

Summary of Outstanding Issues- Deadline 7 Submission

Introduction

As we approach the final weeks of this Examination, I would like to begin by thanking the Examining Authority for the depth and persistence of your questioning to date. Your detailed enquiries have been essential in illuminating gaps in the Applicant's evidence and in testing the robustness of the case for this nationally significant project.

I have participated in this Examination as an **Interested Party** (██████████), having submitted a Relevant Representation, multiple written submissions, and having spoken at both Open Floor Hearings and Issue Specific Hearings (RR-4116, REP1A-159, REP2-097, REP3A-154, REP4-177, REP4A-032 & REP6-225). Throughout this process, I have consistently sought to assist the ExA by providing local evidence, highlighting procedural gaps, and raising concerns about the adequacy and accuracy of the Applicant's case.

Regrettably, despite the ExA's sustained efforts, the Applicant has still not provided full, clear, or satisfactory answers on several fundamental matters. A pattern has emerged in which the Applicant repeatedly downplays, minimises, or defers the very real and significant impacts that the Sea Link project would impose on the communities, landscapes, heritage assets, and transport networks of this part of Suffolk.

As a resident of Saxmundham directly affected by the proposals, I remain deeply concerned that the Applicant has not meaningfully engaged with alternatives, has not provided adequate design information, and has not demonstrated that the project is justified in its current form. My outstanding concerns are set out below.

1. Benhall Railway Bridge Works – Unresolved Impacts on My Area

The Applicant has still not provided a clear, comprehensive, or technically credible explanation of what works are actually required at Benhall Railway Bridge or what the cumulative impacts would be on residents, businesses, emergency access, and the functioning of Saxmundham and surrounding areas.

The bridge is a critical local artery. Any prolonged closure or heavy-vehicle works would have severe consequences for daily life, local services, and the resilience of the road network. The Applicant's repeated attempts to minimise these impacts, while failing to provide detailed construction methodologies, traffic modelling, or mitigation are unacceptable at this stage of the Examination.

2. Failure to Fully Explore the Northern Access Route (Suffolk County Council Proposal)

It remains unclear why the Applicant has not properly assessed Suffolk County Council's proposed **Northern Route**, which would share the Sizewell Link Road (SLR) corridor and avoid the need to cross Benhall Railway Bridge entirely.

The Northern Route avoids the severe impacts associated with the Applicant's preferred B1121 route and new Fromus bridge, aligns with the Mitigation Hierarchy by avoiding harm rather than attempting to mitigate it after the fact, and represents the kind of developer cooperation encouraged by EN-1 and EN-5. It is also likely to be significantly cheaper, avoiding the construction of a new bridge and major interventions at Benhall.

There is now a general consensus among local authorities, community groups, and affected residents that the Northern Route is the only credible, proportionate, and environmentally responsible access solution. The Applicant's refusal to meaningfully engage with it is a major failing.

3. Lack of Adequate Design Visuals for the Proposed Fromus Bridge

The Applicant has still not provided accurate visualisations, realistic photomontages, or final design details for the proposed new bridge over the River Fromus.

Given its immediate proximity to Hurts Hall, its setting within a sensitive landscape, and the potential for irreversible harm to heritage significance, this absence of information is extraordinary. Without proper visuals, neither the ExA nor the public can understand the scale, massing, or visual intrusion of the structure.

This is a fundamental evidential gap.

4. No Final Designs for the Converter Station Buildings

Despite repeated requests throughout the Examination, the Applicant has still not produced final or even sufficiently detailed indicative designs for the converter station buildings. This is particularly troubling given the sensitive landscape setting, the proximity to Saxmundham Historic Market Town, and the closeness of the site to existing residential areas. The scale and industrial character of the proposed structures mean that design clarity is essential, yet we still do not have a realistic understanding of what is being proposed.

Without credible design information, it is impossible to judge the true extent of visual harm or to understand whether the mitigation the Applicant refers to would be effective

in practice. At this stage, we cannot even be confident that the site is appropriate for development of this magnitude. The Applicant's continued lack of clarity undermines the Examination's ability to assess the project's impacts in any meaningful way.

5. The Need Case Should Have Been Re-examined After Nautilus Was Removed

The removal of Nautilus from the Saxmundham site fundamentally changes the strategic context in which Sea Link was originally conceived. Despite this, the Applicant has not revisited the need case, updated its modelling, or provided any fresh assessment of alternative siting options. The RAF Leiston site, in particular, should have been properly investigated once the original clustering rationale fell away.

The justification for concentrating multiple converter stations at Saxmundham has effectively collapsed, yet the Applicant has continued on its original course as though nothing has changed. This failure to pause, reassess, and update the need case represents a serious procedural and strategic flaw, and it raises legitimate questions about whether the project, in its current form, remains justified at all.

