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BY EMAIL

For the attention of the Case Team

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Dear Case Team,

SEA LINK DCO APPLICATION (EN020026)

**SCC PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT
(PADSS)**

Suffolk County council have produced a revised and updated principal areas of disagreement summary statement.

The intention of this revision is to ensure that the current principal areas of disagreement clearly articulated to the examination, and that those areas of disagreement reference the relevant arguments and supporting material provided to the examination by the Council.

Suffolk County Council considers this is particularly important in light of the submissions made by the Applicant such as its responses to the Council's Local Impact Report and the current length and complexity of the Council's Statement of Common Ground with the Applicant.

Principal Areas of Disagreement Summary Statement (PADSS)

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
1.	Access Routes for Construction			
1.1	Selection of access route and assessment of alternatives	<p>Significant concerns have been raised to the Applicant regarding the justification of the choice of the western access route to the converter station site near Saxmundham via the B1121 and the inclusion of a crossing over the River Fromus. The Council believes other access routes which could have potentially avoided impacts caused by this access route have not been reviewed adequately.</p> <p>See Chapter 11 of [REP1-130] for further details.</p>	<p>A justification document for the selected route was produced by the Applicant at the Council's request; however, the Council believes the document did not adequately explain the justification for discounting other potential options, including the use of the consented Sizewell Link Road.</p>	Low
1.2	Use of Benhall Railway Bridge, B1121	Significant concerns relating to the proposed use of the Benhall Railway Bridge, B1121, a Council asset which, due to its structural condition, has a weight restriction of 46 tonnes (STGO 1). The Applicant has	As per the current access route, the railway bridge would form critical infrastructure to deliver the Sea Link scheme, therefore joint engagement with all relevant stakeholders is required, including Suffolk County	Not known at this stage.

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		<p>proposed overbridging for Abnormal Indivisible Loads (AIL) movements, however due to the geometry of the bridge and its proximity to the A12, the Council has concerns over the feasibility of this solution. Concerns include impacts of disruption whilst works are ongoing, including greater levels of traffic due to diversion through Saxmundham and A12/B1119 Rendham junction, lack of evidence on total number of movements that exceed the current weight limit, coordination of bridge closures with traffic related to other NSIPs in the area including Sizewell C and Scottish Power Renewables projects (SPR), lack of detail on temporary traffic management to mitigate impacts of work relating to the bridge.</p> <p>See A1.1 & A5.1 of [REP2-062] and Chapter 11 of [REP1-130] such as paras 11.222 to 11.229 for further details.</p>	<p>Council (as asset owner) and Network Rail (due to the interaction with the East Suffolk Line).</p> <p>Suffolk County Council and East Suffolk Council requested an in-person meeting to attempt to resolve outstanding highways matters, which was held in early August 2025.</p> <p>The Applicant did share further information on their approach to the overbridge but the Council as Local Highways Authority would still need to review the options put forward.</p> <p>The Council considers that there has been a lack of exploration of alternatives such as provision in the Order Limits for installation of a new nearby bridge. A lack of detail has been provided at this stage to demonstrate the feasibility of the mini-bridge and bridge repair options including information on what adverse effects will be experienced by residents of the nearby Whitearch caravan park and how their access,</p>	

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			including both 'routine' day to day trips and also less frequent but important trips such as emergency access and/or removals, will be not be compromised.	
1.3	Proposed River Fromus Crossing	<p>The Council considers the construction of a 5-metre-high bridge across the River Fromus a disproportionate solution in creating a permanent access to the converter station were permanent access demonstrated to be necessary. There has been a lack of exploration and detail regarding the feasibility of a temporary solution.</p> <p>The proximity and proposed scale of the bridge will result in permanent loss of woodland and create significant adverse effects on the landscape character and setting of the Grade II Listed Hurts Hall and Grade II* Listed St John the Baptist Church in Saxmundham.</p> <p>The setting of the crossing has been identified as sensitive by the Suffolk</p>	<p>If the proposed access route for the converter station site is used, the installation of a temporary bridge should be explored in the first instance to seek to minimise adverse impacts.</p> <p>The Council considers a permanent bridge to be an unnecessary and disproportionate solution. See paragraphs 5.72 to 5.77 of [REP1-130] and the Council's response to Deadline 2 submissions for further detail.</p> <p>If a permanent bridge is used for the proposed access route, the design of the access road and bridge would need to be of outstanding quality and harmonise with its setting. Provision must also be made for benefit for the host community such as through the</p>	<p>Not known at this stage.</p> <p>Little detail has been provided by the applicant regarding bridge design at this stage, with the indication being that design matters will be managed Post Consent.</p>

