



**SUFFOLK ENERGY ACTION SOLUTIONS'**

**WRITTEN REPRESENTATION TO CHANGE REQUEST 1 (CR1)**

**SEA LINK: EN020026**

**SEAS IP:** [REDACTED]

**DEADLINE: 3A – January 19, 2026**

**Date: 19 Jan 2026**

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This document constitutes SEAS Written Representation to Change Request 1 (CR1)

**Introduction**

1. SEAS has reviewed the Applicant's Change Request in full, and we remain deeply concerned about the direction and implications of the proposed changes. Communities across this area have already endured years of uncertainty, disruption, and cumulative pressure from multiple energy projects, and any further changes must be approached with great care and clarity.
2. In relation to Change 2 (Limits of deviation for Friston (Kiln Lane) substation, Suffolk), SEAS wishes to emphasise that the mitigation secured during the EA1N and EA2 DCO examinations was carefully secured and essential. These protections were not accidental; they were the result of extensive scrutiny and community effort. SEAS maintains that they must not be weakened, diluted, or reopened through subsequent change requests.
3. Against this backdrop, SEAS has examined the proposals set out in Change 4, concerning Benhall Railway Bridge. SEAS considers and supports the detailed submissions made by Benhall & Sternfield Parish Council, Suffolk County Council's Local Impact Report, and the East Suffolk Communities Energy Partnership (ESCEP). Their analysis aligns closely with our own assessment: the Applicant has not demonstrated a workable, safe, or realistic plan for using this bridge, and the problems now emerging only reinforce the fundamental flaw in choosing the Saxmundham converter station site.

**Main Submission**

4. From the outset, the Applicant failed to assess the bridge properly. The weight restriction on Benhall Railway Bridge, and the implications for transporting Abnormal Indivisible Loads, were not considered before the DCO was submitted. This only surfaced after the application had already been accepted, and only because SCC and ESC pressed the Applicant for answers. That is not acceptable. A project of this scale must present the worst-case scenario

SEAS Written Representation to Change Request 1 (CR1) – Deadline 3A

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upfront. Instead, the Applicant treated the bridge as a minor detail to be sorted out later, raising serious concerns about transparency, consultation, and procedural fairness.

5. Even now, the Applicant has not provided enough detail to show that either of its proposed options is deliverable. The Applicant has put forward two possible approaches for getting AILs across the bridge. The first involves installing a temporary “mini-bridge” over the existing structure, and the second proposes strengthening the bridge itself. On paper these may appear straightforward, but in reality, both options rely on land that is no longer available, access tracks that are not included within the revised Order Limits, and engineering assumptions that have not been evidenced. Neither option is presented with the level of detail or certainty required for a project of this scale, and both depend on a series of permissions and possessions that the Applicant does not control.

### **Input from ESCEP**

6. SEAS has discussed with East Suffolk Communities Energy Partnership (ESCEP) technical concerns that ESCEP intends to raise in its Deadline 3A submission. ESCEP has highlighted to SEAS that the Change Request does not include the land required to access plots 7/21 and 7/26, leaving the proposals incomplete. They also observe that the Applicant has not demonstrated that a temporary “mini-bridge” capable of carrying loads approaching 300 tonnes actually exists, nor shown that such a structure could be installed and removed within the land available.
7. ESCEP further notes that the Applicant’s alternative option, strengthening the existing bridge depends on works being “reasonable” for National Grid to undertake, a subjective threshold that offers no certainty. This option also requires a temporary compound “ideally adjacent to the bridge”, yet no such land is included within the Change Request. ESCEP additionally questions the lack of clarity regarding where the mini-bridge would be stored and whether the land available is sufficient for its installation and removal.
8. Finally, ESCEP highlights that the Applicant’s own updated assessment shows several traffic impacts increasing from negligible to minor or medium, and that the effects on the A12/B1119 junction and the unassessed B1119 junctions in Saxmundham are likely to be greater than stated. They also note the absence of information on the number and duration of railway closures required for investigations, temporary works, and AIL movements.

9.

## **Summary of Relevant Points from SEAS's Previous Written Representations**

10. The Change Request also reinforces several key concerns that SEAS has already raised in its Written Representations on Traffic and Transport ([REP1-276](#)) Alternatives ([REP1-282](#)) and Cumulative Effects ([AS-038](#)). SEAS has consistently highlighted that the Applicant failed to identify, assess, or address the obvious constraints posed by Benhall Railway Bridge, despite repeated warnings from Suffolk County Council and Benhall & Sternfield Parish Council throughout pre-application engagement. SCC's January 2025 structural survey made clear that the bridge was weight-restricted and unsuitable for the movement of Abnormal Indivisible Loads, yet the Applicant proceeded as if no such constraint existed.
11. This failure has wider implications. As SEAS has previously submitted, the Applicant's inability to recognise the Benhall Bridge constraint calls into question the adequacy of its traffic and transport assessment and undermines the credibility of its site-selection process. The late switch to Saxmundham for the converter station was made without properly understanding the limitations of the access route, and the Applicant assessed alternatives as though the bridge presented no issue at all. The Change Request now confirms that this assumption was unfounded.
12. SEAS has also noted that the Applicant's approach to cumulative effects has been characterised by a pattern of minimisation and omission. The failure to address Benhall Bridge at the outset is consistent with this pattern and should make the Examining Authority cautious about accepting the Applicant's assurances at face value. This is not a marginal matter: the bridge has a 46-tonne weight limit, yet the Applicant must transport transformers weighing around 300 tonnes, plus other equipment exceeding the bridge's capacity. The Change Request does not resolve this contradiction; it merely exposes it.

