

SUFFOLK ENERGY ACTION SOLUTIONS'

**SEAS REBUTTAL TO NGET'S PROPOSED WORKS TO BENHALL RAILWAY
BRIDGE [REP4- 101] & ASSOCIATED ACCESS**

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 5 – March 10, 2026

Date: 10 March 2026

1. Introduction

1.1 This document sets out the position of Suffolk Energy Action Solutions (SEAS) regarding National Grid Electricity Transmission's (NGET) proposed construction access route over Benhall Railway Bridge, onto a newly constructed access road from the B1121, and across a new bridge over the River Fromus to reach the Saxmundham converter station site. SEAS considers this proposal technically unsound, environmentally damaging, and based on a flawed assessment of feasibility and risk.

1.2 The proposed route would impose disproportionate impacts on Benhall, Sternfield, Saxmundham and the Fromus Valley, while offering no demonstrable engineering or logistical advantage. It is a direct consequence of NGET's decision to select a converter station site that is inherently inaccessible and poorly suited to the scale of construction required.

1.3 SEAS supports Suffolk County Council's proposed northern access route, which avoids the constraints of Benhall Railway Bridge, reduces environmental harm, and provides a more credible and deliverable solution. This rebuttal also highlights the wider pattern of deficiencies in the Sea Link project, including the absence of a transparent alternatives assessment, contrary to the requirements of EN-1 (which requires applicants to demonstrate that "all reasonable alternatives have been properly considered") and EN-5 (which requires a proportionate and robust appraisal of routing and site selection). The failure to meet these policy tests has resulted in the Applicant overlooking more suitable converter station locations and lower-impact access options.

2. Change 4 – Benhall Railway Bridge, Suffolk: A Rebuttal of NGET's Feasibility Assessment

2.1 NGET's feasibility study [[REP4-101](#)] seeks to justify the use of Benhall Railway Bridge as the primary construction access route for Sea Link. The evidence presented does not demonstrate that the bridge is structurally suitable, that mitigation is deliverable, or that the associated disruption is acceptable. The assessment relies on unverified assumptions, incomplete investigations, and mitigation options that fail to resolve the fundamental unsuitability of the route.

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Uncertain Structural Capacity

2.2 The bridge is currently restricted to 46 tonnes because Suffolk County Council cannot verify the condition of the encased steel beams. NGET acknowledges that each transformer delivery would impose approximately 113 tonnes on the structure, more than double the permitted limit. No intrusive investigations have yet been undertaken, and the bridge's true capacity remains unknown. The feasibility study therefore cannot credibly assert that the bridge can be strengthened to accommodate AILs or withstand years of heavy construction traffic.

Mitigation Options Are Speculative and High-Risk

2.3 NGET presents three options: bridge remediation, a temporary "mini-bridge," and a long diversion route for AILs. None provides a reliable, low-impact solution.

- **Option 1 (Remediation)** depends on SCC and Network Rail approvals, intrusive investigations, and potentially lengthy closures of the B1121. The scope, cost, and duration of works are unknown, and the programme risk is significant. The feasibility of strengthening the bridge is unproven.
- **Option 2 (Mini-bridge)** requires a three-day full closure of the B1121 for each AIL movement, totalling around 45 days of closure. The structural assumptions underpinning this option have not been validated, and the cumulative disruption to Benhall, Sternfield and Saxmundham is not assessed.
- **Option 3 (Diversion via Yoxford–Leiston–Snape)** avoids the bridge but shifts AILs through multiple residential areas already impacted by Sizewell C. The route includes several pinch points and requires upgrading the cable haul road. It does not provide a long-term maintenance solution.

2.4 These options demonstrate uncertainty, not flexibility. A nationally significant project should not rely on a menu of untested access strategies.

Programme and Third-Party Dependencies Undermine Deliverability

2.5 NGET concedes that key elements of Option 1 depend on Network Rail possessions and SCC approvals. These are limited, competitive, and outside NGET's control. The feasibility study does not demonstrate that the required possessions can be secured within the construction programme, nor does it assess the consequences if they cannot. The suggestion of a "hybrid" approach, using Options 2 or 3 until Option 1 becomes viable would compound disruption and increase programme risk.

Community and Cumulative Impacts Are Minimised, Not Assessed

2.6 The study repeatedly downplays the disruption associated with closures, diversions, and repeated AIL movements. It does not assess:

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- the cumulative impact of Sea Link, Sizewell C, and LionLink traffic
- the effect of extended closures on emergency access, school traffic, or local businesses
- the long-term consequences of routing heavy construction traffic through Benhall, Sternfield and Saxmundham

The absence of cumulative impact assessment is a critical flaw.

