

**East Suffolk Communities Energy Partnership (ESCEP)**  
**National Grid Electricity Transmission – Sealink – EN020026**  
**Deadline 3A Written Representation (WR)**

1. ESCEP is a partnership of over 30 East Suffolk parish and town councils lead by a Steering Group. ESCEP seeks share knowledge and understanding to assist its members in preparing responses to NSIP applications. Individual members of ESCEP remain as IPs, where registered, but ESCEP also is an IP preparing WRs for the partnership.
2. ESCEP in preparing this WR has not used AI to prepare, edit or review any of the text herein but has used a standard non A1 Copilot Google Search for certain research as identified in the text.
3. This representation by ESCEP relates to Change Request 1 and specifically to Change 4 Benhall Railway Bridge, Suffolk which forms part of the Applicant's Change Request as set out in its cover letter of 26 November 2025 (Library Reference CR1-001).
4. The Applicant in its 9.76.2 (A) Change Request Report (Library Reference CR1-052) states in §6.1.11 *"the Applicant notes that in respect of Change 4 (new land at Benhall Railway Bridge pertaining to AILs) only temporary use powers are sought, rather than any powers of compulsory acquisition."*
5. The land shown in the Applicant's document 2.3 (C) Land Plans Part 1 of 2 Summary of Changes (Version 2, change request) (Library Reference CR1-004) on drawing reference CHANGEAPP/S/LRP/S/0117 does not include the land where temporarily use is required to access plots 7/21 and 7/26. ESCEP believe it is not the intention of the Applicant to crane, or otherwise lift down and up, plant and personnel to those plots from the B1121 highway to undertake the tasks detailed in CR1-052. The Change Request details are thus incomplete.
6. CR1-052 states that the Applicant has allowed sufficient land to enable investigations and works to permit the passage along the B1121 of AILs exceeding the current 46 tonne weight limit of the railway bridge. The Applicant states in §2.5.4 that it anticipates 15 AIL vehicle passages will exceed the weight limit and

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be “*vehicles associated with the transport of seven transformers, a piling rig and a mobile crane*”. The Applicant presents two options to achieve this aim

- installing and then removing within the B1121 highway boundary, for AIL passage, a temporary ‘mini bridge’ over the railway bridge “*in such a way as to avoid weight being placed on the bridge abutments beyond the restricted limits*”. The use of a ‘mini bridge’ is referred to in CR1-052 as Option 1.

or

- undertake intrusive investigation of the bridge structure “*to clarify the condition of the bridge and any issues experienced*” and define any remedial works that could be undertaken to bring the bridge back up to standard, presumable to loading capacity which equals or exceeds weight of the heaviest weight imposed by the Applicant’s AIL loads. Importantly this option would only be considered if “*remedial works be of a scale and programme that was reasonable for National Grid to implement*” (§2.5.7) which the Applicant referred to elsewhere in CR1-052 as “*minor repairs*”. This option is referred to in CR1-052 as Option 2.

7. ESCEP has reviewed each option.
8. Option 2 has no certainty of being a viable option. It relies upon the investigations by the Applicant not revealing the need for work which exceeds the indeterminate definition of works that the Applicant would consider reasonable to implement. Further the Applicant states in §2.5.8 of CR1-052 it requires “*establishment of a temporary compound, ideally adjacent to the bridge*” but there does not appear to be land included within the plan limits of Change Request 1 for such a compound.
9. Option 1 refers to a ‘mini bridge’ and the Applicant has indicated that the AILs will include a 74.72m long Transformer AIL AL50 Girder 12 Axial (§6.4.1 of 7.5.1.1 (B)

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Outline Construction Traffic Management and Travel Plan - Suffolk (Version 2 - change request), Library Document CR-042, which ESCEP believe will have a loaded Gross Vehicle Weight (GVW) of around 300 tonnes with at least one, but possible both sets of the loaded wheels of the low load platform being upon the bridge structure and abutment areas at any one time.

