Suffolk County Council

SEA LINK

EN020026

Comments on Responses to Request for Information

Suffolk County Council

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Glossary of Acronyms

AIP	*Approval in Principle*
BNG	*Biodiversity Net Gain*
DESNZ	*Department for Energy Security and Net Zero*
DCO	*Development Consent Order*
EIA	*Environmental Impact Assessment*
HRA	*Habitat Regulations Assessment*
MMO	*Marine Management Organisation*
NPS	*National Policy Statements*
NSIP	*Nationally Significant Infrastructure Project*
oLEMP	*Outline Landscape and Ecological Management Plan*
REAC	*Register of Environmental Actions and Commitments*
SSCEP	*Skills, Supply Chain and Employment Plan*
SSSI	*Site of Special Scientific Interest*
UXO	*Unexploded Ordnance*

"The Council" / "SCC" refers to Suffolk County Council.

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide comments on the responses to the Secretary of State's Request for Information issued following the close of the Sea Link Examination.

Examination library references are used throughout this document to assist readers. SCC has not sought to repeat previous representations and has instead taken an approach of providing further information where appropriate.

Comments on Responses to Request for Information

Comments on C1-178 - Responses to Secretary of State's consultation 1 - 9.158 Applicant's Response to SoS Request for Further Information Letter

Ref. No	Topic	Summary of submission	SCC Response
Design			
13	Favoured converter station design options and policy compliance	The Applicant maintains that the Sea Link project complies with the good design requirements of National Policy Statements (NPS) EN-1 and EN-5 through a design-led approach that extends beyond building appearance to include site selection, landscaping, ecological mitigation, and environmental management. The four design options presented mainly concern architectural features such as layouts, cladding and roof forms, and flexibility is retained to allow detailed design to respond to technical requirements, contractor input, and stakeholder feedback.	SCC's position on design has been made clear throughout the examination and is not rehearsed here. However, SCC would like to emphasise that coordination and collaboration with Lion Link is critical in order for good design to be achieved, both in terms of the design of the physical infrastructure and the site as a whole. SCC has made this point in submission such as its Local Impact Report [REP1-130] and item 9.5.4 of its post-hearing submission following ISH 2 [REP4-150]. Whilst the Applicant does have a commitment stating that coordination will be sought with Lion Link in terms of design of the converter station site, the extent and nature of this commitment lacks detail and appears to be limited to date.

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		The emerging preference is for a simple baseline design for the converter station buildings. The Applicant considers this the most effective approach for minimising height and massing, integrating the development into the rural landscape and reducing visual prominence. More complex options, particularly curved roofs, are considered likely to increase building height, create engineering challenges and diminish the intended visual benefits. Green and blue roofs are also unlikely to be taken forward because of increased structural loading, maintenance demands, operational risks associated with water retention, potential fire risks during drought conditions and the lack of proven examples at converter stations. Overall, the Applicant concludes that the baseline design provides the most practical, deliverable, and policy-compliant solution.	Should the Secretary of State be minded to do so, SCC would support an improved commitment within the Design Principles [C1-191] which requires the Applicant to use reasonable endeavours to gain up-to-date information on Lion Link's proposals prior to making submissions under Requirement 3 for the converter station to ensure that coordination outcomes are based on the most recent information possible, rather than outdated proposals. Of course, SCC recognises that coordination with third parties is not entirely within the Applicant's control; however, this does not prevent the Applicant from seeking to maximise coordination and collaboration for its part. In this respect, SCC further considers that the Applicant should be fully pro-active in sharing their own design vision with the co-located project of Lion Link to help inform their design choices.

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Water Environment			
38.	Suffolk drainage design change and flood risk tests.	In case it aids the Examining Authority and others, the Applicant would note that this discussion concerns the temporary drainage feature along the haul road, for the cable route east of Saxmundham Converter Station. The wording of the requirement suggested by SCC in [REP-368] was taken from text proposed by the Environment Agency that incorrectly referenced a different drainage feature to the west of the Converter Station, and therefore also referenced different works (namely the access road to the Converter Station). The principle of the Requirement was added to the REAC by the Applicant at Deadline 7 (Application Document 9.84(F), commitment W39 [REP7-359]), referencing the correct drainage feature and associated works. At the request of the Environment Agency, this commitment has now been introduced as a requirement in the draft DCO and accordingly deleted from the REAC. It is	SCC is content with the requirement wording which has been incorporated into the DCO and agrees that the commitment is more suited as a requirement rather than a REAC commitment due to the need for an approval to be acquired.

