



The Planning Act 2008

Application by National Grid Electricity Transmission for the Sea Link Project

East Suffolk Council's comments on responses to the Secretary of State's Request for Information issued 28 August 2026

Issued: 22 September 2026

Deadline: 22 October 2026

Application: EN020026

East Suffolk Council: [REDACTED]

1. Introduction

- 1.1 East Suffolk Council (ESC) has reviewed the responses provided by the Applicant and Interested Parties to the Secretary of State's Request for Information issued 28 August 2026. ESC's comments on these responses are provided in the subsequent sections of this document.

2. ESC's comments on the Applicant's responses in relation to ESC's Deadline 7 submission on Community Mitigation Payments

- 2.1 ESC has reviewed the Applicant's responses to Items 8, 41 and 56 of the Secretary of State's Request for Information in relation to ESC's request for Community Mitigation Payments.
- 2.2 ESC welcomes the Applicant's commitment to establishing a Community Fund and recognises the work undertaken to engage with local authorities, community organisations and residents in the development of the proposed Fund.
- 2.3 However, the Community Fund represents a community benefit initiative rather than a mechanism for mitigating the direct impacts of the Proposed Project. As acknowledged by the Applicant, community benefits are separate from the development consent process and are not intended to mitigate environmental, social, or economic effects arising from the development.
- 2.4 It is in the context of mitigating the residual impacts of the project that this request for mitigation funding must be seen. ESC considers that, notwithstanding the mitigation measures embedded within the Proposed Project, there will remain residual impacts on local communities, the landscape, and the local economy that cannot be fully avoided through the design of the scheme or through requirements contained within the Development Consent Order.
- 2.5 The purpose of the proposed Deed of Obligation is therefore not to duplicate or replace community benefit funding, but to secure mitigation measures and financial support in response to those residual impacts.
- 2.6 This reflects the scale, duration and geographic extent of the Proposed Project, and the consequential effects experienced by communities throughout the construction phase and beyond.
- 2.7 ESC restates its position that a Deed of Obligation is required to secure mitigation measures for the residual impacts of the Proposed Project. Such measures are necessary both in the short to medium-term during the construction period, when communities will experience the direct disruption, and in the longer-term following completion of construction, where lasting effects on communities, the landscape, and the local economy may continue to arise.
- 2.8 Whilst ESC welcomes the Applicant's proposed Community Fund as a source of community benefit, it does not consider that this Fund addresses or compensates for the residual impacts of the Proposed Project and therefore does not remove the need for a Deed of Obligation to secure appropriate mitigation measures.

- 2.9 Specifically in relation to ESC's request for Community Mitigation Payments to fund an Environmental Protection Officer, ESC acknowledges the Applicant's position that the Proposed Project is not predicted to give rise to significant noise effects during either the construction or operational phases. Whilst the Applicant suggests that the predicted noise and vibration impacts are likely to be limited, the absence of predicted significant effects does not eliminate the likelihood of ESC receiving noise and vibration complaints from local communities, particularly during the project's construction phase. ESC's experience of major infrastructure projects has shown that concerns can and do arise even where measured levels remain below relevant thresholds.
- 2.10 In such circumstances, ESC is required to investigate complaints, undertake monitoring activities, assess compliance with agreed commitments, and communicate findings to affected residents. These activities can, and often, involve significant officer time and specialist equipment resources, regardless of whether a non-compliance is ultimately identified.
- 2.11 Furthermore, there is likely to be a significant community engagement requirement associated with responding to enquiries, providing reassurance to residents, and maintaining confidence in the effectiveness of the project's mitigation measures. The Planning Performance Agreement proposed by the Applicant is limited to supporting the Council's engagement in the development and review of the Noise and Vibration Management Plan and does not provide funding for ongoing monitoring, investigation, enforcement, or community liaison activities that may be required throughout the life of the project.
- 2.12 Given that ESC understands that, under current proposals for the DESNZ Post-Consent Unit, responsibility for ongoing monitoring of discharged DCO requirements is to remain with the host local authorities, ESC maintains its position that funding should be secured for an Environmental Protection Officer role to ensure the Council has sufficient capacity to respond effectively to noise and vibration concerns, undertake appropriate monitoring and compliance activities, and support local communities throughout the construction and operational phases of the Proposed Project.
- 2.13 With regards to coastal erosion monitoring, whilst ESC agrees that monitoring should be undertaken by the Project, ESC does have some concerns in relation to the Outline In-Principle Monitoring Plan [\[REP7-167\]](#) as currently drafted.
- 2.14 ESC acknowledges that the Outline In-Principle Monitoring Plan [\[REP7-167\]](#) is only an outline document, with further detail to be agreed with the MMO through approval of the final Monitoring Plan via a discharge of Condition 15(4) of the deemed Marine License. However, ESC considers that the commitment in paragraph 3.2.8 (MPE06) of the outline Plan to monitor beach profiles and erosion rates at the Suffolk landfall during the operational lifetime of the project is currently too vague.
- 2.15 ESC notes that greater detail has been provided by the Applicant in relation to monitoring of the River Stour Channel at the Kent landfall (Pegwell Bay), for which clear annual survey intervals and a 50m trigger distance for consultation with the Environment Agency have been committed to. Monitoring details for the Suffolk