10. The chair of ESCEP, a Fellow of the Chartered Institution of Highway and Transport, is not aware of a 'mini bridge' capable of bearing such the load of even one set of wheels of a 300-tonne load and even a 'maxi bridge' which can bear around 110-120 tonnes would be inadequate. A Google search of specialist subcontractor's websites, and other technical literature, to locate a 'mini bridge' capable of bearing such loads, without imposing loads onto the existing bridge structure and abutments, has not yielded a 'mini bridge' competent enough to bear loads from a 300-tonne transformer AIL vehicle.
11. ESCEP thus consider Examiners should request the Applicant provides evidence that there is a 'mini bridge' that can do so as it is imperative to ensuring that the projected heavy AILs can safely oversail the existing railway bridge.
12. Further ESCEP has note that for Option 1 the Applicant only refers to the 'mini bridge' avoiding "*weight being placed on the bridge abutments*" but does not refer it to a 'mini bridge' avoiding applying weight to the other parts of the bridge structure.
13. If assurance cannot be obtained from the Applicant that a 'mini bridge' can be sourced to achieve the aims, then the Change Request does not provide an assured means of access for all AILs to pass safely over the Benhall Railway Bridge.
14. As a load competent 'mini bridge' has not been found in a search by ESCEP it is unclear to ESCEP if such a competent 'mini bridge' exists that the change plan limits are adequate to install and remove the bridge for each AIL passage without encroaching on or oversailing adjacent land.

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15. ESCEP has also noted that the Applicant in CR1-052 has stated in §2.5.15 that a mini bridge *“could be installed within the highway boundary and stored off site”*. It is unclear whether the reference to *“off site”* is to a facility the Applicant’s specialist subcontractor will provide outside the work areas, and thus auspices of the Applicant, or whether it is to a location provided by the Applicant for the specialist subcontractor to use for storage. If the latter there is no area Change Order delineating for such storage.
16. In §2.5.23 of CR1-052 the Applicant states in relation to Suffolk County Council’s request that *“the impact of the closures has been considered in more detail than is typical for a DCO application However, this detail has been provided given the interest from local communities and key stakeholders on the AIL solution for Benhall Bridge.”* ESCEP considers in the light of the Applicant seeking to store the “mini bridge” off site the details may not adequately define the extent and nature of road closure if the mini bridge is not disassembled to be transported on the public open highway.
17. The Applicant in its document 9.76.5.13 Change Request Appendix M Additional Assessment of Proposed Temporary Road Closure (CR1-068) details the impact of road closure associated with the Change Request. ESCEP has noted the footnote to the table therein that states *“Receptor sensitivity levels remain unchanged and the above only includes receptors which are expected to be used by construction traffic, where increases in future baseline traffic are also expected following the temporary road closure”*. There has been a large number of changes for magnitude of impact from small to medium and a number of effects are now deemed by the Applicant as minor rather than negligible. ESCEP considers that the impact on the A12/B1119 junction will be greater than indicated and impact on unassessed B1119 junctions in Saxmundham, east of that junction will be considerable and above small. Further the B1119 into Saxmundham and the B1121 thence to the light controlled B1119/B1121 junction is locally of restricted width and has narrow footways in a number of places on the B1119 as well as unrestricted parking. The impact on peak time flows will be significant.

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18. Finally, ESCEP has previously raised the issue of the impact on the operation and use of the railway to enable the Applicant to have AIL passage over the Benhall Railway Bridge. ESCEP has noted the response (REP3-095) by Network Rail (NR) to Examiners ExQ1 question on this matter. ESCEP considers the response from NR confirms multiple occupations and closure will be required for activities inherent in the options presented in Change Request 1. ESCEP recommends Examiners seek to determine from the Applicant the number and time periods of closures/occupations of the railway, necessary for investigations, undertaking temporary works and AIL passage involving a 'mini bridge' over the railway. ESCEP consider this will allow Examiners to make a detailed assessment of the impact on train operators, the travelling public and Sizewell C freight traffic.