A Conclusion Not Supported by Evidence

2.7 NGET asserts confidence in its proposals, yet the feasibility study shows that:

- the bridge's condition is uncertain
- structural capacity is unproven
- mitigation works are speculative
- programme risks are substantial
- community impacts are significant
- no single option is demonstrably deliverable

2.8 This is not a sound basis for a primary access route. The feasibility study does not justify the use of Benhall Railway Bridge and does not demonstrate that the proposed route is the least-harm or most deliverable option.

3. Impact Implications of NGET's Proposed Route and the Fromus Bridge Crossing

3.1 NGET's proposed access route requires the construction of a new permanent bridge, approximately 4-5 metres high, across the River Fromus, together with a new access road cut across the open valley slopes south of Saxmundham. This intervention would introduce significant environmental, landscape, heritage, and community impacts that are both unnecessary and avoidable.

Environmental and Landscape Harm to the Fromus Valley

3.2 The Fromus Valley is a sensitive corridor with ecological value. The construction of a new bridge and access road would result in habitat loss, hydrological disruption, and long-term fragmentation of wildlife corridors. The floodplain is characterised by soft ground conditions, high water tables, and heightened flood risk, all of which increase the complexity and uncertainty of engineering works. The proposed bridge would represent a major intervention with long-term maintenance liabilities and potential vulnerability to future climate impacts.

3.3 The Environmental Statement acknowledges that the access bridge would have a moderate adverse impact at Year 1 and only reduces this to minor (not significant) by Year 15. SEAS [\[RR-5210\]](#) challenges this conclusion, noting that the mitigation

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assumptions, principally planting and bunding, are overstated and do not materially reduce the visual prominence or character disruption caused by the road and bridge, even in the long term.

Permanent Harm to the Setting of Hurts Hall

3.4 The proposed Fromus Bridge and access road would cause permanent, unmitigable harm to the setting of Hurts Hall, a heritage asset whose significance derives in part from its relationship with the surrounding historic parkland and the open, undeveloped valley landscape.

3.5 The MBELC 2025 assessment (as referenced in SEAS [RR-5210](#)) concludes that:

- the new bridge and access road fragment historic parkland,
- they introduce industrial development onto previously open valley slopes, and
- they open new views of the converter station from the B1121, fundamentally altering the rural character of the area.

3.6 These impacts are not temporary. They represent a permanent transformation of the landscape setting of Hurts Hall and the Fromus Valley. The ES's suggestion that planting will reduce the impact to "minor" by Year 15 is not supported by the MBELC analysis, which finds that the scale, height, and engineered form of the bridge cannot be screened or absorbed into the landscape, even with extensive planting.

Community Impacts on Benhall, Sternfield and Saxmundham

3.7 The new access road would cut through open countryside, permanently altering the landscape character and introducing industrial traffic into an area currently defined by rural tranquillity. The associated noise, dust, vibration, and visual intrusion would have a profound effect on residents of Benhall, Sternfield and Saxmundham, particularly those living near the B1121 and the proposed access corridor.

3.8 The route would bring HGVs directly past homes, farms, and community facilities. It would also increase traffic pressure on the A12 junction at Benhall, an area already under strain from existing and planned regional infrastructure projects.

A Direct Consequence of Poor Site Selection and the Availability of Credible Alternatives

3.9 The extensive engineering required to force access into the Saxmundham converter station site, including a new bridge across the River Fromus, a new access road carved across the valley slopes, and intrusive works to Benhall Railway Bridge, is a direct consequence of poor site selection. The site is inherently inaccessible, environmentally sensitive, and constrained by heritage assets, floodplain dynamics, and proximity to residential areas.

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3.10 SEAS has repeatedly demonstrated, through its submissions [[RR-5210](#)], [[REP1-282](#)], [[REP2-113](#)] and [[REP3-142](#)], that NGET has not undertaken a transparent or robust alternatives assessment. These submissions identify a credible, lower-impact alternative at the former RAF Leiston site.

3.11 The existence of this credible alternative, underscores the avoidable nature of the harm caused by the proposed Fromus Bridge and access road. The MBELC 2025 assessment, referenced in SEAS [RR-5210](#), concludes that the proposed bridge would cause permanent, unmitigable harm to the setting of Hurts Hall and the historic parkland. This harm arises solely because NGET has chosen a site that cannot be accessed without major engineering interventions.

