

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.107: Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station

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1. Introduction and Purpose

- 1.1.1 This document has been prepared to respond to Suffolk County Council's Deadline 4 Submission [**REP4-149**] on Alternate Access to Saxmundham Converter Station.

2. Response to Compulsory Acquisition Hearing 1 (27 January 2026) and Suffolk County Council Deadline 4 Submission [REP4-149]

Table 2.1 Response to Compulsory Acquisition Hearing 1 (27 January 2026) and Suffolk County Council Deadline 4 Submission [REP4-149]

Action No.	Ref	Point Raised by SCC	Applicant's Response	Deadline
Written Summary of Representations made at Compulsory Acquisition Hearing 1 (CAH1)				
2 Section 122 and 123 of the Planning Act 2008 (PA2008)				
AP3	2.1	<p><u>Issues relating to the lack of consideration of an alternative access route to Saxmundham Converter Station</u></p> <p>To give a background, the Council stated that, as Local Highways Authority, it was not persuaded that there had adequate investigation of alternative access routes to the Saxmundham Converter Station.</p> <p>The Council noted that this issue had been addressed in the Local Impact Report paras. 11.225-11.227 [REP1-130] and its Relevant Representation [RR-5209] specifically in relation to the proposed Fromus crossing, which is in the southern access corridor to the converter station.</p> <p>In relation to the access routes to the Saxmundham Converter Station and, in particular, the issue of the use of the Benhall Rail Bridge and the use of the B1121, the position of the applicant and SCC has been maintained as an outstanding area of disagreement in the latest Principal Areas of Disagreement Summary Statement (PADSS) Item 1.1-1.3 [REP3-081].</p> <p>The acquisition of land or rights to provide an access route to the development, whether as a construction access route or as an operational access route for the future operation and maintenance of Sea Link would be capable of being the acquisition of land and rights required to facilitate the development. Also to meet the test of Section 122 Subsection 2 of the Planning Act 2008, the issue as to whether there is a compelling case in the public interest to meet the test of Section 122 Subsection 3 would depend on a range of matters, including whether there are reasonable alternatives to what has been proposed by the Applicant.</p> <p>If the Examining Authority was to conclude that what is currently being proposed by the Applicant would either cause undue harm, in respect of the proposed Fromus Crossing or is demonstrably not deliverable, in respect of the proposed use of the Benhall Rail Bridge, then it would be legitimate for consideration to be made for alternative access arrangements for the Saxmundham Converter Station.</p> <p>As have been set out in the Council's Local Impact Report and subsequent representations, the Council believes that the Applicant has not given adequate</p>	<p>This answer is provided in response to Suffolk County Council's suggested alternative route to Saxmundham Converter Station submitted at Deadline 4 [REP4-149].</p> <p>Lack of Consideration of an Alternate Access Route to Saxmundham Converter Station</p> <p>The Applicant fundamentally does not accept that there has been a 'lack of consideration of alternate access routes to Saxmundham Converter Station' or that the Applicant has not adequately investigated alternate access routes to Saxmundham Converter Station.</p> <p>As set out in Section 3.8 of Chapter 3 Main Alternatives Considered of the Environmental Statement [APP-044] three potential permanent accesses to the Saxmundham Converter Station site were originally identified as part of the statutory consultation for the Proposed Project carried out at the pre-application stage. These accesses were as follows:</p> <ul style="list-style-type: none"> • one access from the south (to the east of Sternfield); • one access from the west (from the B1121 to the south of Saxmundham); • and one access from the north (from the B1121 to the north of Saxmundham including the bridges over the Fromus and the railway). <p>The three Routes that were assessed are identified as Figure 6.4.1.3.19 [APP-206] Saxmundham Converter Station Access Options in Application Document 6.2.3.1 Main Alternatives Considered, although it should be highlighted that the access from the north assessed here is a materially different access to that suggested by SCC, which is based on use of Sizewell Relief Road / B1122 option (see below).</p> <p>The western access was initially selected as the preferred access, as it provided the shortest access to the site from the A12, was assessed to have fewer technical constraints than the northern access (which were associated with the crossing of the railway and branch line), and facilitated a permanent means of access for maintenance vehicles which the southern option could not.</p> <p>Following the identification of a number of detailed constraints for this preferred route (including the need to increase the size of the proposed bridge crossing of the River Fromus to mitigate potential effects on invertebrate populations within</p>	Deadline 5

