lowest cost and with the fewest adverse impacts is surely preferable to delivering electrical infrastructure as quickly as possible and regardless of environmental and socioeconomic adverse impact, but the latter approach has been adopted in order to achieve the immediate delivery of Sea Link. This short-sighted approach to delivery needs to be considered alongside the evolutionary process that has led to Sea Link's meteoric rise to critical infrastructure from its original position of 'only-just consented third-party transmission infrastructure' because the new position seems to have been arrived at by stealth rather than by transparent long-term planning based on need and deserves examination:

- The entire output from all Scottish Power's (SPR) North Sea offshore windfarms was originally due to be transmitted to a preexisting National Grid (NG) connection hub at Bramford, but a cost-cutting decision to downgrade the onshore cable route meant that only the electricity from two of the windfarms (EA1 and EA3) could be transmitted to Bramford after all.
- In order to serve the other windfarms (EA1N and EA2), SPR submitted proposals to develop two substations at Friston and plans for a brand-new NG connection hub – specifically to connect SPR's electricity to the grid – were incorporated within this application.
- Substantial adverse impacts were identified with the SPR project and since it was deemed by the ExA that it was only just possible to mitigate for these, caution was advised were further projects to be connected at Friston in the future. (NB This caution was advised long before anyone had realised just how impactful construction of SZC was going to be).
- Towards the end of 2024 it was revealed at an ESC planning meeting that SPR might not proceed with development of its substations at Friston after all. Having been awarded consent specifically to connect SPR's electricity to the grid and only on the back of the renewable nature of the SPR projects, this revelation cast doubt on the validity of the NG connection hub's consent because it didn't look like it stood up without the SPR substations.

- SPR may indeed not be proceeding with development of its substations and yet NG is proposing to develop the connection hub at Friston as part of the Sea Link DCO.
- Furthermore, since Sea Link will provide a sea link capable of transmitting electricity out of East Suffolk to Kent, it has the potential to open the floodgates to more and more electrical infrastructure projects being connected at the NG connection hub in the future.
- Thus, despite the fact that the requirement for the NG connection hub at Friston arose out of a need to correct a poor, short-term planning decision (some might say mistake) and despite the ExA's warnings that care should be taken when connecting further projects at Friston in the future, one small geographical area is now being faced with overwhelming cumulative impacts from an unreasonable and disproportionate imposition of major infrastructure that threatens to, amongst other things, severely impact local people's health and wellbeing.

During the CAH and ISH 2, it was evident on multiple occasions that the Applicant was presenting the adverse impacts of Sea Link in isolation rather than putting them in the context of all the other major infrastructure projects currently being developed or proposed for development in East Suffolk. This resulted in information being provided that gave the unrealistic impression that Sea Link will only have minimal impacts whereas it is of course self-evident to the local population that the extreme cumulative impacts arising out of East Suffolk's infrastructure developments over the next ten to fifteen years of construction will be incredibly severe. There are particular concerns that significant problems with local people's Health and Wellbeing might develop in the face of such infrastructure duress and the Applicant cannot afford to ignore this, especially since the stress of the situation could potentially progress to an eventual reduction in local life expectancy.

During the short ISH discussion about Traffic and Transport, it was made abundantly clear by Suffolk Highways that there are many serious concerns with cumulative impacts on the local road network, but these claims were repeatedly played down or even dismissed by the Applicant and a SCC proposal during the CAH to explore a less harmful Northern approach to the Saxmundham converter stations site was immediately ruled out on the grounds that it would add extra hours to the project. It is essential that a fair balance is achieved between delivery of Sea Link and the extreme adverse impacts predicted from road closures related to transporting AILs over Benhall Railway Bridge, disruption to local residents who use the B1121 through Benhall and harm to Saxmundham's heritage assets and landscape setting from construction of the bridge over the River Fromus: The Applicant will never achieve an adequate level of planning balance if it does not actively engage with meaningful mitigation or carefully considered alternative solutions that SCC, ESC and other Interested Parties are suggesting.

At one point during the ISH, the ExA asked SCC and ESC whether any veteran trees had been felled during the SZC "de-vegging" process. The local population knew the answer to this

question: in excess of 23,000 trees were felled in a matter of weeks and this tally of course included many veteran trees. (Seeing the local landscape so dramatically raised to the ground was truly shocking and elicited a visceral response in many people).

Benhall and Sternfield Parish Council is very disappointed by the mitigation planting proposed to the south side of the converter station and considers it to be inadequate. A 26m high converter station sitting on top of the hill above the village will clearly dominate the horizon from miles around. The Applicant should of course be aiming to deliver the maximum in terms of mitigation planting and it is felt that this is an area in which a small detail of the project could easily be improved.

The effects of overwhelming cumulative impacts on the local population of so many major infrastructure projects being developed in one small area cannot and should not be underestimated. If Sea Link is developed, the Applicant must attempt to minimise, mitigate and compensate for adverse impacts – especially relating to problems with Human Health and Public Safety – and if this is not possible, it is imperative that a less harmful alternative site for development of the project be identified.