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		hoped that this requirement satisfies SCC's request for a requirement in REP7-368.	
Traffic and Transport			
39.	Benhall Railway Bridge structural survey.	The Applicant states that approval of the rail crossing Approval in Principle (AIP) has been delayed despite submission to Suffolk County Council (SCC) Highways in October 2025. Following multiple follow-ups, reviews and revisions, SCC provided comments in April, June, and July 2026, with a revised final version submitted on 1 September 2026 and a response awaited. In contrast, the same AIP submitted to Network Rail in October 2025 was agreed by December 2025. Once SCC approval is obtained, the Applicant will arrange a meeting with SCC and Network Rail to agree survey dates and approval procedures for associated risk assessments and method statements. LionLink representatives will also participate in the survey.	The Applicant has been made aware of the unprecedented demands being made on the Structures Team to manage structures on the A12 and other routes used by or proposed to be used by NSIPs to move AILs. Priority has been given to resolving issues for consented schemes. SCC has taken the lead on engaging with Undertakers including Sealink to attempt to coordinate review, assessment and delivery of any resultant strengthening of structures needed to support NSIPs and look for the Applicants support in this. Currently, the A12 south of Yoxford is subject to a 12.5 tonne axle limit on two structures (Littel Glemham and Kelsale Culverts), this being a relaxation subject to improvements being delivered before May 2027 and no deterioration in their condition before that time. North of Yoxford is subject to a limit of no greater than STGO1 vehicles

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			(in terms of weight) awaiting additional assessment of the structures on this route by Undertakers. As noted above, any AIL movements for this project are subject to access being possible via the A12 regardless of the state of Benhall Bridge. The definition of AIL also includes all vehicles in excess of the C&U regulations (ie>44 tonnes), not just mobile cranes, piling rigs, cable drums or transformers but such movements as low loaders with construction plant. <u>Junction Modelling</u> SCC has offered to have discussions with the Applicant on the matter of Junction Modelling both in terms of scope, what the applicant has provided and SCC's review of this information. SCC remains of the opinion that the modelling in terms of scope and content remains deficient. SCC would like to highlight that the review of the Applicant's junction modelling commissioned by SCC was submitted to be sent across to the Secretary of State on 20th August 2026.

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Human Health and Wellbeing			
42.	Process and sharing welfare concerns.	The Applicant has reworded commitment HW03 within Application Document 9.84 (G) Register of Environmental Actions and Commitments (REAC) submitted in response to the Secretary of State's letter.	SCC (Public Health) notes that the Applicant has incorporated within Application Document 9.84 (G) Register of Environmental Actions and Commitments (REAC) the additional wording contained within the Secretary of State's Request for Information (RFI) regarding commitment HW03. SCC also recognises that the additional wording provided within the RFI was presented by the Secretary of State as draft wording upon which parties were invited to comment, rather than as a recommended or final form of wording. SCC welcomes the principle of a mechanism for recording and responding to concerns raised by local communities and sharing relevant concerns with Councils. SCC does not however consider that the current wording of HW03 within version G of the REAC provides sufficient assurance as to how concerns will be considered, responded to, and used to inform ongoing mitigation and engagement activities. Whilst the commitment establishes a mechanism for recording and sharing information,

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			it provides limited detail regarding the scope of concerns to which it applies, the process for reviewing and responding to concerns raised, the identification of recurring themes or emerging issues, and how information gathered through the process will be used to inform mitigation, community engagement, or other corrective actions where they may be appropriate. SCC considers this necessary due to the possibility that concerns raised may indicate evidence of materially new or different environmental effects in terms of impacts on health and wellbeing which would require corrective action. It should be noted that the proposed commitment is not sufficient to address the outstanding concerns summarised in paragraphs 3.19 to 3.27 of [REP7-367]. SCC further notes the comments submitted by East Suffolk Council [C1-056] regarding the practical operation of the commitment, including clarification of the “established process” and the arrangements for sharing information with local authorities in a manner that is consistent with data protection requirements. SCC supports East