landfall lack defined survey frequencies, a minimum monitoring duration, and specific triggers to capture episodic or post-storm erosion. Given how dynamic this frontage is, monitoring cannot rely solely on widely spaced baseline intervals

2.16 ESC requests that the Monitoring Plan at the Suffolk landfall commits to:

- An annual, nearshore bathymetric survey that not only covers the exit location, but a radius of ~200m radius around it (i.e. north, east, south) and as shallow as can possibly be collected landward of it.
- Continuous topographic monitoring (i.e. drone-based LiDAR) of the HDD route, taken at low tide and hence covering as much of the intertidal zone as possible. This should be undertaken on an annual basis for at least 3 years after construction (and henceforth every 5 years if the difference models show no significant change) and analysed via comparison to the baseline survey pre-construction.
- If the bathymetry and topography show changes in surface levels that are above a given threshold (i.e. more than the anticipated and characteristic rate of shoreline change – which needs to be defined), then the frequency of surveys needs to be increased. If a defined trigger level for beach lowering is met, then the mitigation plan will be implemented after consultation with the key coastal stakeholders.

2.17 ESC appreciates that this detail can be provided in the detailed Monitoring Plan, but given that ESC's jurisdiction extends to the Mean Low Water Springs mark, ESC requests that:

- ESC is provided with copies of the monitoring reports and summary beach profile results within an agreed timeframe following each survey. Raw survey files are not required as ESC already collects regular UAV-LiDAR data over the landfall frontage, but sight of the project's formal monitoring reports and profile assessments will allow ESC to cross-reference the findings against its own coastal baseline data.
- ESC is named as a formal consultee to the MMO for the approval of the detailed post-consent Monitoring Plan via a discharge of Condition 15(4) of the deemed Marine License. This ensures ESC can review and agree upon survey profiles, methodologies, and trigger thresholds so that they complement existing local monitoring efforts.

3. ESC's comments on the Applicant's response to the Secretary of State's question in relation to design of the converter station

3.1 ESC has reviewed the Applicant's response to Item 13 of the Secretary of State's Request for Information.

3.2 ESC welcomes the Applicant's reference to co-ordination with LionLink and strongly encourages the Applicant to engage further with ESC and other stakeholders

throughout the development of the converter station design. With appropriate coordination and commitment, the vision of a converter station site, that is also a significant environmental and community asset, can be fully realised.

3.3 ESC has no further comment to make.

4. ESC's comments on the Applicant's responses to the Secretary of State's questions in relation to dormouse surveys

4.1 ESC has reviewed the Applicant's response to Item 21 of the Secretary of State's Request for Information in relation to dormouse survey methodology.