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		<p>Coastal Sensitivity Assessment (2018), and the area is identified as an important landscape as a rural approach to Saxmundham, reinforcing its setting within the Fromus valley. The removal of vegetation to facilitate the construction of the bridge will also open up views towards the converter station site.</p> <p>See A1.2 [REP2-062] and Chapter 11 [REP1-130] for further details.</p>	<p>bridge being used as a public right of way.</p> <p>As currently proposed the Fromus Crossing is unacceptable.</p> <p>Although the design of the bridge is predominantly a district function, the Council supports the district's requirement that there be an appropriate consenting mechanism to ensure the design of the bridge is appropriate for its setting.</p>	
2.	Converter Station Site			
2.1	Design - Building and landscaping masterplan	<p>Concerns exist regarding the Applicant's approach to design regarding the Converter Station and associated landscaping of the site. A clear vision for the whole of the project is essential, but currently the lack of detail provided during pre-application is a cause of concern. Considering the scale of the development in a rural setting, good design for the converter station site is</p>	<p>The Applicant has engaged with the Suffolk Design Review Panel (DRP) regarding the Masterplanning of the site; however, it is felt there was a missed opportunity for the Applicant to publish the DRP feedback to demonstrate transparency and contribute to building public confidence in the project.</p>	<p>Not known at this stage as work on the design of the converter station and masterplanning of the site would continue post decision if consent were granted.</p>

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		<p>essential to mitigate the visual impacts of this and future schemes which may be accommodated on the converter station site. The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils.</p>	<p>The Council recommends that a DRP process is undertaken post-consent to finalise the design,</p> <p>There must be provision for an adequate consenting mechanism for the approval for the final design.</p>	
2.2	Surface water drainage and flood risk	<p>Surface water drainage and flood risk at the converter station site needs to be comprehensively assessed and managed due to the topography and potentially poor infiltration properties of the Ancient Estate Claylands. Sufficient land should be included within the Order Limits to accommodate drainage for the site during construction and operation.</p> <p>See Chapter 8 [REP1-130] for further details.</p>	<p>Ongoing discussions required with the Council as the Local Lead Flood Authority (LLFA).</p> <p>There should be a requirement for a Surface Water Drainage Management Plan to be approved by the LLFA which accords with national and local policy and guidance.</p>	Not known at this stage.

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3.	DCO Order Limits			
3.1	Insufficient land for mitigation within Order Limits	<p>Concerns over reductions applied to the Order Limits over the pre-application stage has limited the Applicant's ability to provide effective mitigation for areas including landscaping, visual amenity, enhancement and diversions of public rights of way. Examples include the Converter station site and alongside the B1119 to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users (NMUs).</p> <p>See A1.3 of [REP2-062] for further details.</p>	<p>The Council has cited concerns to the Applicant and cited that the area along with the River Fromus and the field north of the converter station site should form part of the Order Limits. In addition, the Council is concerned that, whilst the Order Limits are proposed to be extended to incorporate the Benhall Bridge, the extent of land included does not provide sufficient flexibility to embrace all potential solutions, including the option of installing a replacement bridge, parallel to the existing bridge, so minimising the disruption to traffic movements during its provision.</p> <p>Whilst the Council welcomes the increase in the Order Limits along the B1119 for mitigation, concerns remain over the lack of provision in the Order Limits for new public rights of way in this area and whether the increase in</p>	Not known at this stage.

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
			the order limits is enough for the proposed mitigation works. The rest of the Council's concerns are not addressed or affected by the change request.	
3.2	Friston substation site – Differences between Sea Link and SPR proposals	The Applicant Order Limits regarding the Friston Substation site do not match those consented by SPR. Areas of land set aside for landscape mitigation and diversion of public rights of way have not been included.	The Applicant needs to provide evidence that the Order Limits proposed around Friston substation is appropriate to accommodate mitigation for Sea Link, considering the mitigations already secured by the SPR consents.	Not known at this stage.
4.	Development Consent Order			
4.1	Core Working Hours – Inclusion of Sundays and Public Holidays 7am-5pm	The Council regards the inclusion of core working hours which spans seven days a week and Public Holidays as unacceptable due to the lack of respite for local residents from the impacts associated with construction activities including disruption to local roads and public rights of way (PRoW) used for recreational activities at a time when they are most frequently used.	The Council requires the Applicant to align their working hours with SPR's consented schemes, which removes Saturday afternoons, Sundays and Public Holidays from the core working hours.	Unknown – The Applicant has explained the inclusion of Sundays and Public Holidays is for flexibility, so currently no movement towards an agreement to reduce or remove these additional hours.