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	<p>consideration to a northern access route to the converter station site as a means of resolving the shortcomings and issues related to the Applicant's preferred access route.</p> <p>If the ExA concluded that the proposed route was not deliverable, then the Applicant would be required to address those concerns by considering how an alternative access route could be delivered, which would likely require the consideration of the acquisition of additional land and/or rights, whether on a permanent or temporary basis, in order to undertake works to provide an alternative access route.</p> <p>This scenario would result in timescale implications, but the Council does not believe this is an issue which could be left until the ExA's final report, as, by that point, it would be too late for those concerns to be addressed by the Applicant and therefore would create practical difficulties in terms of the ExA's final recommendation to the Secretary of State.</p> <p>The Council requests that the ExA considers whether they share the Council's concerns regarding the deliverability of the preferred access route to the Saxmundham Converter Station, and if that is the case to seek a response from the Applicant to address these concerns by proposing measures that could provide an alternative access route. This would mean the Applicant would need to consider the compulsory acquisition or rights implications of an alternative route.</p>	<p>the waterbody (required by the Environment Agency); the need to avoid veteran and ancient trees along the River Fromus corridor; and that a further technical study identified the need to site the proposed bridge abutments outside of Flood Zone the location of this preferred access was moved further to the north.</p> <p>A further round of five route options were then assessed:</p> <ul style="list-style-type: none"> • the western access as described above • the northern access as described above; • an alternative southern access from the A1094 that would also serve as a construction access; • an eastern access from the B1069 contiguous with the temporary haul road for the cable; and • an access from the proposed Sizewell Link Road / B1122. <p>These are illustrated on Figure 6.4.1.3.20 [APP-206] Saxmundham Converter Station Access Options in Application Document 6.2.3.1 Main Alternatives Considered [APP-044].</p> <p>The appraisal assessed the options listed above and concluded that the western access remained the preferred option as it provides the shortest access off the A12 and minimises the amount of construction traffic on the rest of the local road network whilst providing a dedicated purpose-built access into the site which would result in fewer complications with regards to maintenance activities, any planned maintenance and undertaking of any emergency maintenance during the operational stage of the Proposed Project.</p> <p>Details of the consideration of the five alternative accesses, including the Northern Access advocated by Suffolk County Council, are set out from Paragraphs 3.8.7 to 3.8.16 of APP-044.</p> <p>The assessment of alternative accesses was carried out over a number of months at the Pre Application stage of the Proposed Project. Some of the options were subject to a formal consultation process, and the decision making was based on a suitable evidence base that considered reasonable alternatives.</p> <p>The issue of the access to Saxmundham Converter Station was also the subject of detailed further correspondence between the Applicant and Suffolk County Council. The Applicant notes that whilst Suffolk Council Council's Adequacy of Consultation Response [AoC-013] identified three key issues on which they considered the Applicant had failed to engage effectively, a consideration of alternative accesses to Saxmundham Converter Station was not one of them.</p> <p>Whilst it is accepted that other parties may prefer an alternate access route, the Applicant's view is that this is evidence that adequate consideration was given to the northern access route to the converter station site, now advocated by Suffolk County Council.</p> <p>The Applicant also notes that the ExA is invited by Suffolk County Council to consider whether what is currently being proposed by the Applicant would either cause undue harm in respect of the proposed Fromus Crossing or is demonstrably not deliverable, in respect of the proposed use of the Benhall Rail Bridge, and sets out its position below.</p>	

Action Ref No.	Point Raised by SCC	Applicant's Response	Deadline
		<p>Potential to cause undue harm (and environmental effects) in respect of the proposed Fromus Crossing</p> <p>As discussed in 15-18 of Table 2.3 SCC - Landscape and Visual of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP2-014], the Applicant acknowledges that there would be significant effects on local landscape character area LCA B4 as a result of the Fromus bridge and access road together with the Saxmundham Converter Station, as well as significant visual effects in the short term, though reducing to not significant once additional mitigation planting has established at year 15.</p> <p>With regards to cultural heritage the Applicant's view is that the Fromus crossing and access would have "less than substantial harm at the lower end of the scale" as set out in Appendix A of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP2-014].</p> <p>Deliverability of the Access Route</p> <p>Whilst noting SCC's concerns over the deliverability of the proposed Access Route, the Applicant has clearly set out in the Benhall Railway Bridge - Crossing Feasibility Study [RE4-101] that the deliverability of the Benhall Railway Bridge is achievable either by repair or overbridging, with a backup option for the AIL's via the route put forward by SPR during the EA1N / EA2's DCO.</p> <p>The Applicant's Planning Statement [AS-057] assesses the Proposed Project against national policy. Without repeating the conclusions of that document, the Applicant's view is that the impacts on landscape and cultural heritage are not sufficient – either in isolation or in combination – to justify an alternate access. Regarding heritage assets there would be less than substantial harm at the lower end of the scale, and there would be a significant effect on local landscape character in the short to medium term and a limited number of views would be subject to significant effects, again only in the short to medium term. Against this it is noted that given the 'level and urgency of need for infrastructure of the types covered by the energy NPSs' that the Secretary of State will start with a 'presumption in favour of granting consent to applications for energy NSIPs' and that this presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused (NPS EN-1 Paragraph 4.1.3). Further, the Applicant has assessed the alternate access proposed by Suffolk County Council, along with other alternatives, and the assessment shows that the Applicant's proposed access is preferable. For the reasons set out below in this response document, Suffolk County Council's alternative is inferior and impractical. Accordingly, there is no basis for Suffolk County Council's apparent suggestion that the tests in section 122(2) and 122(3) of the Planning Act 2008 are not satisfied. Alternatives, including the alternative here suggested by Suffolk County Council, have been explored and it has been found that the access proposed in the application is preferable (and deliverable). The relevant land is required for the development and there is a compelling case in the public interest for the compulsory acquisition, such that the section 122 tests are met.</p>	