4.2 ESC wishes to clarify that, whilst ESC did consider that the risk of dormice being present was low prior to the project's surveys being undertaken, ESC did not consider that it was impossible. Contrary to the Applicant's claim, a historic record of dormouse does exist from a location approximately 330m to the west of the western edge of the Order Limits.

4.3 With regard to the Applicant's stated survey scores for each survey area (as summarised in response to Item 21 of the Secretary of State's Request for Information), as set out in paragraph 7.2.2.4 of ESC's Local Impact Report ([\[REP1-128\]](#)), ESC does not consider that the stated scores were achieved in Zone D (where the potential dormouse nest record was made). The scoring calculation set out in Table A.2 of the Hazel Dormouse Survey report [\[APP-108\]](#) includes 0.84 points for October 2023; however, the nest tubes were only installed in Zone D4 between 23 October and 27 October 2023 meaning that the majority of the month was missed (and none were installed in Zone D3 until April 2024). October 2023 can therefore not be counted in the total points score as the whole month was not surveyed. Also, the survey scoring includes results from October 2024 (for some of the tubes in Zone D3 only), however the survey was undertaken at the start of the month (8th/9th October 2024) meaning that the whole month was not covered. These deficiencies suggest that an actual score of between 19.26 (excluding October 2023) and 18.66 (excluding October 2023 and October 2024) is more accurate for Zone D. ESC maintains its view that this is below the minimum level of effort that the best practice guidance in place at the time recommended was needed to establish presence/absence.

4.4 ESC welcomes the Applicant's confirmation that an updated survey is progressing in Zone D using the survey methodology from the latest best practice guidelines.

5. ESC's comments on Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk (Tracked) (Version F)

5.1 ESC supports the additions made to the Suffolk Outline Landscape and Ecological Management Plan and has no further comments to make.

6. **ESC's comments on the Applicant's responses to the Secretary of State's questions in relation to socio-economics and tourism**

Item 43 in relation to the Skills, Supply Chain and Employment Plan (SSCEP)

- 6.1 ESC defers detailed comments on the Applicant's response to Item 43 of the Secretary of State's Request for Information to Suffolk County Council (SCC). However, ESC wishes to make it clear its expectation that the Applicant fully delivers the commitments set out within the SSCEP.
- 6.2 ESC agrees that the Proposed Project presents an opportunity to "maximise the positive gain for the local community". However, these benefits will only be fully realised through effective alignment, structured engagement, and coordinated working with the local organisations identified in the Applicant's response.
- 6.3 Without such collaboration, any attempts to "*maximise skills, employment and supply chain opportunities arising from the Proposed Project*" (paragraph B.3.20) are unlikely to be realised to their full potential.

Item 44 in relation to the tourism

Introduction

- 6.4 ESC welcomes the Applicant's further consideration of tourism and visitor economy matters. However, ESC does not consider that the Applicant's response to Item 44 fully addresses the Secretary of State's question, particularly in relation to how potential impacts will be minimised, how benefits will be maximised, and what practical mechanisms will be put in place to achieve this.

Assessment of effects on tourism and the visitor economy

- 6.5 ESC is disappointed that, despite ESC's concerns and the evidence it provided during the Examination regarding impacts on visitor perception and the finite capacity of the visitor accommodation sector (for example, in [\[REP4-184\]](#)), the Applicant maintains that '*the Proposed Project will not give rise to significant adverse effects on tourism or the visitor economy in either Suffolk or Kent, whether considered alone or cumulatively with other NSIPs*'. Notwithstanding ESC's objections to this conclusion, ESC does not consider that this provides sufficient justification for adopting such a limited and reactive approach to mitigation.

Visitor perception

- 6.6 ESC is particularly concerned regarding the Applicant's treatment of visitor perception. The Applicant states that it has reviewed evidence from other NSIPs and concludes that concerns about visitor perceptions have not translated into measurable reductions in visitor numbers or tourism employment.
- 6.7 Visitor perception is not simply an alternative way of measuring visitor numbers; it is an important leading indicator of destination attractiveness and future visitor behaviour. A visitor does not necessarily need to cancel a holiday or reduce expenditure for a perception impact to be real. Decisions about where to visit are influenced by the overall experience of a destination, including accessibility, congestion, the quality and availability of services, the natural and built environment,

tranquillity, visual amenity and the extent to which a destination is perceived as an attractive place to spend leisure time.

