

SEA LINK

EN020026

Post-Hearing Submission for Issue Specific Hearing 1

Suffolk County Council



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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>EA1N</i>	<i>East Anglia One North</i>
<i>EA2</i>	<i>East Anglia Two</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>LHA</i>	<i>Lead Highway Authority</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PEIR</i>	<i>Preliminary Environment Impact Report</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 Issue Specific Hearing 1 (ISH1) held on 11th November 2025. Examination Library references are used throughout to assist readers.

Written Summary of Representations made at Issue Specific Hearing 1 (ISH1)

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
1	Welcome, introductions, arrangements for the Hearing	
1.1	<p>Suffolk County Council were represented by the following team in person:</p> <ul style="list-style-type: none"> - N/A as virtual event <p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none"> - Michael Bedford – Kings Counsel - Graham Gunby – National Infrastructure Planning Manager - Zachary Farndon – Senior Planning Officer (NSIPs) - Roland Arbon – Project Manager (NSIPs) - Steve Merry – NSIPs Highways Manager - Seph Pochin – Ecologist 	
2	Matters arising from the supplementary agenda	
2.1	SCC did not comment on this agenda item.	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
3	Need	
3.1	SCC did not comment on the need case but will consider the written response from the Applicant regarding questions on the need case and respond if necessary.	
4	Update on related projects	
4.1	<p>Current status of any applications to discharge requirements in relation to the SPR National Grid substation</p> <p>Comments made by SCC at ISH1</p> <p>4.1.1 SCC stated that that East Suffolk Council is not the discharging authority in all cases on the SPR East Anglia One North (EA1N) and East Anglia Two (EA2). In some cases, SCC, as Lead Local Flood Authority (LLFA), Lead Highways Authority (LHA) and in matters relating to Archaeology and Emergency Planning are the discharging authority.</p> <p>Update on EA1N and EA2 Discharge of Requirements for the Onshore Substation where SCC is the Discharging Authority (Response to Action Point 6 in the ISH1 Action Points [EV3-007])</p> <p>SCC/0082/25/DoR/EA1N</p> <ul style="list-style-type: none"> • Discharge of Requirement 19(1) Pre-commencement archaeology execution plan and Requirement 20(1) Archaeology (Archaeological Written Scheme of Investigation) for the SI Surveys at the Substations Area for East Anglia ONE North Offshore Windfarm • Status: Application Approved 	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC/0084/24/DoR/EA2</p> <ul style="list-style-type: none"> Discharge of Requirement 19(1) Pre-commencement archaeology execution plan and Requirement 20(1) Archaeology (Archaeological Written Scheme of Investigation) for the SI Surveys at the Substations Area for East Anglia TWO Offshore Windfarm Status: Application Approved <p>SCC/0156/25/DoR/EA1N</p> <ul style="list-style-type: none"> Discharge of Requirement 33 Emergency Planning Arrangements - Onshore Cable Duct Installation Stage and Substations Stage Status: Application Pending a Decision <p>SCC/0157/25/DoR/EA2</p> <ul style="list-style-type: none"> Discharge of Requirement 33 Emergency Planning Arrangements - Onshore Cable Duct Installation Stage and Substations Stage Status: Application Pending a Decision <p>SCC/0167/25/DoR/EA1N</p> <ul style="list-style-type: none"> Discharge of Requirement 22 (2)(b) Flood Management Plan Substations Stage Status: Application Pending a Decision <p>SCC/0169/25/DoR/EA2</p> <ul style="list-style-type: none"> Discharge of Requirement 22 (2)(b) Flood Management Plan Substations Stage 	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<ul style="list-style-type: none"> • Status: Application Pending a Decision <p>SCC/0172/25/DoR/EA1N</p> <ul style="list-style-type: none"> • Discharge of Requirement 28 (1) Construction Traffic Management Plan - Substations Stage • Status: Application Pending a Decision <p>SCC/0173/25/DoR/EA2</p> <ul style="list-style-type: none"> • Discharge of Requirement 28 (1) Construction Traffic Management Plan - Substations Stage • Status: Application Pending a Decision <p>SCC/0174/25/DoR/EA1N</p> <ul style="list-style-type: none"> • Discharge of Requirement 28 (1) (b) Travel Plan - Substations Stage • Status: Application Pending a Decision <p>SCC/0175/25/DoR/EA2</p> <ul style="list-style-type: none"> • Discharge of Requirement 28 (1) (b) Travel Plan - Substations Stage • Status: Application Pending a Decision <p>SCC/0176/25/DoR/EA1N</p> <ul style="list-style-type: none"> • Discharge of Requirement 16(1) Access Management Plan - Substations Stage • Status: Application Pending a Decision 	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC/0177/25/DoR/EA2</p> <ul style="list-style-type: none"> • Discharge of Requirement 16 (1) Access Management Plan - Substations Stage • Status: Application Pending a Decision <p>SCC/0181/25/DoR/EA1N</p> <ul style="list-style-type: none"> • Discharge of Requirement 32 (1) Public Rights of Way Strategy - Substations Stage • Status: Application Pending a Decision <p>SCC/0182/25/DoR/EA2</p> <ul style="list-style-type: none"> • Discharge of Requirement 32 (1) Public Rights of Way Strategy - Substations Stage • Status: Application Pending a Decision <p>4.1.2 In addition to the above details on progress of Discharge of Requirements for the Substation itself, it should also be noted that SCC has discharged the Requirements for the haul road that will be utilised for the construction of the Substation, and the construction of that haul road is underway.</p> <p>4.1.3 Update on EA1N and EA2 Discharge of Requirements for the Onshore Substation where SCC is the Discharging Authority (Response to Action Point 6 in the ISH1 Action Points [EV3-007])</p>	

