

By Email

Sarah Holmes
Lead Member of the Examining Authority
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Our Ref
BG/10740813

Your Ref
EN020026

Date
7 October 2025

Dear Ms Holmes

Planning Act 2008 – Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 6

Application by National Grid Electricity Transmission (NGET) for an order granting development consent for the South East Anglia Link (Sea Link) Project Response to Rule 6 Letter by East Suffolk Council – FA3A16664

This response to your Rule 6 Letter is submitted on behalf of our clients, East Suffolk Council ("ESC").

Attendance Generally

Our client ESC is one of the two principal local authorities that will be impacted by the Sea Link Project in East Suffolk – the other being Suffolk County Council ("SCC"). To this end, we have completed and submitted the "event participation form" and it is our intention to attend the Preliminary Meeting (PM), Open Floor Hearings (OFHs) and all of the Issue Specific Hearings (ISHs) either virtually, or in person.

Our attendance does not of itself mean that ESC will be making formal representations at any given hearing but it is considered that ESC's attendance may be of assistance for the Examining Authority should it have any questions for the Council.

Throughout the examination, acting on behalf of ESC will be –

- Mark Westmoreland Smith KC, instructed on behalf of ESC by –
- Clyde & Co LLP, through partner Brian Greenwood.

The ESC Project Manager for the Sea Link Project is –

- Grahame Stuteley; with

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- Clara Peirson

More specifically in this context –

a) Preliminary Meeting

ESC will attend the Preliminary Meeting but does not intend to make any formal statement or representations apart from assisting the Examining Authority (ExA) as appropriate with regard to–

- o Agenda Item 3: Initial assessment of principal issues;
- o Agenda Item 4: Draft examination timetable; and
- o Agenda Item 5: Procedural decisions.

b) Open Floor Hearings

ESC intends to attend all of the Open Floor Hearings held in East Suffolk but will not be making any formal statements or representations, again attending in order to be of assistance to the ExA as appropriate.

c) Issue Specific Hearings

Whilst a great deal will depend on the topics selected for any Issue Specific Hearing, ESC anticipates at this stage, that it will be present at all ISHs, but not necessarily to make formal representations/submissions.

Draft Examination Timetable

ESC recognises the complexity of programming an examination which effectively falls into three separate and distinct geographical parts. That said, the Council does have one or two concerns with the draft timetable as currently drafted and would welcome the ExA's views, namely:

- a) As currently drafted ESC does query the practicality of scheduling the Preliminary Meeting for just a few hours in the morning of Wednesday 5 November and proceeding to the first Open Floor Hearing in-person at Snape Maltings in the afternoon. Bearing in mind the potentially numerous Interested Parties involved, ESC does query whether it might be better to schedule the Preliminary Meeting for Day 1, Wednesday 5 November, and Open Floor Hearing 1 for the following day, Thursday 6 November. That would also assist in terms of practicality bearing in mind that some parties attending the Preliminary Meeting virtually may wish to attend Open Floor Hearing 1 in person at Snape Maltings, Suffolk – which could lead to travelling difficulties between the PM and OFH1.
- b) ESC does query whether the timescales for written responses over the Christmas period are a little short. Annex D of the Rule 6 Letter contemplates the ExA's First Written Questions on Wednesday 17 December 2025 – but responses are required by Wednesday 7 January 2026. Of the fifteen working days available over the Christmas period, three will be lost to Bank Holidays. ESC would hope the ExA would agree to extend the response period to the following Wednesday, 14 January 2026.

- c) ESC is also concerned with regard to the approach suggested for the hearings later in the timetable which it is noted are intended to “*be held in a central location or virtually rather than in Suffolk or Kent*”, given the overwhelming number of representations submitted from local people within its local area. Whilst fully acknowledging the logic of the suggestion, ESC is concerned to ensure that local Interested Parties would not be disadvantaged by the need to travel potentially very considerable distances (incurring significant travel costs) to attend the hearings in person, when a more inclusive and accessible means to facilitate this complex examination would indeed be via virtual hearings or in person, for East Suffolk issues, at the Snape Maltings. Indeed, the same applies to attendance by ESC’s own specialist officers at hearings, and the imperative not to waste the Council’s time and resources bearing in mind that ESC’s officers are having to deal with their normal day to day duties whilst at the same time, are having to monitor, co-ordinate and regulate a vast number of overlapping NSIPs - consented, at examination or pending. In person hearings would ordinarily be ESC’s preference for the examination but ESC recognises the complexity for this examination posed by the geographical split of the Sea Link Project between Kent and East Suffolk. ESC would, therefore, support an approach of either:
 - (i) taking a combined approach of in person hearings relating to matters which affect only East Suffolk or which affect only Kent at venues within the relevant county, combined with virtual sessions for ISHs on matters affecting both counties; or alternatively
 - (ii) hosting all ISHs virtually.
- d) A final point is that ESC would hope that the agenda for each ISH could be published as early as possible to enable time for the relevant experts to programme availability.

Statement of Common Ground (SoCG)

An initial SoCG is currently the subject of discussions with the Applicant, SCC and ESC. At present the draft is overlong and repetitive and incorporates the comments of both ESC and SCC. It has been agreed with the Applicant that two SoCGs will now be submitted, one for ESC and one for SCC which it is hoped will reduce repetition – and length. The ExA should be aware that ESC and SCC are working together so as to agree the separation of responsibilities – for example, ESC being the Local Planning Authority and SCC being the Local Highway Authority. ESC has noted Deadline 1 as the date for submission of the first draft.

Principal areas of disagreement summary statements (PADSS)

ESC has already submitted a PADSS as requested by PINS, and notes that the submission of updated version is required at Deadline 3, 7 January 2026.

Local Impact Report (LIR)

ESC will be submitting a LIR by Deadline 1, Tuesday 18 November, as required.

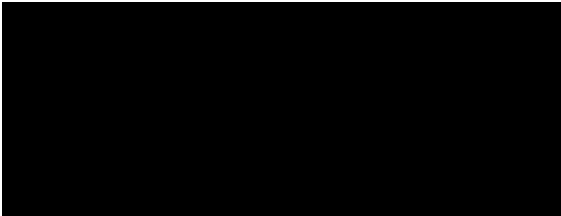
Principal Issues

ESC has noted the ExA's initial assessment of the principal issues and has nothing to add at this juncture, save that in the context of "inter-project cumulative effects", ESC would hope that the ExA will also be prepared to consider not just the cumulative impact of existing projects (including, but not exclusively, NSIPs such as Sizewell C and ScottishPower Renewables' East Anglia ONE North and TWO projects), but also future pending NSIP proposals currently at the pre-application stage, for example Lion Link, the proposed electricity link between the UK and the Netherlands which it is anticipated will come to land within the administrative area of ESC.

Accompanied Site inspection

ESC has reviewed the unaccompanied site inspections undertaken by the ExA - **[EV1-001 to EV1-009]** - and for its part does not consider that any additional accompanied site inspections will be necessary as matters currently stand.

Yours sincerely



Brian Greenwood
Clyde & Co LLP