## **Cumulative Effects**

13. The Change Request also highlights the Applicant's ongoing failure to address cumulative impacts and known constraints. It is extraordinary that the Applicant did not consider the obvious problems associated with Benhall Railway Bridge at the outset, given that it proposes to use this structurally restricted bridge to convey abnormal loads weighing hundreds of tonnes to the Saxmundham converter station site. Benhall and Sternfield Parish Council repeatedly raised these concerns during pre-application engagement, culminating in their

representation of 6 January 2025, and Suffolk County Council's pre-submission response in January 2025 again notified the Applicant that the bridge was structurally restricted, supported by SCC Highways' structural survey.

14. SCC made clear that it had significant concerns regarding the use of Benhall Railway Bridge as part of the access route, and that the feasibility of constructing an overbridge was highly questionable due to the geometry of the structure and its proximity to the A12. SCC also noted that the bridge was not included within the Draft Order Limits. A striking omission given the Applicant's reliance on it for AIL movements. Site access is fundamental to any project of this scale, and the Applicant's failure to identify and grapple with these issues before submitting the DCO application is deeply troubling.
15. SEAS considers there are only two realistic explanations for this failure: either the Applicant did not undertake the most basic due diligence, including reading consultation responses, or it made a deliberate decision to proceed with the DCO application despite knowing that Benhall Bridge presented a serious obstacle, intending to address the issue later through a Rule 9 change. Either scenario reflects a wider pattern in the Applicant's approach to cumulative impact and should make the Examining Authority cautious about accepting the Applicant's assurances at face value. This is not a marginal issue: the bridge has a weight-bearing capacity of 46 tonnes, yet the Applicant must transport seven transformers each weighing around 300 tonnes, plus other equipment exceeding the bridge's capacity.

## **Community Impact**

16. The community impacts are equally concerning. We have already seen what happens when the A12 is closed, even briefly. During the Sizewell C works in January, the entire rural network became gridlocked. Traffic poured onto narrow lanes, causing chaos and long delays. That was one weekend. Sea Link's proposals would mean repeated closures or prolonged closures, and local people simply cannot absorb that level of disruption on top of everything else already happening in this area. The cumulative effect of multiple, overlapping infrastructure projects is already stretching this community to breaking point. Adding further disruption without a clear, deliverable plan is not just unreasonable. It is unsustainable.
17. Suffolk County Council has made its position very clear: it is not persuaded that the bridge can be used at all. SCC has urged the Applicant to look again at alternative access routes, including the Sizewell Link Road or the B1122, and has pointed out that these alternatives may require changes to the Order Limits.

SCC also notes that the Applicant has not properly explored a northern access route via Leston Airfield and the B1119, a route that could provide a more resilient long-term solution for Sea Link, LionLink, and future projects.

18. SEAS strongly agrees with SCC's wider point: this area is becoming a major energy cluster, and access planning must be coordinated across all projects. Emergency access to Sizewell B must be protected. AIL routes must be future-proofed. Sea Link, as the first of the new projects, should be establishing a robust access strategy that others can build on. Instead, the Applicant is trying to force everything through a single weak point. A bridge that may not even be usable.
19. In answer to the Examining Authority's Question 1, Network Rail's analysis confirms just how serious the situation is. They state that railway closures may be required for investigations, for installing a mini-bridge, and for any strengthening works. They also confirm that any activity within ten metres of their boundary, or anything that oversails the railway, would require possession of the line. That means closures, disruption, and a timetable dictated entirely by Network Rail, not by the Applicant. Network Rail also makes it clear that none of this can happen without their consent, and that the Applicant would need to enter into a formal Asset Protection Agreement before anything could proceed. They even flag a potential encroachment onto their land in the Applicant's mapping.

## Conclusion

20. The analysis from the Parish Council, SCC, ESCEP, and Network Rail all points in the same direction. The Applicant has not shown that Benhall Railway Bridge can be used safely or practically, nor have they demonstrated that either of their proposed options is deliverable. They have overlooked essential land requirements, underestimated the disruption to local communities, and failed to coordinate with the organisations whose cooperation is essential for any works to proceed.
21. What is now clear is that the Applicant has not demonstrated that the Saxmundham converter station can be accessed safely or reliably. Until a credible, coordinated, and fully evidenced access strategy is produced, one that does not depend on Benhall Railway Bridge and is supported by SCC, Network Rail, and the affected communities, the Examining Authority cannot place confidence in the Applicant's proposals.

END.