- 6.8 This is particularly relevant in Suffolk, where the visitor proposition is strongly connected to the coast, countryside, landscape, heritage, tranquillity and the quality of the visitor experience. The Applicant acknowledges in paragraph 13.4.1 of the Suffolk Onshore Inter-Project Cumulative Effects ES Chapter [APP-060] that *‘there is the potential for significant cumulative effects for a short term and temporary period on the Suffolk Coast and Heaths AONB’*, and yet they do not acknowledge that this may impact visitor perception.
- 6.9 The experience of Sizewell C is also directly relevant and should not simply be discounted because it has not, to date, produced a clear measurable reduction in visitor numbers.
- 6.10 The Sizewell C assessment itself recognised concerns raised by stakeholders about construction traffic, increased journey times, environmental effects and perceptions of the coast and AONB potentially deterring visitors now and in the future. Sizewell C subsequently recognised the importance of understanding the extent to which the project could affect the perceived attractiveness of the area to tourists, and commissioned visitor research to inform monitoring and mitigation.
- 6.11 Importantly, the Sea Link Applicant has previously cited the Sizewell C visitor perception survey in its Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065], acknowledging that 39% of respondents indicated that they might be discouraged from visiting the local area during construction. ESC therefore finds it difficult to reconcile the Applicant’s current position that perception does not warrant meaningful mitigation with the approach taken for Sizewell C, where the potential for perceived changes in visitor behaviour was sufficiently recognised to justify a dedicated Tourism Fund and ongoing monitoring.
- 6.12 ESC strongly encourages the Applicant to consider the evidence and lessons emerging from Sizewell C rather than relying principally on historic experience from individual projects elsewhere. The Sizewell C assessment recognised that it was difficult to draw firm conclusions from hypothetical visitor perception surveys, but it nevertheless recognised the potential risk to tourism and established a mechanism through which that risk could be monitored and mitigated.
- 6.13 That is a more precautionary and appropriate approach than concluding that, because a measurable decline in visitor numbers has not been demonstrated, no meaningful mitigation is required. The fact that visitor perception is difficult to translate immediately into a measurable change in visitor numbers is precisely why it should be monitored as an early-warning indicator, rather than being dismissed.
- 6.14 ESC’s most recent review has found that over half of current audiences (older individuals (66% are over 45), and day trippers) visit repeatedly (20 or more times in the last 18 months), demonstrating that repeat visitors are a core part of maintaining East Suffolk’s economy. Negative visitor experiences resulting in a reduction in repeat visitors therefore presents an unacceptably high risk to the East Suffolk economy.
- 6.15 The Applicant’s current response does not sufficiently explain:

- what visitor perception measures it will monitor; or if it even will measure this;
- how changes in visitor perception will be identified;
- what baseline will be established;
- how Sea Link's impacts will be distinguished from those of other NSIPs;
- what cumulative indicators will be monitored;
- what thresholds or triggers would result in intervention;
- who will be responsible for initiating mitigation;
- what mitigation measures would be available; or
- how and when the effectiveness of those measures would be reviewed.

- 6.16 Simply stating that matters will be 'discussed' with ESC, Suffolk County Council (SCC), the Destination Management Organisation (DMO) and Local Visitor Economy Partnership (LVEP) clearly does not provide sufficient certainty, as discussed further below.

