

# SEA LINK

EN020026

## Post-Hearing Submission for Preliminary Meeting

Suffolk County Council



Deadline 1A

26 November 2025

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## Glossary of Acronyms

<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>CRoWA</i>	<i>The Countryside and Rights of Way Act 2000</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>IAP</i>	<i>Initial Assessment of Principal Issues</i>
<i>NPS</i>	<i>National Policy Statements</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PINS</i>	<i>Planning Inspectorate</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

*“The Council” / “SCC” refers to Suffolk County Council.*

## Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written summary of the representations made by the Council at the Preliminary Meeting held on 5<sup>th</sup> November 2025. Examination Library references are used throughout to assist readers.

## Written Summary of Representations made at Preliminary Meeting

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
1	<b>Introductions</b>	
	<p>Suffolk County Council were represented by the following team in person:</p> <ul style="list-style-type: none"> <li>- N/A</li> </ul> <p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none"> <li>- Michael Bedford - Kings Counsel</li> <li>- Graham Gunby - National Infrastructure Planning Manager</li> <li>- Roland Arbon - Project Manager</li> <li>- Zachary Farndon - Senior Planning Officer NSIPs</li> </ul>	
2	<b>The Examining Authority's remarks about the examination process</b>	
	<p>2.1 SCC raised concern were the only blended events to be at venues in a central location in London such that there will be no blended events held at a venue in either Suffolk or in Kent regardless of the subject matter of that Issue Specific Hearing. In response, the ExA confirmed that the set of hearings scheduled for January will be blended events located in a central location.</p> <p>2.2 SCC accept that logistical challenges can arise from the geography of an examination where the works concerned are quite remote from each other. However, SCC named the previous example</p>	

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	<p>of the Lower Thames Crossing where the ExA have faced similar logistical challenges during examination on a project of at least the same scale. There, the examining authority adopted an approach that where hearings held on Essex related issues were held at a venue in Essex in the vicinity of Thurrock with the option of virtual attendance. Similarly, for those issues that affected Kent, there were issues specific hearings at a venue in Brands Hatch. There were also hearings at a venue at a hotel in London for non-geographically specific sessions such as the wording of the DCO and control documents. That examining authority was able to cope with the logistics of travel between either side of the Thames Estuary and also a venue in London. SCC is concerned about the ability for Interested Parties, including local communities, to participate in the hearings if the only blended events in future were to take place at a London based venue rather than in Suffolk.</p>	
3	<b>Initial assessment of principal issues – annex C to Rule 6 Letter</b>	
	<p>3.1 SCC requested clarification regarding the rationale that has informed the approach to the IAPI to help understand why certain things are in it and certain things are not explicitly mentioned. SCC appreciates that everything has to be examined in the context of the content of the policy guidance in the relevant national policy statements. However, it is not clear to SCC why those matters are singled out even though they are also expressly dealt with within the national policy statements. Whilst the generic topic may well be addressed in the NPS, the specifics relevant in a geographic sense to some impact of this scheme is something which ought to be separately identified.</p> <p>3.2 SCC identified the example of the Benhall Bridge as one of the construction impacts that the ExA are particularly wanting to examine. SCC welcomes that and it has been raised as a key concern</p>	

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	<p>in SCC's relevant representation [RR-5209]. SCC identified that there is a specific geographic area which is proposed for BNG compensation which SCC considered to not be captured in the relevant items of the IAPI relating to biodiversity but thought it merited it.</p> <p>3.3 SCC made another geographically relevant point relating to the national landscape identified in the IAPI under the design, landscape, heritage, and visual effects. SCC sought reassurance that the statutory duty in section 85 (A1) of the Countryside and Rights of Way Act 2000 which falls on the examining authority in terms of reporting to the Secretary of State who is directly subject to the duty. SCC wants to be reassured that the ExA has the duty firmly in mind and will be part of the exploration of that issue. SCC's representations on this matter stem from trying to understand why it is that some things which are apparently generic are in the IAPI and other things are not.</p> <p>3.4 Whilst SCC recognises that the sufficiency and enforceability of mitigation measures is noted as an overarching component of the IAPI, SCC understands that the updated duty in s.85 of CROWA 2000 falls outside of policy requirements for mitigation which would have to be undertaken were the duty not in effect. Therefore, SCC requests assurance that the ExA intend to examine the application in relation to the question of whether there are sufficient measures to allow the SoS to discharge the s.85 duty given the adverse impacts the project will have on the SECHNL as a designated landscape given the lack of explicit mention of the duty under this item of the IAPI.</p>	
4	<b>Draft examination timetable – annex D to Rule 6 Letter</b>	
	<p>4.1 SCC expressed concern regarding the upcoming Norwich to Tilbury grid reinforcement Examination which is expected to commence in Q1, 2026 and therefore will overlap with the Sea Link Examination. SCC, as one of the host authorities in both schemes, requested that there is</p>	

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	liaison between the Sea Link and Norwich to Tilbury case teams, particularly in the scheduling of hearings and also in terms of deadlines. SCC highlighted the importance of coordination between the two case teams to prevent undue workloads on the various parties who will be involved in both Examinations.	
5	<b>Procedural decisions – annex G to Rule 6 Letter</b>	
	SCC did not comment on this agenda item	
6	<b>Any other matters</b>	
	SCC did not comment on this agenda item	
7	<b>Close of preliminary meeting</b>	
	SCC did not comment on this agenda item	