

SEA LINK

EN020026

Post-Hearing Submission for Open Floor Hearing 3

Suffolk County Council

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Glossary of Acronyms

<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ExQ1</i>	<i>Examining Authority’s First Written Questions</i>
<i>ESC</i>	<i>East Suffolk Council</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>ISH2</i>	<i>Issues Specific Hearing 2</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>NGET</i>	<i>National Grid Electricity Transmission</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OLEMP</i>	<i>Outline Landscape and Ecology Management Plan</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PEIR</i>	<i>Preliminary Environment Impact Report</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>RSPB</i>	<i>Royal Society for the Protection of Birds</i>
<i>SBIS</i>	<i>Suffolk Biodiversity Information Service</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SECHAONB</i>	<i>Suffolk and Essex Coast and Heaths Area of Outstanding Natural Beauty</i>
<i>SPA</i>	<i>Special Protection Area</i>
<i>SPR</i>	<i>Scottish Power Renewables</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 Open Floor Hearing (OFH3) held 24 March 2026. Examination Library references are used throughout to assist readers. Tables are numbered in line with the OFH3 agenda, items which were not relevant to Suffolk County Council have not been included in this submission.

Written Summary of Representations made at Open Floor Hearing 3

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> <p>Councillor Richard Rout - Cabinet Member for Devolution, Local Government Reform and NSIPs</p> <p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none">• [REDACTED] – National Infrastructure Planning Manager	

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4	Representations by interested parties and others	
	<p>My name is Councillor Richard Rout and I am Cabinet Member for Devolution, Local Government Reform and Nationally Significant Infrastructure Projects at Suffolk County Council.</p> <p>I'd like to thank you for providing this opportunity for me to address you in person about the SEA link proposed change requests for the project.</p> <p>The applicant has proposed modifications in relation to the red line at the Benhall Road over rail bridge. As requested by the Examining Authority, the County Council has provided further details regarding its alternative approach to the project's access route found in REP4 -149 and REP-5-179. These submissions set out the Council's rationale for this proposal and its benefits relative to the considerable adverse impacts and risks associated with the applicant's proposal for access to the site.</p> <p>The only real change to the application caused by the inclusion of the Benhall Bridge in the red line boundary is that the process of acquiring the necessary consents to use the bridge becomes simpler for the applicant. Indeed, the proposed modifications put forward do little more than serve to underline the inherent weaknesses and flaws of the proposed development. The impacts of the scheme on heritage and landscape remain and as the examination has progressed, the impacts of the access proposals on the local community have become even more apparent[ZF1.1].</p> <p>The Council is particularly concerned regarding the well-being and safety of the residents White Arch Park in Benhall. The Council is pleased that the Applicant has now recognised the importance of access for the White Arch residents, as shown by commitments to taxis for residents who do not have access to a vehicle in the latest version of the Register of Environmental Actions and Commitments REP5-116.</p>	

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	<p>However, the Council is concerned with the lack of detail regarding how these commitments will work in practice. Detail has not been provided demonstrating that access for White Arch residents can be maintained whilst a mini-bridge is installed over the Benhall Bridge. The Council considers greater detail regarding the logistics of the taxi service should be provided in a control document, to be agreed post-consent, with the Council.</p> <p>It is noted that the applicant has provided a response to the preliminary alternative access proposal set out by the Council REP5-125. Suffolk County Council will respond to this at the next deadline.</p> <p>However, in the interim, I will just say, the County Council recognises that its alternative access proposal is not without issues, but considers that on balance, the harms of this alternative access scheme and the risks associated with its delivery, outweigh those issues, and that the scheme offers in the long-term strategic benefits. Therefore, notwithstanding the longer journey time, the alternative scheme of access is substantially more robust than that being proposed by the applicant.</p> <p>In the Council's consultation response and relevant representation on the Change Request [REP3A-031], strongly recommended that further expansion of the Order Limits is needed at the Converter Station site to increase the provision of mitigation planting and allow for a Public Right of Way. However, this has not happened.</p> <p>Rather, the small changes only serve to demonstrate the contrast with the Lion Link project, which set out a comprehensive preliminary approach to the design of the site in their recent consultation, an approach that had been developed in response to detailed feedback from the community.</p>	

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	<p>Finally, turning to the modifications to the scheme at the Friston Substation site, whilst these are welcome improvement in terms of alignment between projects, the Council has submitted to the examination in REP5-181 a table setting out how the DCO wording needs further amendment to ensure that the benefits safeguards secured by the existing Scottish Power Renewables consent are fully transposed into the SEA Link DCO.</p> <p>The Council has worked with Friston Parish Council on this problem, and I would like to take this opportunity to take this opportunity to thank the Parish Council and Mr Michael Mahoney in particular for working constructively with the Council on this issue.</p>	

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