Action Ref No.	Point Raised by SCC	Applicant's Response	Deadline
2.2	<p data-bbox="338 373 973 405"><u>Issues relating to Public Rights of Way (PRoW)</u></p> <p data-bbox="338 415 1430 485">SCC have raised issues regarding the impacts to the PRoW network, in particular, but not exclusively, in the vicinity of Saxmundham.</p> <p data-bbox="338 537 1442 674">The Applicant has stated in its response to ExQ1 (1TT16 [REP3-069]) that it would not be offering enhancements to the PRoW network, which the Applicant felt it was not able to do as it was not essential to deliver the project, and therefore could not exercise compulsory acquisition powers in relation to this work.</p> <p data-bbox="338 726 1469 825">In respect of this, the Council does not believe the Applicant has correctly interpreted the limiting of powers of compulsory acquisition in regards of it not being used to acquire land which does not deliver essential mitigation for a significant effect.</p> <p data-bbox="338 877 1457 1115">The Council believes that the guidance in para. 4.1.8 or in para. 2.6.6 of EN-5, both of which, in the Council's view, take a wider view of the scope of matters that can be the subject of compulsory acquisition. It is the Council's opinion, that the guidance, when using the term mitigation, is intending its use to cover all elements of the mitigation hierarchy. This would not just cover items which mitigate an impact, but also those which offset or compensate for an impact, which the Council believes would also constitute a legitimate role for compulsory acquisition.</p> <p data-bbox="338 1167 1466 1404">If the ExA finds offsetting and compensation to be necessary to make the development acceptable in planning terms, the Council would suggest that can include offsetting and compensation enhancement to the PRoW. Considering if there are impacts on one part of the PRoW network due to the construction works, which cannot be avoided, then the Council would suggest that a form of offsetting or compensation could be the enhancement of other parts of the PRoW network, within a reasonable geographic proximity.</p> <p data-bbox="338 1457 1448 1625">If the ExA was minded to agree with the Council's viewpoint regarding compulsory acquisition and the scope to include potential enhancements to the PRoW network, then this would have implications if the Applicant were to consider such works, then there would be rights issues and possible land issues which would need to be addressed if these were to be done via compulsory acquisition.</p> <p data-bbox="338 1677 1439 1848">The Council requests that if the ExA, having considered the concerns put forward, puts these points to the Applicant to respond to, the Council suggests this would need to be no later than the second round of written questions, otherwise there will not be enough time left within the Examination for the Applicant to address these points.</p>	<p data-bbox="1484 210 2522 308">Further, it should be noted that SCC's suggested Northern Access alternative would also involve compulsory acquisition, such that the choice of accesses is not between a route requiring compulsory acquisition and one which does not.</p> <p data-bbox="1484 373 2567 1062">At ISH2 the Applicant explained its view that a proposed new permanent right of way along the B1119 would represent an enhancement measure, rather than a compensation measure, as there is both spatial and temporal separation between the only significantly affected PRoW during construction (Bridleway 491/010/0) and the location and timing of the delivery of the proposed permanent PRoW along the B1119 being requested by SCC. A 75 m section of Bridleway 491/010/0 would be subject to 145 m long diversion (an increase of 70 m) during two periods of four weeks each. For the remainder of the construction period Bridleway 491/010/0 would remain open, with priority given to users over construction vehicles. During this time there will also be a temporary diversion in place along the B1119 whilst PRoW 460/023/0 is temporarily closed to allow for construction of the Saxmundham Converter Station and associated landscape planting. Details of these temporary closures and diversions were included in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio Economics, Recreation and Tourism [REP1A-005]. All temporary and permanent diversions and closures are shown on Application Document 2.7 (B) Access, Rights of Way and Public Rights of Navigation Plans [CR1-011]. The cumulative effects on Bridleway 491/010/0 were reported in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra Project Cumulative Effects [APP-059].</p> <p data-bbox="1484 1073 2567 1310">When the works are complete Bridleway 491/010/0 will be fully reinstated and will no longer be impacted by the proposed project. At the same time the temporary diversion along the B1119 would be removed and a permanent diversion put in place. The section of Bridleway 491/010/0 that would be temporarily affected by the Proposed Project is over 550 m from the temporary diversion along the B1119 at its closest point, which is also the route proposed by SCC to be made permanent.</p> <p data-bbox="1484 1320 2567 1625">The Applicant has identified enhancement measures where permissive access is proposed to be granted, and it is confirmed that the necessary land rights are already in the dDCO as applied for. The locations where this is proposed are the permanent access route from the B1121 to the Saxmundham Converter station site, and access around the proposed woodland planting around the Saxmundham Converter Station. Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk is currently being updated to include a commitment to delivering these permissive paths and will be submitted at D6.</p> <p data-bbox="1484 1635 2567 1806">It is the Applicant's view that that the level of temporary impact on Bridleway 491/010/0 is not enough to justify the scale of enhancement being proposed (i.e. the new permanent PRoW in addition to the measures agreed above (access around woodland planting and access from the B1121 into the Saxmundham site)).</p> <p data-bbox="1484 1816 2567 1917">In light of all these factors, we do not consider that the tests for compulsory acquisition in section 122 of the Planning Act 2008 would be met; it cannot be said that the land along the B1119 is 'required' (s.122(2)) or that there is a</p>	