Reliance on engagement with stakeholders, rather than firm mitigation commitments

- 6.17 The Applicant's response appears to place considerable reliance on ongoing liaison with ESC, SCC, the DMO, and LVEP, with the scope, frequency and nature of engagement to be agreed collaboratively. Whilst engagement with these stakeholders is important and welcomed, liaison and discussion are not, in themselves, 'mitigation'. There needs to be a clearer commitment from the Applicant as to what it will monitor, what indicators will be used, what would constitute a trigger for intervention, and what measures it will implement if evidence of adverse impacts emerges.
- 6.18 Sizewell C's published assessment explicitly identified a Tourism Fund as a potential mechanism to respond to tourism impacts, providing funding for purposes including marketing and promotion, support for local projects, visitor surveys, responses to effects on sensitive attractions, and development of a tourism strategy/action plan. This hasn't been acknowledged anywhere within the Applicant's response. There is a cost associated with stakeholders meeting to '*discuss how potential impacts on tourism within Suffolk could be minimised and benefits be maximised*', and even further costs of any associated action. ESC queries how stakeholders' engagement will be funded, and is concerned that the Applicant is relying on existing 'management' or mitigation to enable this. ESC also recommends that the Applicant prepares a forward-looking stakeholder engagement plan that sets out the proposed programme of meetings, identifies key participants, and establishes priority themes for discussion and review throughout the construction phase of the Project.

Worker accommodation

- 6.19 The proposed monitoring of worker accommodation is welcomed, but the response is again largely framed around monitoring and discussion rather than intervention.

- 6.20 The Applicant proposes to establish where workers are staying and discuss potential actions with ESC, the DMO and LVEP where required. However, given the known pressure on accommodation arising from major infrastructure projects in East Suffolk, there should be greater clarity around the circumstances in which action would be taken.
- 6.21 The availability and cost of visitor accommodation directly affects the capacity of the tourism economy, particularly during peak periods.
- 6.22 The Applicant has again failed to indicate how it will consider/monitor:
- displacement of visitor bookings by construction workers;
 - reductions in availability during peak visitor periods;
 - changes in accommodation pricing;
 - impacts on different accommodation sectors;
 - geographic displacement of visitors;
 - cumulative demand from multiple construction workforces; and
 - whether intervention is required.
- 6.23 ESC also continues to request that a co-ordinated, enforceable Workforce Accommodation Strategy is secured through a DCO Requirement. This would require the Applicant to work with other major projects in the District, including Sizewell C, to plan, manage and, where necessary, provide appropriate worker accommodation in a co-ordinated manner. Without such a mechanism, there is a clear risk of unregulated competition, block booking, and price inflation, all of which would adversely affect the availability of accommodation for visitors. ESC has provided suggested wording for such a Requirement in response to Issue Specific Hearing 3 Action Point 1 [\[REP6-161\]](#).

Construction worker spend vs visitor spend

- 6.24 The Applicant refers to potential benefits arising from construction worker expenditure in local businesses and restaurants. ESC recognises that construction expenditure can generate economic benefits, but it does not automatically offset impacts on visitor numbers. There is a fundamental difference between additional construction-related expenditure and expenditure generated by leisure visitors. ESC strongly objects to the suggestion that a token voucher for a sandwich shop will offset the potential risk of a visitor either not coming, or coming and having a negative experience and so not returning.
- 6.25 The Applicant should therefore provide greater clarity on how it intends to maximise and retain the benefits of construction-related expenditure locally, rather than simply stating that such expenditure *may* occur.
- 6.26 Although there is no way to prove this is workers, spend data is showing a higher number of, and lower value, transactions in Leiston and Saxmundham.

Cumulative impacts

- 6.27 East Suffolk is not a blank canvas. The visitor economy is already operating alongside Sizewell C and other major infrastructure projects, with further NSIPs proposed or under construction. The issue is therefore not simply whether Sea Link, considered in isolation, is capable of causing a measurable reduction in visitor numbers. The relevant question is whether the availability of accommodation and services, changes to the visitor experience, and additional disruption, visual change, construction activity, traffic, and workforce pressures associated with Sea Link could contribute to a cumulative deterioration in the attractiveness and accessibility of the destination. ESC notes that SZC has become the first to acknowledge the need for a coordinated approach to addressing cumulative impacts of many major infrastructure projects in East Suffolk through allocation of additional funding by establishing a Community Interest Company.¹
- 6.28 **There is a fundamental difference between assessing Sea Link as an individual project and considering the experience of the destination during a period of unprecedented infrastructure construction. This is important because the absence of evidence of significant harm from one project does not in any way demonstrate the absence of cumulative harm from several projects operating concurrently.**