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		<p>Regarding the potential delivery of the substation in Friston under the Sea Link DCO, the Applicant has not committed to undertake construction under the working hours agreed under the SPR consent which does not include Public Holiday and Sunday working.</p> <p>See Chapters 13-15 [REP1-130] and A1.4 of [REP2-062] for further details.</p>		
4.2	Draft Management Plans	<p>The Council is concerned regarding the level of detail submitted within the outline management plans and the insufficiency of controls to adequately minimise environmental, social and economic adverse impacts.</p> <p>Outstanding concerns over the adequacy of outline management plans and mitigation commitments can be found in SCC's previous submissions paragraphs 15.42-15.45 [REP1-130] and [REP2-062].</p>	<p>The Council expects a two-stage approach where Management Plans are submitted in accordance with Outline Management Plans for each phase of the development.</p> <p>The Council also requires further information on the embedding of controls within management documents and the subsequent monitoring, compliance and enforcement of these measures.</p> <p>The details and control commitments the Council expects within the application's control documents are</p>	Not known at this stage.

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			detailed in the Council's previous submissions [REP1-130] and [REP2-062].	
4.4	Which consent will be used to construct substation at Friston (SPR or Sea Link)	The Applicant has yet to specify whether they would use their own DCO (if consented) or the SPR consent to build the substation at Friston. It is noted that there are discrepancies between the respective DCOs including the order limits and mitigation.	The Applicant needs to make clear whether they plan to align with the SPR consent for the delivery of the substation in Friston or whether they plan to use the current terms of their own DCO (if consented). The Applicant should seek to use the SPR consent and remove Scenario 2 from the DCO once it is clear that the substation will be built using the SPR consent.	Not known at this stage.
4.5	Inadequate DCO	The Council is concerned by the lack of robustness within the DCO in various ways. This includes unclear and inadequate wording, protective provisions for highways, inadequate process for discharging requirements and insufficient provision to ensure adverse effects are minimised and effects do not exceed those assessed.	The Applicant should consider the drafting changes proposed by SCC and seek to engage with the Council to reach agreement as far as possible.	Not known at this stage.

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		See SCC's submissions, including Chapter 15 of [REP1-130] and table B11 of [REP2-062] for the full detail of this issue.		
5.	Substation site in Friston			
5.1	Surface water flood risk	<p>Friston is a particularly sensitive area in terms of surface water flood risk to downstream receptors and has been subject to flooding on multiple occasions.</p> <p>It is essential that appropriate land is included on site to accommodate an effective drainage solution.</p> <p>See A4.1 of [REP2-062] and Chapter 8 [REP1-130] for further details.</p>	<p>The Applicant's assessment should include various s19 investigations by the LLFA under the Flood and Water Management Act 2010 and a discussion of the findings of the 2020 study undertaken by the BMT as referenced in Chapter 8 of REP1-130].</p> <p>The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.</p> <p>The Applicant should also consider drainage design in association with the drainage proposals consented under East Anglia One North and Two schemes.</p>	Not known at this stage.
5.2	Design	Concerns exist regarding the Applicant's approach to design	The Applicant should be undertaking a participatory approach to design with	Not known at this stage.

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		regarding the Kiln Lane substation and associated landscaping of the site. Considering the scale of the development in a rural setting, good design for the converter station site is essential to mitigate the visual impacts of this and future schemes which may be accommodated on the site.	the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils. There should be a requirement for the design to be approved.	
6.	Public Rights of Way (PRoW)			
6.1	Public Rights of Way – mitigation measures	<p>An array of adverse effects, including significant effects, have been identified for PRoW as a result of the Suffolk Onshore Scheme. There is inadequate provision within the application to avoid adverse impacts and explore the creation of new links during diversions.</p> <p>See paragraphs 11.231-11.241 [REP1-130] and Table A6 of [REP2-062] for further details.</p>	<p>PRoW enhancement and creation should be explored and implemented. Potential measures for improving PRoW include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PRoW) alongside the Fromus crossing to link to the existing PRoW network.</p> <p>There should be a commitment to keep Public Rights of Way open and available during the construction period as far as possible. This could</p>	Not known at this stage.