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			Suffolk Council's comments and considers that further clarity regarding the established process and associated information sharing arrangements would assist in ensuring that the commitment is capable of being implemented effectively in practice. SCC remains of the view that HW03 should provide greater detail. SCC's previously submitted suggested amendments remain its preferred drafting and in SCC's view, would provide a more robust mechanism for ensuring that health and wellbeing concerns raised by communities are not only recorded, but appropriately considered, acted upon where necessary, and used to inform ongoing mitigation and engagement activities. For reference, our suggested wording is: - "The undertaker has an established process of recording and responding to potential ~~welfare~~ *health and wellbeing concerns* raised with the undertaker. This information shall be shared with the relevant district and county councils when concerns are recorded~~.~~*, together with details of any proposed response, action, investigation, or other*

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			mitigation deemed appropriate by the undertaker. Records of concerns shall be collated, categorised, and reviewed periodically to identify emerging patters, recurring issues, or potential cumulative impacts, with outcome reports shared with the relevant district and county councils. Where consent is given by the individual, and the potential concern is also relevant to Scottish Power Renewables ("SPR"), the undertaker will share the minimum level of detail necessary with SPR, to allow both developers to respond accordingly *and to coordinate any appropriate mitigation measures*. This process also applies in reverse."
Socioeconomics and Tourism			
43.	Detail in the Skills, Supply Chain and Employment Plan.	The Applicant maintains that the final **Skills, Supply Chain and Employment Plan (SSCEP)** is proportionate, policy compliant and sufficiently detailed. It disputes suggestions that the document should be treated as an outline plan, arguing that the SSCEP is not intended as mitigation for socio-economic, tourism or recreational	SCC welcomes the additional commitments secured through the SSCEP, including engagement with the Regional Skills Coordination Function (RSCF), support for local recruitment and apprenticeships, promotion of local and regional supply chains, and the commitments secured through Requirement 5. However, SCC remains concerned that the response does not provide

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		impacts but as a mechanism to maximise positive benefits for local communities. The plan was prepared after contractors were appointed, enabling contractor input to be incorporated earlier than is typical for nationally significant infrastructure projects. The Applicant states that the SSCEP contains clear actions, delivery arrangements, and timescales capable of implementation after consent, while allowing flexibility for contractor-specific details to evolve during project delivery.	sufficient confidence regarding how workforce, skills and supply-chain outcomes will be monitored, managed, and reported throughout project delivery. The Council's principal concern is not whether a skills plan exists, but whether the proposed governance and monitoring arrangements are robust enough to maximise workforce opportunities, identify emerging labour market pressures, and secure the intended socio-economic legacy benefits as summarised in paragraphs 3.31 and 3.32 of [REP7-367]. While SCC accepts that Sea Link is not anticipated to give rise to significant adverse socio-economic effects and recognises the challenges associated with detailed forecasting of cumulative labour market impacts, the Council considers that the SSCEP would benefit from greater clarity on how workforce, employment, apprenticeship and supply-chain outcomes will be measured, monitored and reviewed, and how information gathered through delivery and stakeholder engagement will be used to identify and respond to emerging workforce pressures. SCC also considers

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			that the Plan is weighted towards activities and engagement mechanisms rather than measurable outcomes, with limited detail on success indicators, reporting arrangements, lessons learned, and the monitoring of local supply-chain participation and wider economic benefits. Accordingly, SCC considers that the Applicant's response would provide greater confidence if it included a clearer framework for monitoring, reporting and reviewing workforce, skills and supply-chain outcomes throughout project delivery, including mechanisms for tracking performance against commitments and responding to emerging delivery challenges where necessary.
44.	Mitigation and benefits relating to tourism.	The Applicant concludes that the Sea Link project will not result in significant adverse effects on tourism or the visitor economy in either Suffolk or Kent, either alone or cumulatively with other infrastructure projects. Evidence from assessments and comparable NSIP schemes suggests that concerns about visitor perceptions do not	While Sea Link alone may not result in "significant adverse effects on tourism," SCC have been keen to stress that the cumulative impact and effects of multiple simultaneous NSIPs are potentially significant. Whilst SCC has recognised that the contribution of Sizewell C to this cumulative impact is greater than Sea Link's, this does not entail that the Applicant is not required to follow the mitigation hierarchy for its contribution to this significant