ESC's overall position

- 6.29 ESC remains concerned that the Applicant's approach is too narrow in scope, too reliant on liaison, and insufficiently committed to proactive mitigation and monitoring.
- 6.30 ESC is particularly concerned that the Applicant's conclusion that there will be no significant effect is being used to justify doing little until an adverse effect is demonstrated. **Retrospective action after the damage is done (which could take many years to recover) is repair, not mitigation.**
- 6.31 The circumstances in East Suffolk are unusual. There are multiple major infrastructure projects being delivered within a relatively concentrated geographical area and over overlapping periods. The visitor economy is therefore operating in circumstances that are materially different from those against which individual historic projects elsewhere may have been assessed.
- 6.32 The approach should consequently be one of active monitoring, early identification of emerging impacts, and the ability to intervene, rather than a reliance on the absence of historic evidence of measurable tourism decline.
- 6.33 ESC therefore encourages the Applicant to strengthen its commitments by providing **a defined tourism and visitor economy monitoring framework**, including agreed indicators, baselines, annual/quarterly reporting arrangements, cumulative monitoring, and clear triggers for intervention, together with a commitment to develop and implement appropriate mitigation measures where monitoring identifies emerging impacts. This should cover visitor perception, visitor numbers,

¹ <https://www.sizewellc.com/news-views/sizewell-c-agrees-to-be-the-first-funder-of-a-new-community-interest-company/>

accommodation availability/pricing, visitor spend, footfall, traffic/accessibility, and destination sentiment and perception studies including a focus on cumulative NSIP activity. All of these are being brought in as part of the SZC mitigation approach. This can be done via the existing SZC Tourism Fund mechanisms already in place, but a financial contribution towards that would be required, as neither SZC nor the East Suffolk taxpayer should not be expected to fund Sea Link mitigation.

- 6.34 This would provide considerably greater confidence that the Applicant is genuinely seeking to avoid, minimise and respond to impacts, rather than relying on local authorities and tourism organisations to identify the problem and develop the response after the event.

7. ESC's comments on the Applicant's response to the Secretary of State's proposed wording for an operational noise DCO Requirement

- 7.1 ESC has reviewed the Applicant's response to Section 55 of the Secretary of State's Request for Information in relation to an operational noise DCO requirement. ESC understands that the Applicant is largely satisfied with the Secretary of State's proposed wording, save for the reference to Work No. 1B, which the Applicant considers should be excluded. The justification provided by the Applicant is that as the Transfer of Benefit Agreement with East Anglia TWO Limited has been completed, the substation will be constructed and operated pursuant to the EA2 DCO, and so reference cannot be made to Work No. 1B in the Sea Link DCO.
- 7.2 ESC does not understand this justification, noting that the Applicant itself stated during the Examination in response to Issue Specific Hearing 1 Action Point 5 [\[REP1-124\]](#) that the completion of a transfer of benefit agreement is not the only pre-requisite to provide reassurance that the substation will be built out and operated under the EA2 DCO as anticipated. ESC therefore continues to request that all operational noise rating levels are secured via a DCO Requirement, rather than a REAC measure.
- 7.3 The Applicant's response does not change ESC's position, as communicated in ESC's response to the Secretary of State's Request for Information. ESC remains concerned by the proposed operational noise rating levels for the Suffolk converter station site and considers that the proposed 34 dB rating level has not been adequately justified by the Applicant, nor has it been satisfactorily demonstrated that this level is policy-compliant. ESC also continues to request that the DCO Requirement requires that the undertaker demonstrates to the relevant planning authority that the lowest reasonably practicable operational noise levels have been achieved, thus ensuring that further reductions are achieved at detailed design stage if it is reasonably possible to do so.

8. **ESC's comments on the Applicant's draft Development Consent Order (Version K)**
- 8.1 ESC notes that Requirement 21(2) mistakenly cross-refers to Requirement 19(1), rather than Requirement 21(1).