

Submission in Support of Suffolk County Council's Proposed Northern Access Route to the Saxmundham Converter Station

I submit this representation in support of Suffolk County Council's proposal for a northern access route to the Saxmundham converter station, further to the discussion held at Compulsory Acquisition Hearing 1 (CAH1) on 27 January 2026 and the Examining Authority's Action Points 2 and 3. The northern route presents a credible, lower-impact and more deliverable alternative to the Applicant's preferred western access route. The evidence heard at CAH1 demonstrates that the Applicant's assessment of alternatives has been incomplete and that the northern route now requires full and transparent consideration within the examination.

During CAH1, Suffolk County Council explained that it has consistently raised concerns regarding the deliverability and environmental consequences of the Applicant's western access proposal. The Council identified two principal constraints: the inadequacy of the Benhall railway bridge for Abnormal Indivisible Loads, and the Applicant's proposal to construct a new bridge over the River Fromus. Both matters remain unresolved. The Council made clear that these constraints may render the western route either unduly harmful or not demonstrably deliverable. The Examining Authority acknowledged this position and noted that, despite the Council's repeated concerns, the Applicant had not provided a sufficiently detailed or convincing response.

At CAH1, the Examining Authority asked Suffolk County Council to provide further detail of the northern access route at Deadline 4, noting that a clear description of the alignment had not yet been set out in the examination documents. The Authority indicated that this information was required in order for the Applicant to respond appropriately and for the alternative to be assessed on its merits. This request confirms that the northern route is a relevant alternative within the scope of the examination and that further comparative assessment is now necessary.

The CAH1 discussion also revealed that the Applicant's rejection of the northern route was based primarily on journey time, distance, and assumptions regarding the availability of the Sizewell Link Road. The Applicant did not provide a detailed engineering comparison between the northern and western options, nor did it address the environmental, heritage, or landscape implications of the western route. It did not explain how the Benhall railway bridge could be made suitable for AIL movements without significant disruption, nor did it justify the need for a new Fromus bridge in a sensitive valley landscape. These omissions are material in the context of National Policy Statements EN-1 and EN-5, which require a balanced assessment of alternatives, including environmental and heritage impacts.

In addition to the environmental and heritage concerns, the western access route carries substantial financial and socio-economic implications that have not been

adequately addressed by the Applicant. Strengthening the Benhall railway bridge to accommodate AIL movements would require significant engineering works. Such works would almost certainly necessitate partial or full closure of the A12 at this location, with consequential disruption to local communities, commuters, and businesses. There is also a realistic prospect of temporary restrictions or closures on the railway line itself during certain phases of the strengthening works. The economic consequences of these interventions — including delays, diversions, reduced accessibility, and impacts on local trade and employment — have not been assessed or presented by the Applicant.

Similarly, the construction of a new bridge over the River Fromus represents a major capital expenditure, involving complex engineering in a sensitive landscape. Beyond the direct construction cost, this intervention would require road closures, temporary diversions, and long-term alterations to the local highway network. The Applicant has not provided any transparent assessment of these impacts, nor has it demonstrated that such a structure is necessary when a viable alternative exists that avoids the Fromus Valley entirely.

By contrast, the northern access route avoids these costs and disruptions. It would utilise the Sizewell Link Road, a modern strategic highway designed to accommodate heavy construction traffic, including AIL movements, without the need for major new infrastructure. It would avoid the Benhall railway bridge altogether, removing the need for strengthening works and eliminating the associated disruption to both the A12 and the rail network. It would also avoid the need for a new Fromus bridge, thereby preventing both the financial cost and the community impacts associated with such a structure.

The northern route is therefore technically feasible, environmentally preferable, economically proportionate, and more aligned with existing strategic infrastructure. It reduces construction risk, avoids unnecessary engineering interventions, and protects the landscape and heritage setting of Saxmundham. It also responds directly to the Examining Authority's concern, expressed at CAH1, that if the western route were found unacceptable late in the examination, it would be too late for the Applicant to propose an alternative. A full assessment of the northern route is therefore essential at this stage to ensure procedural fairness and to avoid the risk of an incomplete examination.

To conclude:

The examination does not yet contain a balanced or proportionate assessment of the available access route alternatives. The Applicant's analysis of the northern route has been limited, while the significant engineering, environmental, heritage, economic, and community impacts of the western route have not been fully addressed. In these circumstances, it is essential that the Applicant is required to undertake a complete and evidence-based comparison of both options so that the Examining Authority can determine the least harmful and most deliverable solution.