

Benhall and Sternfield Parish Council - Sea Link DCO Deadline 5 Submission:
Comments on Suffolk County Council's Proposals for a Northern Access Route
to the Saxmundham Converter Stations Site

Benhall and Sternfield Parish Council (the PC) is very concerned that, since the challenges presented by accessing the Saxmundham converter stations site over Benhall Railway Bridge were not disclosed at the statutory consultation, the community was misled and was therefore unable to provide a meaningful evidence-based response to the consultation. Had the problems with transporting super-heavy Abnormal Indivisible Loads (AILs) over the weight-restricted Benhall Railway Bridge been raised at the statutory consultation, more timely discussion regarding alternative routes could have been carried out and the true inaccessibility of the Saxmundham site could have been properly evaluated when there was still time.

Suffolk County Council (SCC) has repeatedly raised concerns regarding the harm, adverse impacts and environmental consequences of National Grid's proposed "Western" access route over the Benhall Railway Bridge and the River Fromus. These concerns are so considerable that they may render the route undeliverable and include the following issues:

- National Grid has not provided sufficiently detailed engineering reports regarding Benhall railway bridge or the new bridge due to be built over the River Fromus.
- National Grid has not justified the environmental, heritage, or landscape and visual implications of building the new bridge over the River Fromus in a sensitive, historic valley landscape.
- National Grid has not definitively explained how the Benhall railway bridge could be made suitable for AIL movements without significant disruption to local residents in the area around Benhall, Sternfield and Saxmundham.
- National Grid has not identified the true challenges presented by using the totally inappropriate and potentially unsafe route through Benhall and the impacts of that on the wider community of East Suffolk.

In view of these concerns, SCC has proposed an alternative Northern access route to the Saxmundham Converter Stations site that uses the Sizewell Link Road and then connects to the B1119 via a new connection over the former Leiston airfield. This proposed Northern route would significantly reduce community, environmental and heritage harm and would provide a more sustainable and proportionate method for accessing the site. When compared to NG's proposed Western route, the proposed Northern route would be advantageous because:

- It would avoid all the multiple problems associated with the Benhall railway bridge entirely.
- It would avoid the many problems created by construction traffic passing along the B1121 through Benhall.
- It would avoid the major traffic disruption that would occur with traffic diverting through Saxmundham during closure of the B1121 for positioning of the mini-bridge or work to strengthen Benhall Railway Bridge.
- It would avoid disruption to rail travel and Sizewell C's construction logistics during closure of the East Suffolk Railway Line for work on Benhall Railway Bridge.
- It would avoid the need for a new bridge over the River Fromus, thereby preventing significant and permanent harm to the Fromus Valley and setting of heritage assets including the Grade II listed Hurts Hall.
- It would utilise the Sizewell Link Road which has been specifically designed to accommodate heavy construction traffic, including AILs.

- It would require upgrades to the B1119 which would be a legacy benefit.
- It would encourage project coordination by promoting shared use of the Sizewell Link Road.
- It would provide a more resilient long-term access solution for future energy projects.

Shared use of the Sizewell Link Road to access the Saxmundham converter stations site also addresses the wider issue of East Suffolk's cumulative impact burden because it aligns with the principle being called for by Jenny Riddell Carpenter MP, Suffolk's Councils and the wider community that energy developers should coordinate their construction programmes rather than each project imposing its own separate avoidable burdens on local communities. This coordinated approach also extends to construction of Scottish Power Renewable's (SPR's) EA1N and EA2 substations and the NG connection hub at Friston as well because as there has not yet been any formal assessment of weaknesses along the SPR AIL route via the B1122 through Leiston – particularly regarding whether the Victorian sewer system under the B1122 will be able to withstand the weight of transformers – the certainty of this route cannot be guaranteed. Thus, in the name of minimising adverse impacts and maximising project coordination, SCC's Northern route – which coordinates with construction of SZC by sharing the Sizewell Link Road – offers a definitive access route for the SPR projects, Sea Link, Lion Link and any future electrical infrastructure projects. The route also greatly reduces or even completely avoids the disruption that construction of the Western access route would cause and therefore deserves full, transparent and evidence-based consideration.

From a community point of view - the down side of the Northern route is that adding converter station traffic to the Sizewell Link Road will of course increase the overall number of construction vehicles passing along this route which in turn will inevitably add to the impact of the SLR on the communities situated alongside it. When compared with the huge volumes of SZC traffic that will be passing along the SLR though, this increase will only be by a fairly small amount and any increase would be outweighed by the reduction in adverse impacts if the Western access route were not to be developed. The PC would like to point out here though that discussions about how adverse impacts of one route compare with those of another route is very divisive for the communities involved and instead of one community having to make comments that potentially throw other communities under the bus, we should be looking at how the Developers have thrown us all under the bus by trying to shoehorn such major infrastructure into such a wholly unsuitable, inappropriate, inaccessible location so close to a community already struggling with infrastructure duress and that a more appropriate brownfield site close to demand should be identified that doesn't carry the same problems of inaccessibility.

SCC's proposed Northern route lightens construction requirements, avoids unnecessary engineering interventions, protects the landscape and heritage setting of Saxmundham, greatly reduces community disruption, lowers environmental harm and is more aligned with increased infrastructure coordination. It therefore appears to present a credible, technically feasible, lower-impact, more deliverable and environmentally preferable alternative to NG's Western access route, but despite all these advantages, NG has rejected SCC's proposals primarily on increased journey time and distance. The PC sees this as a woeful lack of acknowledgment of the major adverse impacts associated with using the Western access route and would therefore urge that, in the context of the huge infrastructure burden currently being faced by the local community, NG acts according to the principles of avoiding and minimising adverse impacts wherever possible by giving SCC's proposals for a Northern access route proper consideration.

It is of course incumbent upon NGET to work constructively and cooperatively with Suffolk's Councils, Suffolk Highways, Network Rail, other Developers and the local community in order to ensure that access to the converter stations site can be safely and reliably achieved with

the fewest adverse impacts and that projects are not delivered at the expense of the local community and that if this is not possible, then another site will have to be identified.