

Deadline 7 Submission

Summary Statement by **Gordon Young** (Affected Party Ref: [REDACTED])

1. Introduction

I have participated throughout this Examination, including through my Relevant Representation, Written Representations, responses to Change Request 1, and oral submissions at hearings ([RR-1866](#), [PDA-080](#), [REP1-294](#), [REP1A-106](#), [REP2-081](#), [REP3A-079](#), [REP6-208](#), [REP6-278](#)).

My submissions have addressed a consistent set of concerns, including site selection and proximity to residential receptors, compulsory acquisition and effects on residential amenity, access and traffic deliverability, including the use of Benhall Railway Bridge, cumulative impacts and community effects, and procedural and evidential matters arising during the Examination.

I am grateful for the Examining Authority's detailed and persistent questioning, which has assisted in testing the robustness of the Applicant's case. However, despite this process, a number of fundamental matters remain unresolved.

In my view, these outstanding issues go directly to the core considerations of deliverability, site suitability, adequacy of assessment, and the proportionality of impacts, and should therefore be afforded substantial weight in the Examining Authority's recommendation.

2. Access and Deliverability

The proposed reliance on the B1121 and Benhall Railway Bridge remains uncertain and insufficiently evidenced. The Applicant has not demonstrated a clear or deliverable solution for accommodating Abnormal Indivisible Loads, nor has it provided a robust assessment of the extent and duration of disruption associated with potential interventions.

Access is a fundamental requirement of the Scheme. The current position indicates that the proposed development is dependent on uncertain and potentially high-impact engineering solutions, the implications of which have not been fully resolved within the Examination.

A credible alternative has been identified by Suffolk County Council in the form of a northern access route utilising the Sizewell C Link Road. This approach would avoid reliance on the railway bridge and remove the need for a new crossing of the River Fromus. The limited consideration of this option raises concern in relation to the application of the mitigation hierarchy and the expectation within national policy to pursue coordinated and less harmful solutions.

3. Site Selection and Alternatives

The access constraints identified above arise directly from the choice of site. The Saxmundham location appears to require substantial and intrusive interventions in order to function, including a new river crossing within a sensitive landscape and heritage context.

The Applicant has not demonstrated that this site represents the most appropriate or least harmful option. In particular, the removal of Nautilus from the original project cluster represents a material change in circumstances that has not been followed by a meaningful reassessment of alternative siting options.

In the absence of such reassessment, there remains uncertainty as to whether the current proposal reflects an optimal or proportionate solution when compared to reasonably available alternatives.

4. Design and Environmental Assessment

There remains a lack of sufficiently detailed design information for both the converter station buildings and the proposed Fromus bridge. This concern has been consistently raised throughout my submissions, including in relation to the difficulty of assessing impacts on residential amenity and landscape setting.

Without credible and clearly defined design parameters, it is not possible to undertake a robust assessment of landscape and visual effects, impacts on heritage assets, or the likely effectiveness of mitigation measures. This represents a material evidential gap within the Application.

The Examining Authority is therefore being asked to reach a recommendation on infrastructure of considerable scale and permanence without a clear understanding of its final form or its full environmental effects.

5. Need Case and Changed Circumstances

The Applicant has not revisited the need case following the removal of Nautilus, despite this representing a material change to the strategic context of the Scheme.

In the absence of updated analysis or a reconsideration of alternatives, there remains uncertainty as to whether the Scheme, in its current form, represents the most appropriate means of meeting the identified need. The cumulative and coordinated context of infrastructure delivery in this area raises legitimate questions as to whether lower-impact or more strategic alternatives may exist.

This limits the ability to conclude with confidence that the proposed development is justified in its current form and location.

6. Governance and Requirement Discharge (AS-167)

The Applicant's late submission (AS-167) introduces a revised approach to the discharge of requirements, including the potential role of a centralised unit within the Department for Energy Security and Net Zero in place of, or alongside, local planning authorities.

This is not a minor procedural refinement. It represents a material and fundamental change to the governance of the Scheme, altering how the Development Consent Order would operate post-consent and transferring decision-making powers away from democratically accountable local authorities. As has been identified by other Interested Parties and Suffolk County Council, this change goes to the heart of how the project would be regulated and controlled.

The proposal is also characterised by a lack of clarity and definition. The suggested DESNZ unit does not yet exist, and there is no information regarding its statutory basis, decision-making processes, safeguards, or accountability mechanisms. In the absence of such detail, it is not possible to conclude that the proposed arrangements would provide an equivalent or effective level of oversight to the established system.

The timing of AS-167 raises further concern. Its introduction at Deadline 7 has limited the opportunity for proper scrutiny and has not been supported by consultation or evidence proportionate to the scale of the change proposed. A proposal of this significance should have been presented at an earlier stage of the Examination to allow full and transparent testing.

There is also a clear risk that the proposed approach would weaken effective oversight of detailed design, mitigation, and construction impacts. Local authorities play a critical role in ensuring that commitments made during the Examination are properly implemented and enforced, particularly in relation to site-specific and cumulative effects. The removal or dilution of this role introduces a real risk of reduced scrutiny and accountability.

No compelling evidence has been provided to demonstrate that the current system for discharging requirements is inadequate, or that the proposed alternative would deliver improved outcomes. In the absence of such justification, the proposal appears to introduce additional uncertainty rather than resolving any identified issue.

Taken together, AS-167 constitutes a material late change, lacking in clarity, evidence, and proper scrutiny, and which would fundamentally alter the governance of the Scheme in a manner that reduces local accountability and confidence in post-consent control.

In these circumstances, I respectfully submit that AS-167 should be rejected in full and should not form part of any recommended Development Consent Order

7. Cumulative Impact and Community Effects

The Scheme must be considered in the context of multiple concurrent NSIPs affecting the same locality, including Sizewell C, EA1N and EA2, and the proposed LionLink project.

The cumulative effects are likely to extend over a prolonged period and to interact in ways that are not purely additive. This has implications for the capacity of local infrastructure, the resilience of the area, and the wellbeing of affected communities.

In my view, the cumulative impacts have not been fully or robustly assessed, particularly in terms of how they would be experienced in practice over time.

8. Conclusion and Recommendation

Having regard to the matters set out above, I consider that the Application is characterised by unresolved uncertainties in relation to access and deliverability, a failure to properly assess reasonable alternatives, insufficient design information to support a robust assessment of impacts, and a need case that has not been revisited in light of material change.

In addition, the Applicant's late submission (AS-167) introduces a fundamental and unjustified change to the governance of the Scheme, which has not been properly examined, lacks clarity and evidential support, and would materially reduce confidence in the effectiveness of post-consent controls.

Taken together, these matters indicate that it has not been demonstrated that the Scheme is appropriately sited, fully assessed, or justified in its current form, nor that the balance between identified national benefits and local impacts has been clearly and convincingly established.

In these circumstances, I respectfully submit that the Examining Authority cannot be satisfied that the relevant statutory and policy tests for the granting of development consent have been met. The Scheme should therefore not be recommended for consent, and AS-167 should be rejected in full.

For the Secretary of State, the key consideration is whether the identified national benefits of the Scheme clearly and convincingly outweigh its adverse impacts, and whether those impacts have been robustly assessed and minimised through the proper consideration of reasonable alternatives. On the evidence before the Examination, significant uncertainties remain in relation to access, design, alternatives, cumulative effects, and governance. In my view, these matters prevent a clear and confident conclusion that the Scheme represents a proportionate or justified means of delivering its objectives, and consent should therefore not be granted.