4.2	<p>The need for Friston scenario 2 to be included in the DCO</p> <p>Comments made by SCC at ISH1</p> <p>4.2.1 SCC accepts that with the Friston substation currently proceeding under its own DCOs, but not yet under construction, there is something of a ‘moving target’ as to whether it also needs to be included in and authorised by the Sea Link DCO. SCC accepts that at the present time there is currently a case for scenario 2 to be part of the Examination, however, SCC also understands from what has been said today by the Applicant and by SPR that this position may very well change as the Examination progresses.</p> <p>4.2.2 SCC requested that the Applicant provide clarity, potentially in their Post Hearing Submission, regarding at what point it would be in a position to exclude scenario 2 and therefore it will no longer require to be examined. With the requirements for the Onshore Substation stage of the EA1N/EA2 projects currently undergoing the process of being discharged, SCC considers that there is potential for the rationale behind the inclusion of scenario 2 to change during the Examination.</p> <p>4.2.3 SCC stated that if scenario 2 remains part of the Sea Link Examination, then there is a need to ensure a consistency of control documents and requirements and assurance that the Applicant should not be able to use scenario 2 to resile from what it already knows can work and would be delivered under scenario 1. As stated in SCC’s Relevant Representation [RR-5203] and Local Impact Report, the mitigation measures, were the substation to be implemented under the Applicant’s DCO, are inadequate and differ significantly from those secured in the EA1N/EA2 DCO such as the inadequate approach to flood risk and greater extent of working hours.</p>	
4.3	<p>The National Grid Ventures (NGV) LionLink project, consultation, and publication of the Preliminary Environment Impact Report (PEIR)</p> <p>SCC did not comment on this point.</p>	

5	Cumulative impacts	
5.1	The approach to assessment and mitigation of intra-project cumulative effects SCC did not make oral representations on this item.	
5.2	Shipping and navigation in the Sunk and implications of cable burial depth for under-keel clearance SCC did not comment on this agenda item.	
5.3	Cumulative traffic impacts, including construction traffic in combination with other projects and how this has been assessed by the applicant Comments Made by SCC at ISH1 5.3.1 SCC raised outstanding concerns regarding the adequacy of the Applicant's approach to the cumulative effects assessment of Traffic and Transport impacts for the Suffolk Onshore Scheme and indicated that further details would be provided in its LIR. Post-Hearing note: SCC has provided more detail on these concerns in Chapter 11 of its LIR. 5.3.2 In SCC's Relevant Representation [RR-5209] the authority noted the insufficient assessment of the cumulative traffic impacts, specifically at paragraphs 71 to 73. These concerns reflect comments made by SCC in response to the project's Preliminary Environmental Information Report ("PEIR") as part of the project's statutory consultation, specifically paragraph 8.3 of SCC's response the PEIR. 5.3.3 SCC noted that if new information is submitted by the Applicant, regarding the cumulative traffic assessment, at Deadline 1 then obviously this will not have been captured in the LIR, therefore there will likely be some backwards and forwards of successive comments on this matter.	

	<p>5.3.4 SCC's NSIP Highways Manager set out some expectations regarding the Applicant's cumulative traffic impact assessment. This included a sensitivity test on the A12 between Seven Hills and the main part of the Sea Link site and a realistic worse case 'Rochdale Envelope' scenario for cumulative effects.</p> <p>5.3.5 SCC asked the panel to consider information from the EA1N/EA2 Examination, and challenged comments made regarding there not being overlapping peaks of HGV movements from the construction of EA1N, EA2 and Sea Link. EA1N and EA2 have a peak at the beginning when the haul road is built and the peak at the end of it when the haul road is removed. So clearly with the time scale of that project, there is a possibility that the removal of the Scottish Power Haul road will overlap with, or occur close to, one of the peaks for Sea Link.</p> <p>5.3.6 SCC also raised a concern in relation to the lack of assessment of structures between port of origin and destination outside the study area for the purposes of movements of Abnormal Indivisible Loads ("AILs"). To date, the applicant has not assessed any structures on the A12 north or south of the study area.</p> <p>5.3.7 SCC challenges some of the sensitivities such as in terms of delay. For example, in terms of driver delay, to have any magnitude of impact, the IEMA methodology used entails that at least two or more arms of a junction needs to be impacted before any impact is considered to occur. Typically, on the A12, which is the major conduit, there is a straight through A12 and 1 or 2 minor junctions. In that case, the delays for that minor arm are completely disregarded. The concern is partly in terms of delay but also road safety as it increases the risk of drivers jumping in the gaps through frustration.</p>	
6	Trenchless landfalls	
6.1	SCC did not comment on this agenda item.	

7	Reporting of significance	
7.1	Overlap of construction and operational effects in the reporting of biodiversity and ecology effects in the assessment summary tables and the potential for double counting of effects SCC did not comment on this agenda item	
8	Work numbers and works plans	
8.1	Detail provided in the description of work numbers and the visual representation of such works within the relevant works plans. SCC did not comment on this agenda item	
9	Any other business	
10	Close of hearing	