3.12 The need for a new bridge, a new access road, and extensive modifications to Benhall Railway Bridge is therefore not an inevitable requirement of delivering Sea Link. It is the result of a site selection process that failed to consider viable alternatives and failed to apply the principle of selecting the least-harm location, as required by EN-1, which obliges applicants to demonstrate that all reasonable alternatives have been properly examined, and by EN-5, which requires a proportionate and robust appraisal of routing and site selection. The Applicant's approach does not meet these policy expectations and has led directly to the unnecessary impacts now proposed for the Fromus Valley and surrounding communities.

4. SEAS Support for Suffolk County Council's Northern Route Proposal

4.1 Suffolk County Council (SCC) has consistently maintained, through its Local Impact Report, Relevant Representation and its Post-Hearing Submission for CAH1, that NGET has not adequately investigated or appraised a northern access route to the Saxmundham converter station. SEAS fully supports SCC's position and considers the northern route to be a more credible, lower-impact, and deliverable alternative to the Applicant's proposed access via Benhall Railway Bridge and the Fromus Valley.

SCC's Position: The Applicant Has Not Adequately Considered Alternatives

4.2 SCC's CAH1 [[REP4- 149](#)] post hearing submission confirms that the Applicant's preferred route remains an outstanding area of disagreement. SCC is "*not persuaded that there has been adequate investigation of alternative access routes*" and explicitly warns that the deliverability of the Benhall Bridge route is uncertain. SCC urges the Examining Authority to require the Applicant to provide a comprehensive comparative appraisal of access options as a matter of urgency, noting that this cannot be left until the end of the Examination.

4.3 SEAS shares this concern. The feasibility issues surrounding Benhall Railway Bridge, combined with the permanent harm caused by the Fromus crossing, demonstrate that the Applicant's preferred route is neither the least-harm option nor the most deliverable.

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The Northern Route: A Credible and Realistic Alternative

4.4 SCC's preferred northern route is based on the "Sizewell Relief Road / B1122" alignment described in the Applicant's own documents [[APP-044](#), [APP-206](#), [APP-234](#)]. This route:

- connects from the A12 via the B1122 or, if available, the Sizewell Link Road
- approaches the converter station from the north, avoiding Benhall, Sternfield and the Fromus Valley
- utilise the Sizewell Link Road
- provides a resilient, long-term access corridor for construction and AILs
- avoids the need for a permanent bridge across the River Fromus

4.5 SCC notes that the Applicant's appraisal of this route is incomplete because it fails to balance the negative impacts of the proposed Fromus crossing and Benhall Bridge works against the impacts of the northern alternative. SEAS agrees that the Applicant's assessment is one-sided and does not reflect the true comparative harms.

Comparative Advantages of the Northern Route

4.6 SCC's CAH1 submission identifies several advantages of the northern route that SEAS endorses:

- Avoids permanent harm to the Fromus Valley and the setting of Hurts Hall, which SCC describes as "disproportionate" and unjustified given the temporary nature of construction access needs.
- Eliminates reliance on Benhall Railway Bridge, removing the structural uncertainty, programme risk, and potential for repeated closures that threaten both Sea Link and Sizewell C logistics.
- Provides a resilient strategic haul road across Leiston Airfield, reducing impacts on communities and offering long-term benefits for future energy projects- ie. Lionlink.
- Reduces risk to the East Suffolk Line, as any rail interface would be limited to the Saxmundham Level Crossing rather than requiring works directly above the main line at Benhall.
- Improves emergency planning resilience, offering an additional access corridor that could support Sizewell B and regional emergency response.

4.7 SCC also notes that the Applicant already accepts similar travel distances for AILs accessing the Friston substation, demonstrating that journey length is not a decisive constraint.

Alignment with Parliamentary Concerns About NSIP Coordination

4.8 Recent parliamentary debate reinforces these concerns. In a Westminster Hall debate on 25 February 2026, the MP for Suffolk Coastal- Jenny Riddell-Carpenter,

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highlighted the cumulative burden of multiple NSIPs in the area and criticised the absence of statutory coordination between developers. She described Suffolk Coastal as facing:

- “a stack of separate, fast-moving NSIPs”
- “planned separately”
- “impacts felt cumulatively”
- “uncoordinated whack-a-mole projects”

4.9 She emphasised that there is:

- No shared corridor strategy
- No mechanism to prevent the same land being dug up twice
- No requirement to co-ordinate construction schedules
- No cumulative impact assessment at landscape scale

4.10 These observations directly reflect the problems inherent in the Applicant’s preferred southern access route, which duplicates infrastructure, imposes disproportionate harm on the Fromus Valley, and fails to coordinate with Sizewell C or LionLink.