6. Last-Minute Attempt by National Grid to Rewrite the Rules of the Sea Link Examination (AS-167)

I am extremely concerned by the Applicant's late submission **AS-167**, which seeks to rewrite the governance of the Sea Link DCO at Deadline 7. While the Government has indicated that a DESNZ Requirement Discharge Unit is likely to be established soon, the Applicant's own document confirms that this body does not yet exist, has no published remit, and has no defined procedures for electricity networks projects. Despite this, NGET proposes to embed it into the Sea Link DCO now.

What is most troubling is that the Applicant proposes that NGET itself would decide "*in each case*" whether the DESNZ unit or the local authority acts as the discharging authority. This would allow the developer to choose its own regulator, bypass local authorities at will, and reduce Suffolk County Council and East Suffolk Council to mere consultees. Such an arrangement is unprecedented and incompatible with transparent, accountable post-consent governance.

This proposal also directly contradicts the position of Suffolk County Council, which has been publicly and consistently opposed to the DESNZ unit since it was first suggested. SCC has warned that removing requirement-discharge powers from local authorities would slow down processes, add bureaucracy, and put communities at risk of being ill-considered. As Councillor Richard Rout stated:

“Local communities rely on their local authorities to hold National Grid, and other energy developers, to account... I fail to see how this recommendation will speed up process.”

SCC has also warned that projects such as Sea Link and LionLink are precisely the schemes that could cause more harm if decisions are taken away from experienced local authorities and handed to a centralised DESNZ unit.

Introducing this governance change at Deadline 7 disregards the entire six-month Examination process. Local authorities and the ExA have worked constructively to shape and refine the draft DCO into something more workable and locally accountable. The Applicant’s proposal would overturn that work in a single step, replacing a clear, collaboratively developed structure with a conditional, developer-selected mechanism based on a unit that is not yet operational.

Even if the DESNZ unit is established soon, there is no policy basis for allowing developers to opt out of local authority oversight or to rewrite DCO governance at the eleventh hour. The proposal introduces legal uncertainty, weakens local accountability, and sets a dangerous precedent for LionLink and future NSIPs.

For these reasons, I strongly urge the Examining Authority to recommend that AS-167 is removed from the Examination in full.

Conclusion

Given the unresolved issues above, and the Applicant’s continued reluctance to provide full, transparent, and technically robust information. I remain unable to support the Sea Link project. The Examination has revealed significant deficiencies in the Applicant’s approach to alternatives, design, mitigation, justification, and now, through AS-167, even the governance of post-consent decision-making.

The Applicant should have paused, reconsidered, and changed course. Instead, it has pressed ahead without addressing the fundamental concerns raised by local authorities, statutory consultees, and affected communities.

I respectfully ask the Examining Authority to give full weight to these outstanding issues when reaching your recommendations.

Government decision on energy projects could threaten Suffolk communities

Local communities could suffer at the hands of large energy infrastructure projects, as the UK government looks to push schemes through more quickly and take away powers from local authorities.

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Suffolk County Council is opposing the Sea Link project.

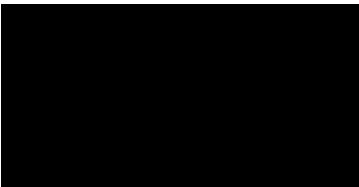
Government is planning to overhaul the nuclear system to speed up building, strengthen national and energy security, cut costs, and not get “bogged down in processes”, as described by the Prime Minister.

In response to a report by the Nuclear Regulatory Taskforce, government has accepted a recommendation to establish an in-house unit at the Department for Energy Security and Net Zero (DESNZ), to discharge Development Consent Order (DCO) requirements.

This is currently the responsibility of local authorities, who are best-placed to consider the impacts on local communities and local environment.

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At a time when government is looking to increase the speed of delivery and reduce complexity of these projects, I fail to see how this recommendation will speed up process.



Councillor Richard Rout, Suffolk County Council’s Cabinet Member for Devolution, Local Government Reorganisation and NSIPs

Taking this further, government is also minded to extend that approach beyond nuclear projects and electricity network projects, to all energy projects.

Suffolk County Council is concerned that this will in fact add layers of bureaucracy, slow down the process and put communities at risk of being ill-considered as projects are built.

Councillor Richard Rout, Suffolk County Council's Cabinet Member for Devolution, Local Government Reorganisation and NSIPs, said:

“Local communities rely on their local authorities to hold National Grid, and other energy developers, to account – something which Suffolk County Council has, and continues to do effectively. We can ensure that they are robustly protected when this critical national priority infrastructure is being built.”

“Does DESNZ have the capacity and skills to deliver this work for multiple projects across the country? Or will it, as seems more likely, place additional burdens on local authorities to support this new layer of bureaucracy, with the cost falling on local taxpayers?”

“At a time when government is looking to increase the speed of delivery and reduce complexity of these projects, I fail to see how this recommendation will speed up process.”

This means that projects directly affecting Suffolk like Norwich to Tilbury pylons, Sea Link and LionLink risk causing more harm to local communities and environment, when decisions and powers to discharge will fall to DESNZ, rather than experienced local authorities.