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		compelling case in the public interest for the acquisition of the land to facilitate the proposed new permanent PRow (s.122(3)).	
Response to ExA Action Points			
2	<p>The potential alternative access route to the Saxmundham converter station is based on the one considered by the Applicant as "Sizewell Relief Road /B1122" in section 3.8 of [APP-044].</p> <p>The lower part of this route (from Theberton to the converter station site) is shown (yellow route) in Figure 6.4.1.3.20 in [APP-206].</p>	The applicant notes this description of SCC's Northern Access route and provides our response to it below.	
	<p>The upper part of the route (from the A12 to Theberton) is shown by the upper part of the Applicant's route for transformer and cable drum AILs (purple route) in Figure 6.4.2.7.3 of [APP-234]. The route shown utilises the existing B1122 as far as Theberton but if the near parallel Sizewell Link Road (which is the same as the Sizewell Relief Road) becomes available for use, this would supersede the need to use the B1122.</p>	<p>This upper part of the route shown in Figure 6.4.2.7.3 of APP-234 is the cable drum AIL route and an alternative route for the transformer and other AILs required for the Converter station works. It is not the preferred route for the Converter station AILs and is included in the documents to demonstrate that deliveries to site are viable if the Benhall Rail Bridge solutions to either repair or overbridge are not able to be used.</p>	
	<p>As regards the timing of the availability of the Sizewell Link Road, the Applicant has suggested that it is unlikely to be available at the time needed, but this contention is dependent on the correctness of the Applicant's construction programme, as to which SCC still has an outstanding concern (due to the apparent reliance on a DCO consent by Q2/2026 when the Examination will be still underway). SCC is not yet persuaded that the Sizewell Link Road will not be available for at least a substantial part of the Applicant's construction period.</p>	<p>The Applicant, irrespective of its construction programme, is unable to rely on the consent for a road which is being promoted as part of another DCO, as they do not have control over the delivery of that asset.</p> <p>The assessment of the B1122 was used under advice from SCC to not rely on the Sizewell Link Road. As a matter of principle, the deliverability of the Proposed Project cannot be based on an access route that is not yet constructed and that is outside of the Applicant's control.</p> <p>Following conversations around traffic and transport with the Suffolk Constabulary, they have made the Applicant aware that the B1122 from Yoxford to Leiston has additional restrictions placed on it such that any load over 2.9m wide requires a police escort to use this road due to the volume of traffic. This restriction is under constant review and depending on levels of traffic, this restriction may be removed or expanded to other roads in the region. This restriction on the Northern route proposed by Suffolk County Council would add additional cost to the proposed project in funding the police involvement and potentially add further time to journeys as vehicles wait outside the area to be escorted.</p>	
	<p>In its consideration of main alternatives [APP-044], the Applicant considers this route in section 3.8.11 to 3.8.16. Stated challenges for this route include potential for additional vegetation loss, concern over Sizewell C's Saxmundham level crossing improvements clashing with Sea Link's programme and the route being in the vicinity of Grade II listed buildings. The summary of appraisal of these options in paragraph 3.18.18 also mentions the longer travel time and increased emissions were this route used.</p>	<p>The Applicant has considered several potential impacts including programme, traffic and transport, and ecology as stated in the SCC response and has quantified that the potential travel time increase is between 24,790 hours and 32,763 hours. This is dependent upon the split of traffic 50/50 North and South or 20/80 North and South which includes workers, staff and all deliveries. The Applicant's view is that the factors identified here represent a set of important factors that weigh against the Northern Access Route identified by SCC.</p>	

