Benhall and Sternfield Parish Council:

Response to the Secretary of State's "Invitation to Comment"

with regard to the Sea Link DCO Application: (EN020026) "Request for Information"

Benhall and Sternfield Parish Council (the PC) is grateful to the Secretary of State (SoS) for this "Invitation to Comment" on the representations submitted in response to the previously issued "Request for Information" with regard to the Sea Link DCO application.

The PC is overwhelmed with dealing with matters arising out of the unprecedented number of major infrastructure projects being developed in East Suffolk at the moment, but since the proposed Sea Link converter station will sit in Sternfield and the proposed access route to the Saxmundham Converter Stations site will run through Benhall, the PC has taken its responsibility to represent the local community's concerns with regard to development of the project very seriously. It has spent an inordinate amount of time and effort actively engaging with the Sea Link DCO and has been very diligent in presenting submissions based on informed lived experience and local knowledge. Unfortunately though, it is clear from NGET's "Closing Summary Statement" (EN020026-003595-9.145) at the end of the Sea Link DCO examinations – which basically dismissed the vast majority of the 6,042 Interested Party submissions – that instead of evaluating the PC's carefully considered challenges in the constructive way in which they were intended, the Applicant has simply referred everything back to the original impact assessment report and nothing the PC has said has even been acknowledged, let alone taken into consideration. The PC was utterly disheartened by this uncompromising approach and sincerely hopes that the SoS will take a more holistic, open-minded view of the local community's justifiable concerns when making the decision whether or not to award consent for development of this project.

The PC considers that resolution must be found for the following issues arising out of the "Request for Information" before the final DCO decision can be made:

1) That design of the converter station remains inadequate.
2) That there are still considerable problems associated with accessing the Saxmundham converter stations site through Benhall village.
3) That the harmonics issue (raised by Ofgem, but not previously disclosed by the Applicant), clearly needs to be properly resolved in order that the project doesn't end up destabilising the grid rather than reinforcing it.

These unresolved issues are obviously extremely significant and awarding consent without resolving them could have severe ramifications. For instance, the solution to the harmonics issue may mean that the as yet undesigned converter station has to be increased in size by as much as three times and that it may emit considerably more noise than anticipated. In addition, a fully viable access route is obviously fundamental to the project and if the problems associated with transporting AILs over the Benhall railway bridge turn out to be

insurmountable, it may mean that, unless alternative access can be identified, consent will have been awarded for development at a site that is basically inaccessible.

It is worth noting the following points which demonstrate the knock-on effects of repeatedly making flawed decisions:

- The need for the development of the EA1N and EA2 substations and the NGET Connection Hub at Friston arose out of poor short-term, profit-led planning decisions that reduced the amount of electricity that could be transmitted from the Scottish Power wind farms to the pre-existing connection hub at Bramford and meant that another connection point had to be identified.
- Sea Link is neither an energy producer nor does it connect directly with any source of energy generation: it is merely a subsea transmission link to move electricity from Suffolk to Kent.
- The need for Sea Link arose in order to correct a mistake that was made when connections were promised to a theoretical connection point in the "Sizewell area" (that did not exist at that time) to a pylon route that would not have the capacity to support these connections.
- The need for Sea Link to move excess electricity from Suffolk to Kent will not be realised until SZC and Lion Link become fully operational – which will not be for many years.

The PC is anxious that a project that still has so many outstanding issues should be consented before it is ready, especially when there is no immediate hurry and would urge that time is taken to resolve the problems with Sea Link before consent for development is awarded.