

East Suffolk Communities Energy Partnership (ESCEP)

Deadline 4 Written Representation

Cumulative Impact AIL routing over Benhall Bridge

ESCEP wishes to make a further written representation in additional oral presentation on cumulative impact. This written representation on cumulative impact is in relation to the transport of AIL's along the B 1121 over the weight restricted Benhall bridge to allow entry to the proposed new access road and bridge over the River Fromus.

The Applicant at ISH 2 confirmed that, if it proceeds with the temporary overbridge option, to span the Benhall bridge for all loads over 46 tonnes the temporary overbridge, or its component parts, will be transported, before and after, each placement to the compound it is proposing to the right of its access road across the Fromus valley to the north of the junction of the B1119 and B1121.

The recent consultation on LionLink has revealed that the Applicant's sister company, National Grid Ventures, also proposes to use the same route. If Sealink uses a temporary overbridge for AILs LionLink will do so and will also require the use of the same compound for storage of the temporary bridge with its construction planned to commence in 2028 and finishing in 2032, overlapping with the Sea Link construction period. Further in operation ESCEP understand that both projects will require access for further AIL loads post 2032 to maintain the operations at both the Sea Link and LionLink facilities.

The Benhall Bridge and B1121 will thus be subject to considerably more AILs passages over the construction period for the two projects, 2027 to 2032, than that required and set out for the Sea Link project construction and also during the operation of the two facilities.

In ESCEP's view this imposes a substantially greater overall adverse impact, physically and medically, on the local community of Benhall Green and Sternfield than hitherto indicated by Sea Link. It would also adversely impact essential services such as shops, medical/social facilities, access by road and rail to schools including the new Special Educational Needs (SEND) school in Saxmundham and those using Saxmundham station to travel towards, Ipswich London and Lowestoft.

Many in the local community use the B1121 on a daily basis for access to essential services such as shops, medical/social facilities and schools in Saxmundham. Further many residents and some businesses of Benhall Green have their only vehicular, wheeling or pedestrian access along the B1121. They will endure numerous and prolonged road closures for AIL passage and transporting the temporary overbridge to and from storage area to the railway bridge and this will frequently cause severely restricted access to their properties, for any deliveries, home care and emergency services.

In addition, the greater and prolonged use of the B1121 with associated road closures with a temporary overbridge will force frequent and prolonged HGV and other traffic for both Sea Link and LionLink sites, as well as all other A12 traffic wishing to access Saxmundham, to divert either via the B1119 or the northern B1121/A12 junction and through the A1121/A1119 traffic light junction which is already operating with delays

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due to inadequate capacity for current traffic levels as mentioned in Suffolk County Council's LIR (REP1-130 §11.121 and 11.122).

The B1119 is along roads through residential areas with severe restrictions in width, street parking and narrow footways, cf Suffolk County Council's LIR (REP1-130 §11.125c) bullet point 4). and it, and the B1121, through Kelsale, are along wheeling and pedestrian routes to schools cf Suffolk County Council's LIR (REP1-130 §11.125c) bullet point 5).

Network Rail (NR) in its response to ExQ1 (REP3-095) stated in relation to the railway that

'Any such closure would be essential to ensure safe access for investigations of the bridge, installation of a mini-bridge (if it oversails the railway) and any required bridge strengthening works. Further, any activities within 10 meters of the NR boundary fence and over the railway corridor would necessitate possession of the railway lines, thus leading to their closure during the works. These closures would pose a clear detriment to safe and efficient running of the railway, as well as potential service impacts.

In ESCEP's opinion this statement would indicate that for each placement and installation of the temporary overbridge (referred to as a minibridge) closure/possession of the line would be essential during

- the period the temporary overbridge is in place over the current Benhall bridge as it is, in essence, oversailing the railway and activity over the railway corridor, and
- the period of lifting and/or assembling/dismantling of the temporary bridge or its component parts and mounting such on a vehicle to transport to the storage compound as that is activity over the railway corridor or within 10m of the NR railway fence.

It is clear NR has concerns about the impact of closures and possessions on rail services, be they passenger or freight services.

Whilst the repair of the current bridge would almost inevitably require a longer period of closure than a single temporary overbridge use, frequent repeated overbridge operations would have a considerably greater impact on services, as well as the local population. There is no alternative rail route for passenger traffic south of Oulton Broad and lengthy bus replacement is the alternative currently used for closures. Access by freight traffic from north of Saxmundham would be complex with reversal of travel at Saxmundham and Lowestoft/Oulton Broad. Additionally, that line, its crossings and structures have not been upgraded to meet the requirements of Sizewell C freight traffic.

ESCEP considers the Applicant should thus be required to either agree to undertake any, and all, work required to upgrade the Benhall Bridge to allow passage of all AIL

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loads over it without a temporary bridge or to seek an alternative route for AIL loads into the Sea Link and LionLink sites, for both construction and operation, avoiding passage over the Benhall Bridge.

ESCEP acknowledges the latter is likely to result in a longer route into the site but it considers the ExA and Applicant must provide a solution that make all reasonable efforts to minimise substantive and prolonged adverse impact on the local community and those using key services in Saxmundham.