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	<p>However, the Applicant's appraisal does not consider the negative impacts and challenges of its proposed access route which need to be balanced against those of this alternative. In particular, the negative impacts associated with the proposed permanent bridge over the River Fromus and the associated works including embankments and the haul road, within the setting of Hurts Hall need to be considered and balanced against the positives and negatives of any alternative access route</p>	<p>The appraisal of all alternative accesses as described in Application Document: 6.2.1.3 Chapter 3 Main Alternatives Considered [APP-044] appraised the potential negative and positive impacts of each option.</p> <p>This appraisal took account of the potential effects associated with the bridge crossing of the River Fromus and the setting of the Grade II Listed Building Hurts Hall on the western option and balanced those against the potential positive and negative effects of the other alternatives considered which included the Sizewell Relief Road /B1122 option. For the reasons explained in paragraph 3.8.18 of Application Document: 6.2.1.3 Chapter 3 Main Alternatives Considered [APP-044] the western option remained the preferred alternative.</p>	
	<p>SCC considers this aspect of the proposed access route to be disproportionate on account of the permanent nature of the bridge despite its primarily temporary use during construction. Whilst the Applicant has indicated that an access route would also be required during the operational period for maintenance of the converter station, this would be on a very infrequent basis (see para 7.9.82 of [APP-054] and para 6.7.2 of [CR1-041]), such that there is no reason why, if the route used the B1121 and a crossing of the Fromus, a temporary bridge crossing could not be provided (and subsequently removed) for those infrequent occasions.</p>	<p>The Applicant can confirm that the Fromus Bridge is still required during the operational phase of the Proposed Project and would also have the advantage of being available to accommodate construction traffic for the decommissioning phase of the Proposed Project as well as construction traffic for the Lion Link project should that be consented.</p> <p>The provision of the Fromus Bridge as a temporary crossing would require operational and maintenance vehicles to use the B1119 and route either through Leiston or Saxmundham to reach the converter station site.</p> <p>SCC have raised concerns about the suitability of the B1119 as an access route in general and have raised concerns over the B1119/B1121 junction within Saxmundham specifically as outlined within SCC's Local impact reports (LIR) from any local authorities [REP1-130]. The Applicant shares these concerns and the provision of the Fromus Bridge as a permanent structure alleviates the need to access the site via this route.</p> <p>As set out in Application Document 9.86 (B) [REP4-241] point A2.8, the Applicant disagrees with the SCC view that the proposed access into the Saxmundham Converter Station site is disproportionate. The design approach has been robustly considered and discussed with stakeholders including SCC, ESC and an independent design panel for a substantial period of time, and alternatives robustly considered.</p> <p>There are many reasons why the access needs to be permanent through the construction and operation stages.</p> <p>Operationally, the access would be required throughout the life of the converter station for the day-to-day traffic, but also for the various future larger-scale maintenance and replacement works that may require larger vehicles, HGVs and possibly AILs. Planning maintenance and undertaking any emergency activity during the operational stage has fewer complications and risks if there is a dedicated and purpose-built access into the site, removing the need to consider the logistics of bringing large plant through Saxmundham or the other villages.</p> <p>Weekly there will be three to five staff on site each day and they would require weekly deliveries to site, regular collections of Waste from the sites waste tank and monthly fuel deliveries for the Generators. Each year one element of the site will require greater maintenance eg transformers, at this point there will be ten to fifteen staff on site and a large number of larger deliveries for one to two months. Every Five years a larger maintenance activity will take place which will involve</p>	

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		<p>fifteen to twenty staff and a large number of larger delivers take one to three months.</p> <p>Alongside the maintenance of the site, the landscaping and mitigation will require frequent visits during the early years to ensure that these element fulfil the requirements of the DCO and any failures are replaced.</p> <p>The access will also be required for the decommissioning stage.</p> <p>The Saxmundham Converter Station will be a critical part of the high voltage transmission network, and to develop a converter station without a functional and permanent operational access capable of accommodating all traffic would not be an appropriate approach to a major infrastructure project of critical national importance. It would require the access to be reinstated at indeterminate points throughout the operation of the converter station site, with associated cost to consumers, complexity, environmental impacts and risk. Furthermore, in a scenario where there was a fault requiring the access to be reinstated to facilitate necessary AIL movement to allow repair, the timescale of at least 3 months to reinstate a temporary bridge would severely compromise the Applicant's ability to swiftly enact such repair works and for the Applicant to comply with its licence requirements for the Security and Quality of Supply Standard (SQSS).</p> <p>The permanent B1121/Fromus crossing access also represents an integrated and coordinated construction and operational access with the NGV LionLink project.</p> <p>From a constructability perspective, the bridge could not be decommissioned in its entirety in any case, due to the need to retain the abutments in order to facilitate future reinstatement of the bridge as necessary. If the abutments were removed (notwithstanding the cost, complexity, and environmental impacts of doing this), the bridge could not easily be reinstated in the same place due to the buried foundations and piles that could not be removed.</p> <p>Finally, and importantly, from a design and environmental perspective a permanent bridge crossing introduces opportunities to introduce and embed a suite of architectural and design-led treatments, alongside long-term mitigation strategies, that would not be available for a temporary structure. These opportunities have been and continue to be comprehensively and robustly explored by the Applicant, in discussions with stakeholders including SCC, ESC and an independent design panel. The emerging concepts are set out in Application Document 7.11.1 Design Approach Document – Suffolk [APP-364], with a requirement being added to the draft DCO Requirement 3 to provide further reassurance on the design of the bridge (see Appendix C to Application Document 9.90: Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)).</p> <p>A permissive access route along this access from the B1121 into the PROW network closer to the converter station is also being proposed and discussed with SCC, which would provide an in-perpetuity community benefit.</p> <p>It should also be noted in the context of the SCC position that the Environmental Statement does not conclude significant effects arising from the Fromus Bridge on heritage receptors after the mitigation has been established at Year 15 in any case.</p> <p>In summary, the necessary and appropriate approach is to develop a functional, purpose-built access into the Saxmundham Converter Station site once, which</p>	