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
			be achieved through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRoW network, especially during the construction period.	
7.	Coordination with Other NSIP Projects			
7.1	Lack of coordination and acknowledgement of cumulative effects of Sea Link alongside other NSIP projects	<p>The Council is deeply concerned regarding the apparent lack of meaningful discussion between Sea Link and other NSIP projects in the same locality, to find opportunities to coordinate activities to reduce the impact of construction (e.g. on the highway network) of multiple projects on host communities on the East Suffolk Coast.</p> <p>As a result, differing landfall and cable routes have been selected by separate projects which will increase the impacts of construction on the</p>	<p>The Council cannot stress enough the importance of NSIP promoters not considering the impacts of their schemes in isolation. The mental health and wellbeing impacts are cumulatively increasing with each new project.</p> <p>Promoters must consider the impacts of their scheme in association with the timelines of the construction of other NSIP projects in geographic proximity and have meaningful discussions to develop strategies to minimise the impacts of multiple, successive NSIP</p>	Not known at this stage.

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
		host communities, landscape, and ecology.	<p>schemes on host communities and the environment.</p> <p>Evidence should be produced demonstrating that the Applicant has done as much as could reasonably expected to coordinate and collaborate with developers of NSIPs in the vicinity, including by seeking to enter into formal collaboration agreements such as data sharing to facilitate future coordination and minimisation of adverse impacts.</p>	
7.2	Coordination with the National Grid Ventures (NGV) LionLink Scheme	<p>Although the Converter Station site provides a colocation for both Sea Link and LionLink schemes, the Council feels that the Applicant could reduce the environmental and construction impacts of the scheme by laying additional ducts alongside those required for the Sea Link project (for example for High Voltage Alternating Current (HVAC) cabling between the converter station and the substation at Friston).</p>	<p>The Council suggest that the Applicant includes the flexibility within the DCO to accommodate laying additional cable ducts for LionLink to reduce the impacts and disruption which would occur due to successive NSIP projects requiring to undertake cable installation in close proximity in both time and location</p> <p>The Council urges the Applicant to work with NGV to agree coordination of construction compounds to prevent</p>	Not known at this stage.

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		The Applicant should seek to coordinate the Sea Link construction compounds with LionLink (where works overlap) during construction of the converter station.	unnecessary impacts of separate construction compounds.	
7.3	Substation at Friston – Interaction of cable route with consented East Anglia One North and Two Planting	As currently designed, there is a considerable risk that the HVAC cable corridor route proposed to the substation at Friston could impact the landscape planting consented under East Anglia One North and Two.	The Applicant needs to work with SPR to consider options to minimise the potential impacts of the proposed cable route into the Friston substation on the consented landscape planting for East Anglia One North and Two.	Not known at this stage
8.	Cumulative Impacts			
8.1	Environmental and Socio-economic impacts of cumulative developments in East Suffolk.	The Council has significant concerns regarding the cumulative environmental and socio-economic impact of Sea Link alongside the construction of other NSIP projects in the area, including Lion Link, Sizewell C and those consented which will be delivered by SPR. Particular concerns exist around cumulative effects on traffic and transport, landscape, tourism,	There is a need for a full worst-case scenario assessment of environmental and socio-economic cumulative effects of the project in conjunction with others taking place in East Suffolk. The comments made by the Council in its previous submissions should be addressed within the assessment. Notable concerns expressed by the Council include the use of	Not known at this stage.

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		<p>workforce, PRoWs and health and wellbeing including mental health.</p> <p>Detail on SCC's concerns can be found in its examination representations including [RR-5209], [REP1-130] and [REP2-062].</p>	<p>considerations around the likelihood of the assessed worst-case scenario being used to downgrade magnitude of effects, the robustness of the cumulative transport assessment and an apparent general underestimation of the magnitude of cumulative effects.</p> <p>The Applicant should commit to appropriate and sufficient mitigation measures both alone and in conjunction with cumulative projects to adequately avoid and minimise adverse effects.</p>	
9.	Schedulable Archaeological Site Discovery			
9.1	Approach to mitigation around significant monument in the Parish of Friston	<p>At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ, following the completion of additional geophysical survey work, the</p>	<p>If the Applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, the Suffolk County Council Archaeological Service (SCCAS) do not object to the expansion of the Order Limits in line with the areas proposed in the change request.</p> <p>SCCAS are pleased that geophysical survey and trial trenched evaluation</p>	Somewhat likely

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		<p>interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable</p>	<p>has now been completed for these new areas (the additional geophysical survey report has now been submitted and SCCAS are happy to approve this document, and although the additional trial trenched evaluation report is pending, SCCAS have monitored the results of this work in person in the field).</p> <p>Although some additional archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be required in this section of the cable corridor, there is a suitable alternative route which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance.</p>	

Yours faithfully,

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Senior Planning Officer

Growth, Highways & Infrastructure
Suffolk County Council