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		translate into measurable impacts on visitor numbers, spending, or tourism employment. Nevertheless, the Applicant has committed to measures aimed at minimising potential impacts and maximising local benefits during construction. Through commitments SE04 and SE05, it will work with local authorities, tourism bodies, and businesses to identify appropriate actions, such as encouraging workforce spending in local businesses and monitoring worker accommodation patterns. Where necessary, measures may be introduced to reduce pressure on tourist accommodation and support local economic activity. The Applicant favours a flexible approach rather than prescribing specific measures in advance, arguing that effectiveness will depend on local circumstances and stakeholder feedback. In addition, a community fund of more than £2 million will be established to support local projects and economic benefits in Suffolk and Kent.	cumulative effect, especially when considering the presence of multiple other NSIPs contributing to this cumulative impact such as Lion Link and EA1N and EA2. The steps outlined are encouraging especially the commitment to work with local and regional tourism bodies and organisations. However, SCC maintains its position set out in paragraphs 3.10 to 3.17 of [REP7-367] as many of the concerns set out there are not addressed by these commitments, such as the need to contribute to and build upon Sizewell C's tourism monitoring and mitigation measures in a coordinated way given the increased level of impact caused by Sea Link. It is also encouraging to see some of the suggested Sizewell working practices being considered. SCC maintains that the tourism accommodation monitoring commitment should include proactive measures to prioritise avoiding adverse impacts rather than solely relying on reactive measures as summarised in paragraph 3.18 of [REP7-367]. There still appears to be some confusion around the purpose and function of the Community Fund. Its

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			role is, as the name suggests, more pertinent to the community than to the visitor economy and it should not be relied upon for anything related to tourism mitigation/ compensation. It is the project's Community Benefits fund which, as stated in the government's guidance, sits entirely outside the planning balance.

SCC Response
Harmonics
SCC notes that several submissions have been made by stakeholders raising concerns over the contents of the Project Assessment consultation carried out by Ofgem which ended on 29 September 2026. The consultation document states that further measures are needed to manage harmonics which otherwise would compromise the functionality of the project in terms of the 2 GW transmission capacity. The consultation document also states that further measures elsewhere on the transmission network will be necessary. Ofgem states that harmonics studies, and evaluation of potential solutions, are ongoing. SCC shares concerns that the solution to this issue may require additional infrastructure not included in the application in order for the project to function at the required 2 GW capacity. SCC understands that the synchronous condenser at Yaxley substation was added a later date for similar grid stabilisation reasons. As such, should similar additional infrastructure be needed, it is SCC's understanding that it would need to be located in close proximity to the Kiln Lane substation near Friston. Unlike at the time that substation was consented under the SPR DCOs, harmonics concerns and the potential for additional infrastructure at the substation site being necessary is foreseeable in relation to the Sea Link decision. The Kiln Lane substation site is highly constrained, as evidenced by the proximity of dwellings and the need to preserve the integrity of mitigation planting and surface water drainage structures agreed under the SPR consent. As a result, the substation design is a gas-insulated substation to reduce its footprint. Furthermore, the SPR DCOs specifically limit National Grid's permitted development rights where such development will impact on mitigation planting and drainage features to ensure the mitigation measures considered necessary to make the project acceptable in planning terms could not be undermined. SCC advocated for the inclusion of this provision in the DCO in item 18 of [REP6-237]. Whilst it is understood that the draft Sea Link DCO does not provide consent for such additional infrastructure and so a separate planning process would be required, it is possible that such additional infrastructure may be necessary for the functioning of the proposed development.

SCC Response
Therefore, the Secretary of State may consider it appropriate to request further information from the Applicant on the status of the ongoing harmonics investigations cited by Ofgem. The purpose of this would be to ensure the Secretary of State is satisfied that they have sufficient information prior to the decision about the likelihood of additional, functionally interdependent infrastructure outside the scope of the proposed development being necessary given that harmonics concerns are not detailed in the application. Depending on what information is provided, the Secretary of State may wish to consider whether additional protections are necessary given the likely, foreseeable materially new or different environmental effects which would arise in the scenario that additional infrastructure beyond the scope of the DCO is likely to be needed for the proposed development to properly function.