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		<p>can reflect and embed the good design principles that have been discussed with stakeholders throughout the development stages of the Proposed Project, and maintain this over the life of the asset.</p>	
	<p>The Applicant has already indicated an intention to retain rights to reinstate a construction compound in the vicinity of the Fromus crossing and such rights could be utilised to provide a working area associated with the occasional installation of a temporary bridge. SCC has detailed these concerns in various previous submissions including its LIR [REP1 130] and PADSS updated for Deadline 3 [REP3-081].</p>	<p>The reinstatement of the construction compound for the installation of a temporary bridge for significant maintenance activities would increase the works associated with each and every maintenance activity which would increase vehicle movements and construction impacts for each activity. In most cases the installation of the compound and the bridge would be the primary impact of the activity.</p> <p>The reinstatement of a temporary bridge could also be subject to seasonal restrictions based on the nature of the area of the installation therefore could delay any unplanned works.</p> <p>Further details on the requirement for a permanent bridge are covered in the point above.</p>	
	<p>The increase in travel time/distance of SCC's preferred route also needs to be seen in context: -</p> <ul style="list-style-type: none"> i. Any such increase would be a small proportion of the total travel time/distance of construction traffic during the construction of the project. ii. The Applicant is content to countenance similar travel times and distances in order for AIL traffic to be able to access the Friston substation site, as if apparent from comparing the SCC preferred route (as shown on Figure 6.4.1.3.20 of [APP-206]) with the Applicant's route for transformers and cable drums to the Friston site in Figure 6.4.2.7.3 of [APP-234]. iii. Whilst SCC would prefer that its suggested route was used by all HGV construction traffic (so obviating a need for a Fromus crossing), even if that route was confined to AILs, it would overcome the outstanding issues in relation to the use of the Benhall Bridge by weight restricted HGVs (including AILs), as discussed below, and in this scenario any additional travel time/distance would be limited to AIL movements. 	<p>The use of SCC's proposed Route would increase the overall length of the construction access route by approximately 8 km on the A12 for vehicles from the south, 6 km on B1122, 2.65 km on the haul road, 3 km on the B1119 which is approximately 17 km in total.</p> <p>This would result in additional (approximately 30 minutes each way) travel time and associated emissions, noting that this would be reduced for any vehicle approaching from the north. Works associated with the bypass and the level crossing would also introduce risks as these are third party assets and improvements and hence the Applicant would not be in control of those risks.</p> <p>The Applicant does not accept that this additional travel time and journey distance is a small addition to journey time for the large majority of construction traffic travelling to site, including site deliveries and workers safely travelling to and from site. The distances set out above indicate that the increases are very significant.</p> <p>In response to ii, the Applicant can confirm, as per the submission at Deadline 4, that the consideration of the Converter station AIL traffic via the "northern route" is a backup route, should it not be able to use the Benhall Rail Bridge and it has no intention of using this route as a general route and this has only been assessed for AIL's and cable drum movements in all of the provided traffic figures. The Applicant can also clarify that there are no intended transformer AIL loads for Friston substation in either Scenario 1 or 2.</p> <p>Whilst noting SCC's concerns over the deliverability of the proposed Access Route, as set out in the Benhall Railway Bridge - Crossing Feasibility Study [RE4-101] the Applicant is confident in its proposals for the construction access to the Suffolk converter station site.</p> <p>In response to point (iii), the Applicant is confident that as stated above in the Benhall Railway Bridge - Crossing Feasibility Study [RE4-101] that all traffic will be able to use the Benhall Railway Bridge and that the Proposed Scheme – including the proposed access – is deliverable.</p>	
	<p>A similar line of reasoning applies in relation to the impacts of crossing the Benhall Bridge with AILs, particularly in terms of traffic and transport impacts on the diversion route. This concern is amplified if repeated closures of the bridge are needed, which</p>	<p>As outlined with Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026] the Benhall Rail Bridge is one of several structures that require assessment and mitigation</p>	

