

## **Benhall and Sternfield Parish Council's submission for Deadline 7 of the Sea Link DCO**

Benhall and Sternfield Parish Council (the PC) is grateful to the ExA for the opportunity to have a say during the Sea Link DCO, but is disappointed that, not only did the Applicant dismiss all the submissions that the PC made, but also that it has made so few concessions during the examinations that the majority of the Sea Link documentation remains the same now as it did at the start of the DCO. It is of course a relief that working hours for Sea Link have been brought into line with those of the SPR substations, but for the local community facing ten to fifteen years of multiple major infrastructure developments, it is clear that the SPR working hours (as well as the other SPR mitigation measures that were hard-won during the SPR substations' DCOs) should have been adopted by Sea Link right from the start. That they were not is evidence that NGET has failed to embrace the extent of the stress, uncertainty, loss of amenity, anxiety and interference with people's mental health, physical health and overall wellbeing already being experienced by the local community in the face of the preposterous number of NSIPs being developed locally. No other community has ever been expected to withstand such a heavy and prolonged infrastructure burden and the human impacts of this extraordinary imposition will inevitably escalate as project after project is layered, one on top of another, on the already elevated impact baseline. All the Developers building in East Suffolk will have a duty of care to tread very carefully with respect to the human beings stuck in the middle of all this infrastructure chaos if they are to avoid the level of harm becoming so great that it causes an unacceptable interference with our human rights and activates Article 8 of the European Court of Human Rights.

The PC is extremely concerned that the large number of issues that remain outstanding now that we are almost at the end of the DCO process will result in Sea Link being imposed on the local community in its worst form. This anxiety is further compounded by NGET's recent proposal AS-167 to the DCO of document 9.154 – "Approach to adopting DESNZ requirement discharge unit for Sea Link" which will potentially give NGET the power to take control away from the local authority and put it in the hands of central government for discharge of the project instead. Throughout the Sea Link DCO, the examinations have been carried out with the understanding that the local authorities – already experienced in NSIPs and fully conversant with East Suffolk's unprecedented cumulative impact issues – would be implementing the project and shifting this control to a body which doesn't even exist yet completely undermines the whole DCO process, not to mention how it puts the Developer in an overly dominant position.

The PC's main points of contention at Deadline 7 are that:

- NGET has not given due consideration to the information provided by the local population regarding the very real health and wellbeing impacts already being experienced as a result of infrastructure development in the region.
- NGET has failed to look at Sea Link in the context of East Suffolk's unprecedented infrastructure burden and, rather than attempting to separate Sea Link out from the

impacts already being experienced from SZC and SPR, it should be adopting a precautionary approach to cumulative impacts and viewing Sea Link cumulatively alongside all the other NSIPs in East Suffolk.

- NGET has not applied the mitigation hierarchy to the access route to the Saxmundham converter stations site through Benhall and by dismissing SCC's proposals for an alternative access route primarily on the grounds of increased journey times delaying delivery of the project exposes a failure to address the considerable impact reduction that use of SCC's route would bring about.

The PC would like to examine the last of these points in the context of its longstanding aim to achieve the "least-worst" outcome from the Sea Link project for the local community. The PC has consistently commented that choice of Saxmundham for the converter stations has been fundamentally flawed right from the start because the site is way too close to the local community and is basically inaccessible without causing significant interference and undue harms. NGET's proposed access route through Benhall requires overcoming the substantial hurdles of crossing the weight restricted Benhall railway bridge and building a brand-new bridge in the Fromus Valley over the River Fromus. The route is further compromised by the fact that the turning off the A12 onto the B1121 is wholly inadequate, the little B-road through Benhall Village (which has 14 quite tricky access points onto it) is totally unsuitable for major construction traffic and any use of Saxmundham for diversion traffic is completely dysfunctional. On many occasions since 2024, SCC has expressed concerns that NGET's route through Benhall is far from certain and may even be undeliverable and this led to an alternative access route to the Saxmundham site via a Northern approach that shares the Sizewell Link Road being proposed by SCC at CAH1. If the mitigation hierarchy is applied to SCC's proposals when compared with NGET's proposed route through Benhall, many of the adverse impacts of accessing the site through Benhall would be avoided. Dismissing SCC's proposed route on the grounds that the extra hours it would take to use this longer route would delay delivery of the project is testament to the lack of understanding that NGET has for the effects of the adverse cumulative impacts on the local community from so much major infrastructure imposition in one small area. If SCC's route is employed, although it would be unfortunate that other communities might experience a small increase in local impacts, all of the extreme adverse impacts of going through Benhall would be completely avoided. SCC's route would demonstrate meaningful coordination and cooperation between Developers – frequently called for by Mrs Jenny Riddell Carpenter MP – and because construction of the Sizewell Link Road is already underway, would presumably also be a much cheaper option too. In addition, even though NGET stated during ISH3 that the SPR AIL route is certain because it has already been consented, it was reconfirmed by SPR at another SPR drop-in event on April 21<sup>st</sup> that their AIL route has not been assessed yet and is far from certain, so the question is: could SPR also employ SCC's alternative route proposals along with Lion Link and any other converter station projects in the future?

The PC is very concerned that NGET has adopted an utterly dismissive approach to the Sea Link DCO and is dismayed that any ambitions for achieving the “least-worst” project for the poor locals struggling with so much infrastructure development taking place around them have not materialised. The fear is that Sea Link will be imposed at the expense of the local community in its worst form and, if nothing else, the PC hopes that NGET will give proper consideration to SCC’s proposals for a Northern access route in order that at least some of the construction impacts on the local population might be avoided.