4.11 The northern route, by contrast, aligns with the MP’s call for:

- Shared corridors
- Coordinated construction
- Reduced cumulative impacts
- Integration with the Sizewell Link Road
- Strategic planning across multiple NSIPs

4.12 Her proposed statutory duty for NSIPs to “share information, co-ordinate and co-operate on design and construction” is precisely the approach embodied in SCC’s northern route proposal.

Saxmundham Town Council’s Established Concerns and Alignment with the Northern Route

4.13 Saxmundham Town Council has, throughout the Sea Link and related NSIP processes, consistently raised concerns about the impacts of the Applicant’s proposed access route. Their published submissions show a clear pattern: the combination of works at Benhall Railway Bridge and a new bridge over the River Fromus would impose disproportionate and unnecessary harm on Saxmundham, Benhall and the surrounding parishes.

4.14 The Town Council has repeatedly highlighted that intrusive works or repeated closures of Benhall Railway Bridge would:

- Affect vulnerable residents at White Arch Park

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- Cause disruptive diversions through Saxmundham
- Risk interruption to the East Suffolk Line, which is essential for both passenger services and Sizewell C freight

4.15 They have also noted that alternative options proposed by the Applicant simply shift impacts onto Middleton, Theberton, Leiston and Knodishall, communities already under pressure from other NSIPs.

Objection to the River Fromus Bridge

4.16 The Town Council has consistently objected to the proposed new bridge over the River Fromus due to:

- Ecological harm
- Adverse effects on the setting of Hurts Hall
- Landscape and character impacts on the Fromus Valley

These concerns mirror those raised by SEAS and SCC.

Alignment With the Principles of the Northern Route

4.17 Although the Town Council will present its next formal representation in due course, its established priorities already align closely with the principles behind Suffolk County Council's northern route proposal.

4.18 The northern route, using the Sizewell Link Road and former Leiston Airfield, directly addresses these priorities and provides a coordinated, resilient access solution.

5. Conclusion

5.1 The evidence presented by SEAS, Suffolk County Council and host communities demonstrates that the Applicant's preferred access route, via Benhall Railway Bridge and a new bridge over the River Fromus, is neither the least-harm option nor a deliverable one. The route is constrained by structural uncertainty, untested mitigation, significant programme risk and permanent environmental and heritage impacts, particularly on the Fromus Valley and the setting of Hurts Hall.

5.2 NGET's justification rests predominantly on its being the shortest travel time from the A12. This narrow criterion has been allowed to outweigh far more important considerations, including structural feasibility, cumulative community impacts, environmental harm, heritage protection, emergency planning resilience and long-term strategic coordination with other NSIPs. Travel time alone cannot be the determining factor for a nationally significant infrastructure project, particularly when

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the marginal difference in journey length is small and the consequences of the chosen route are severe and permanent.

5.3 In contrast, the northern access route proposed by Suffolk County Council offers a coherent, lower-impact and more resilient solution. It aligns with the principles of coordinated infrastructure planning increasingly recognised at local and national levels, avoids the need for intrusive works to Benhall Railway Bridge, protects sensitive landscapes and provides a strategic haul corridor capable of supporting Sea Link, LionLink and future energy projects. It also reflects the established concerns of Saxmundham Town Council and the wider expectations of host communities.

5.4 SEAS has set out in its Need Case submissions [[RR- 5210](#), [REP1- 281](#), [REP2- 112](#), [REP3-125](#), [REP4- 156](#) & [REP4- 238](#)] that Sea Link, as currently proposed, is not required. The necessary reinforcement of the transmission network can be achieved through a straightforward upgrade of existing overhead lines, without the need for a new converter station at Saxmundham and without the extensive new infrastructure and landscape impacts associated with the Applicant's proposal.

5.5 Precisely because a lower-impact alternative exists at network level, it is essential that any proposal brought forward is subject to a rigorous and transparent alternatives assessment, in line with national policy requirements for least-harm design and proportionate justification.