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	cannot yet be ruled out, both in terms of this project and the lack of resilience provided for future projects seeking to use this access route for AILs as proposed by Lion Link in its Statutory Consultation documents. SCC has detailed its concerns with the reliance on the Benhall Bridge for the project's access route to the Suffolk converter station in previous submissions such as its LIR [REP1 130] and representation on the Change Request [REP3A-031].	for AIL movements. These assessments are required regardless of the access route proposed and form part of business-as-usual activities in the development of projects of this nature. The Applicant is working with other developers, SCC and Suffolk Constabulary on the planning for AIL movements. In relation to the points made on closures the Applicant has confirmed that there would be limits placed on the construction traffic using the B1119 from the A12 during construction when the Benhall Railway Bridge was closed for any works and that all local residents around the Bridge would have access maintained. The Applicant is working closely with Lionlink to minimise the impact on the local roads and in relation to the Benhall Railway Bridge	
	The point being made is that these considerations have not been reflected in the Applicant's appraisal of alternative access routes. In any case, SCC does not consider that the Applicant's appraisal adequately justifies rejection of this alternative without further investigation into the likely environmental effects of this alternative route. Advantages of this alternative include long term improvements to the B1119 and provision of a resilient route for construction traffic and AILs with the additional stretch of road needed for the route utilising a former runway/taxiway (Leiston airfield).	As set out above, the Applicant has undertaken a reasonable and proportionate assessment of alternative access routes, and reached a decision based on a suitable evidence base that considered reasonable alternatives, as set out in the Alternatives chapter of the ES [APP-044].	
	Conversely, it is acknowledged that use of the B1119 could have adverse implications on its use as an emergency access route for Sizewell B. However, SCC considers that this could be mitigated through adequate provision of road improvements to reduce likelihood of any delay for emergency responders and the application of similar systems as that used by SZC project, and or contribution to resourcing of Emergency Planning in Suffolk to coordinate and communicate with the Applicant to ensure they are alerted should emergency services need to use the B1119. Moreover, in the operational phase the proposed alternative could provide additional long-term resilience for emergency planning in the area due to its potential use as an alternative emergency access route for Sizewell.	SCC have highlighted additional issues over the use of the B1119 within their Local impact reports (LIR) from any local authorities [REP1-130] , citing the following issues: <ul style="list-style-type: none"> • Narrow road width in Saxmundham • On street parking in Leiston and Saxmundham causing delays • Concern over capacity and delay issues at the signal-controlled crossroads in part associated with two supermarkets in Saxmundham • Surface water flooding issue near the Saxmundham level crossing • Poor road geometry in places along the length of the B1119 with several sharp bends and narrow sections The Applicant considers that there would be a disproportionate effect on the Proposed Project, when compared with any benefits gained by the use of the B1119, considering that some of the major constraints on the emergency vehicles are the cross roads, location of the supermarkets and the narrow roads within Saxmundham which would not be alleviated by the works requested to the B1119	
		The Applicant has mitigated this concern and those additional concerns raised by SCC within Local impact reports (LIR) from any local authorities [REP1-130] by limiting the use of the B1119 during construction and operation via the use of the proposed access.	
	Therefore, in summary, whilst the applicant's current proposal is superficially attractive and highways terms, simply because it is the shortest route to site from the A12 (for the majority north-bound traffic), Suffolk County Council considers that these benefits are outweighed, by: -	As addressed through the responses above in relation to the concerns put forward by SCC: the Applicant does not agree with SCC that the harm presented by the Fromus Crossing and the works to Benhall Road over rail bridge are disproportionate and	

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	<p>i. the disproportionate harms of the Fromus crossing and the Benhall road over rail bridge routing, on the environment and communities (cite relevant contributions from SCC ESC White Arch Residents Benhall and Sternfeld PC etc etc)</p> <p>ii. The functional and consequential highways challenges of:-</p> <p>a. overbridging the Benhall Rail bridge</p> <p>b. the risks to the delivery of SZC, and the operation of the East Suffolk Line, posed by the repair and reinforcement of the Benhall road over rail bridge, including the impacts of any closure in terms of increased road haulage use by SZC Co due to the closure of the railway</p> <p>iii. That the issues at i and ii above would persist for the subsequent development of the Lion Link project, which is currently undergoing its statutory consultation and during the operation of the converter station site.</p>	<p>would argue that increasing travel times, additional haul roads, all traffic journey time and improvements to long lengths of the B1119, along with further improvements to the level crossing and the likely traffic management of the junctions around the level crossing, are more harmful and impactful to the surrounding area. The overbridging of the Benhall Rail Bridge is 'business as usual' to the contractors that the Applicant uses for transporting its plant and machinery the Applicant has confirmed with Network Rail that for this option there would be no impact on the rail line.</p> <p>For the repair option, the impact on the delivery of SZC and the impacts on the railway line would be minimised and would be sought to be arranged outside of the current known schedule of delivery where possible. The close liaison with Lionlink would also assist in to minimising the impacts of the above issues and where possible, impacts later in Sea Link's programme for deliveries could be combined with Lionlink's programme should its consent be granted.</p> <p>The preferred access route for the Proposed Project was selected following an iterative assessment process that involved a consideration of a range of relevant issues (and was not limited to highway issues). Details of constraints on the SCC Northern Access are set out below.</p>	
	<p>Whereas, an integrated access solution incorporating the Sizewell Link Road and a permanent haul road, built to a non-adoptable standard across Leiston airfield, would eliminate all three of these issues, also has the potential to provide greater resilience for emergency planning and secure a permanent strategic haul road which can reduce the impacts of future energy projects on communities and the environment.</p>	<p>For the reasons set out above, the Sizewell Relief Road /B1122 option would have limited benefits . Further, it would create the following adverse impacts:</p> <ul style="list-style-type: none"> • This access would introduce a new 2.65 km haul road from the B1122 to the B1119, which would be routed close to a holiday park and have the potential for visual and amenity effects; • Access taken off the B1122 would be directly opposite a group of Grade II Listed Buildings, albeit with substantial intervening vegetation; the access would be in proximity of Grade II Listed Buildings where it would connect into the B1119. • The access would pass through the side of the former RAF Leiston and a number of areas of that have the potential for archaeology and as highlighted by SCC below UXO on Leiston Airfield may need to be dealt with. • The Proposed Project would require additional work at the level crossing beyond what is already consented and there is a risk that the level crossing works proposed by Sizewell are either not implemented in time for the commencement of the Proposed Project or clash with the construction of the Proposed Project. • This access would require road widening and realignment of the B1119. Vegetation and trees, some of which have the potential to be ancient or veteran, would need to be removed to facilitate this widening. • This access would route construction and maintenance traffic on an additional 8 km of the A12 assuming an 80% to 20% split of construction traffic approaching the site from the south and the north respectively. The traffic would also be routed along 6 km of the B1122 routing traffic through Middleton Moor and Theberton 	

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		<p>(in the absence of the Sizewell Relief Road being in place). This access would also route construction traffic along a 3 km section of the B1119.</p> <ul style="list-style-type: none"> This access would likely require traffic control measures on the junction of the B1119 and the road crossing the level crossing along with traffic control of the level crossing and Abbey Lane where the 2.65km haul road intersects to ensure that traffic can join the B1119 safely and no traffic is backed up over the level crossing to ensure that Sizewell C trains are not delayed. <p>All of the above impacts are far greater than the mitigatable impacts of the proposed solution of the A12 and the River Fromus crossing. SCC's alternative is therefore not a proportionate, preferable, or optimal solution for access to the Suffolk converter site during either construction, operation, or decommissioning.</p>	
	<p>The risks of any rail disruption would be easier to manage, and quantify, as further work may be required only to the Saxmundham Level Crossing, therefore any potential rail disruption would be confined to the Leiston Branch Line.</p>	<p>The risks to rail traffic in using the Northern access route would not diminish as usage of that route for construction traffic would result in all traffic crossing the level crossing near the Cakes and Ale holiday park, and would also introduce the AIL traffic using the level crossing at Yoxford, even once the Sizewell link road was operational.</p> <p>The risks of interruptions to the rail network from a repair to Benhall bridge or overbridging (if that required any Network Rail interaction) would be 15 no. events as stated in the CTMP 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan - Suffolk (Clean) [REP4-061], and if you took LionLink into consideration 30 no. total events, whereas the risk of the track being damaged, the crossing being blocked or something else occurring that would affect the level crossing would be far greater due to the volume of vehicle movements interacting with the rail network.</p>	
	<p>However, the Council recognises that: -</p> <ul style="list-style-type: none"> The Saxmundham Level Crossing may require further work in addition to that which will be completed this year (2026) by SZC Co. There would be a need for the Joint Emergency Planning Unit (JEPU) to coordinate with National Grid, to facilitate the operation of the SZB Emergency Plan, to manage the implementation of both the improvement works to the B1119, and the movement of vehicles during construction and operation, as JEPU already does with SZC Co. Sufficient resourcing would need to be provided to JEPU, or towards the appropriate governance body, to facilitate this. The applicant would need to coordinate effectively with other energy developers, in particular SZC Co. There would be some tree loss along the B1119 UXO on Leiston Airfield may need to be dealt with Travel times for construction would be extended <p>Additional construction traffic would use the Sizewell Link Road</p>	<p>The Applicant notes and agrees with these constraints on SCCs preferred route.</p>	

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		<p>In conclusion, SCC remains wholly unpersuaded that the Applicant has adequately explored the comparative merits of the access options to the Saxmundham Converter Station site, and SCC considers that its preferred route remains a realistic alternative that is likely to provide a better long-term solution and would overcome the current uncertainties over the feasibility of using the Benhall Bridge for AILs, which could prejudice the delivery of the project as a whole. For these reasons SCC would urge the ExA to require the Applicant to provide a comprehensive comparative appraisal of the access options, as an urgent priority, in order that there remains scope within the Examination for the Applicant to adopt SCC's preferred route if that should be the outcome of the appraisal.</p>	<p>For the detailed reasons set out above, SCC's suggestion that the Applicant has not adequately explored the comparative merits of the access options is entirely unfounded and fails to properly engage with the assessments and evidence provided by the Applicant.</p> <p>The Applicant has engaged in two rounds of consultation over access options and has proactively engaged with SCC in relation to its suggested alternative Northern access. The Applicant's preferred route has been selected for a number of reasons as set out in Chapter 3 Main Alternatives Considered of the Environmental Statement [APP-044], including it being the shortest access route and having the shortest journey times.</p> <p>The Applicant has undertaken a comparative appraisal of the alternative accesses considered including the Sizewell Relief Road /B1122 option. This is set out in Application Document 6.2.1.3 Chapter 3 Main Alternatives Considered [APP-044]. Further, as set out in the Benhall Railway Bridge - Crossing Feasibility Study [RE4-101] the Applicant is confident in its proposals for the construction access to the Suffolk converter station site.</p> <p>The Applicant also draws the ExA's attention to policy in NPS EN-1, which provides that:</p> <p><i>"4.3.22 Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:</i></p> <ul style="list-style-type: none"> <i>• the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and</i> <i>• only alternatives that can meet the objectives of the proposed development need to be considered.</i> <p><i>4.3.23 The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development."</i></p> <p>The Applicant's consideration of alternatives complies with this national policy. SCC's proposed alternative, in addition to being inferior and impractical for all the reasons set out above, also does not present a realistic prospect of delivering the same infrastructure capacity in the same timescale, given that there is no application for development consent for it.</p>	

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