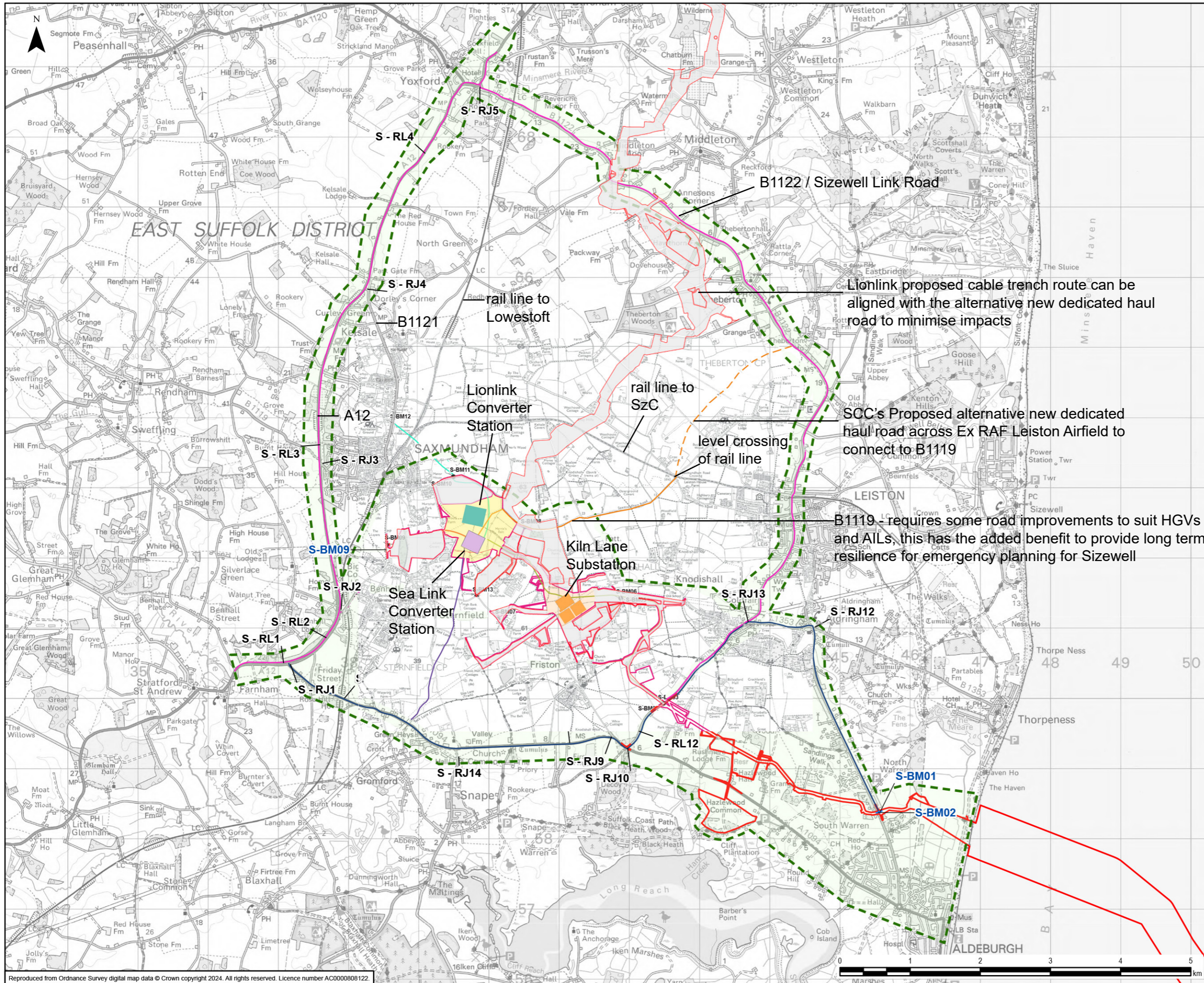
5.6 SEAS therefore submits that the Examining Authority should require the Applicant to undertake a full and transparent comparative appraisal of access options and should give serious consideration to the adoption of the northern route as the preferred access solution if, notwithstanding SEAS's Need Case, the project is taken forward. This approach would reduce harm, improve deliverability and demonstrate the coordinated, responsible planning that Suffolk communities have consistently called for, while ensuring that any reinforcement deemed necessary is delivered in the right way and in the right place.

5.7 Please also refer to Appendix A, which provides a map illustrating SCC's proposed alternative northern route, to assist the ExA.

APPENDIX A

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Legend

- Order Limits
- Traffic and Transport Study Area

Lionlink proposed cable trench route can be aligned with the alternative new dedicated haul road to minimise impacts

SOC's Proposed alternative new dedicated haul road across Ex RAF Leiston Airfield to connect to B1119

B1119 - requires some road improvements to suit HGVs and AILs, this has the added benefit to provide long term resilience for emergency planning for Sizewell

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