



**Date:** 04 February 2025  
**Please ask for:** Bethany Rance  
**Customer Services:** 03330 162 000  
**Direct dial:** 01394 444543  
**Email:** Bethany.Rance@eastsuffolk.gov.uk

By email only

Dear Mr Pettigrew and Ms Reynolds,

**Concerns of East Suffolk Council in relation to the Sea Link project, ahead of the project's formal Development Consent Order application submission to the Planning Inspectorate**

East Suffolk Council has written this letter to urge NGET to engage constructively with East Suffolk Council on its significant concerns about the Sea Link project, in light of the project's timescale of formal submission to the Planning Inspectorate this quarter, and the emerging direction of travel from the government on the proposals for reform of the Nationally Significant Infrastructure Project consenting regime.

ESC has continuously engaged with NGET project leads to shape the project, notwithstanding our objections to the proposal, to achieve the best outcomes for our communities and environment. We have provided extensive responses to all consultations held on the project over the years of pre-application engagement. Our responses are published on our website linked below<sup>1</sup> and are not repeated here. The Council objects to the Sea Link project but is nonetheless committed to working constructively with NGET to achieve the best possible scheme, if the project were to be consented and delivered.

We have significant concerns that our issues have not been satisfactorily addressed by NGET, which has become an increasing concern given the limited time between now and submission to the Planning Inspectorate. While there has been some limited progress in response to ESC's concerns, these areas are few compared to the many outstanding issues and concerns the Council has continually raised. A key issue is the limited amount of information shared with the Council for review and response. As you approach submission, given our concerns, and the emerging

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<sup>1</sup> Statutory consultation response: [ESC-Response-to-Sea-Link-Statutory-Consultation.pdf](#)

Additional targeted consultation response: [2024.08.09-ESC-Response-to-Sea-Link-Additional-Consultation.pdf](#)

Project Update Response: [ESC-Response-to-Sea-Link-Additional-Engagement-January-2025.pdf](#)

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LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

government position on requiring better coordination with other Nationally Significant Infrastructure Project promoters locally, these concerns will need to be expressed in a more negative way through the Examination process.

We strongly advise that many of the issues we have raised are better discussed and progressed now, before the application is submitted to the Planning Inspectorate, instead of deferring discussion of these issues to formal hearings in Examination administered by the Planning Inspectorate. Doing so now would save considerable time and effort during the Examination for parties on all sides and assist with the drafting of the Statement of Common Ground.

In particular, closing out as many issues now as possible will contribute to the formulation of a comprehensive Development Consent Order, which will make a significant contribution to the smooth and timely delivery of the project, should development consent be granted.

Indeed, a key element in the Planning Reform Working Paper on the proposals to streamline infrastructure consenting is the introduction of a new duty on all parties to identify and narrow down areas of disagreement during the pre-application stage. This includes setting clear expectations on applicants to communicate openly and transparently and providing enough information to enable substantive responses to be given by consultees, to enable progress to be made. This intends to reduce the number and complexity of substantive issues that remain unresolved going into examination and decision-making, and allow for consideration of how any lack of engagement should be taken account of in accepting, examining and determining the application.

It is essential for all parties to constructively engage seeking to address and resolve issues in the interest of our communities and environment, ahead of formal submission. This project cannot, and should not, proceed with a view that identification of Sea Link as an Accelerated Strategic Transmission Investment (ASTI) project means the project can be delivered at any cost.

The Councils are supportive of the Net Zero transition and recognise the importance of projects such as Sea Link, but we have not to date been given the confidence that the delivery of the project as currently proposed and understood would not result in unacceptable harm to the local environment and the existing communities.

We therefore urge NGET, through you, to take this opportunity to work with us to resolve issues now to place the project in better stead for formal submission to the Planning Inspectorate. The issues have all been outlined in our previous responses and were listed clearly in our response of August 2024 and are appended to this letter for ease of reference. Notwithstanding the Council's position of objection, we remain committed to working with NGET in the interests of our

communities and environments, to secure the best outcomes possible for our communities and the environment.

If you wish to discuss any of the matters raised within this response further, please do not hesitate to contact us using the details above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Daly'.

**Cllr Tom Daly**

Cabinet Member for Energy and  
Climate Change  
Councillor for the Aldeburgh and  
Leiston Ward  
East Suffolk Council

A handwritten signature in black ink, appearing to read 'Philip Ridley'.

**Philip Ridley BSC (Hons) MRTPI**

Head of Nationally Significant  
Infrastructure Planning  
East Suffolk Council

## Summary of Asks

For ease of reference, a list of ESC's asks from NGET is extracted from the detailed response above and reproduced here. These are in addition to those set out at in our statutory response.

In relation to Changes to Permanent Infrastructure: Changes to the Permanent Infrastructure Planned as Part of Sea Link, including Cable Routes and Converter Stations/Substations:

- Further information about the implications for the Sea Link project from coordination with other projects
- Further engagement on the Friston substation in relation to changes to the Order Limits made to reflect the ScottishPower Renewables consents, including drainage arrangements
- Further information of and discussion on the decision to progress the western access route to the converter station site, including justification for removing the northern and southern access routes, and potential alternative routes which would not require crossing the Fromus
- Clarification on the proposed pylons and modifications/works proposed to them, around the Friston substation
- Provision of a full tree survey and arboricultural assessment for trees adjacent to the Fromus crossing for discussion
- Assessment of the ecological value of trees in the area of the Fromus crossing, including identification of potential veteran trees
- Photomontages to show the potential visual impact of the Fromus crossing in the landscape, both with and without landscape mitigation planting, including viewpoint from Hurts Hall and towards Hurts Hall from the west
- Consideration of the impact of the increase in Order Limits around Hurts Hall, including consideration of the impact of landscape mitigation planting and environmental enhancements on the significance of the Hall and its setting
- Full assessment of the impacts of the changes in relation to noise and vibration, air quality, dust, and light
- Consideration be given to private water supplies along the cable route
- Consideration be given to the positioning of joint bay locations in relation to residential receptors and appropriate mitigation where needed, also applicable to cable sealing end compounds if required

In relation to Changes to Construction and Maintenance Work: Proposed Changes to How NGET Would Build and Maintain Sea Link in Construction and Operation:

- Further consideration of the siting of construction compounds and the potential to coordinate compounds across projects, including ensuring the refined compounds remain fit for purpose and can accommodate the necessary infrastructure, including drainage arrangements
- Consideration of potential to coordinate construction accesses to the Saxmundham converter station site with other projects

- Further discussion on the core working hours for the construction period, and discussion on potential mechanisms to seek additional working hours, including the potential for works to be carried out on Saturday afternoons, Sundays, and bank holidays, and the type of activities anticipated
- Further detail on the proposals for trenchless construction methods near the SSSI and cable landfall route, including confirmation on the extent to which this method would avoid alteration to the beach profile, with regard to morphological changes to beach height across and/or along the shore
- Further discussion about the project's impact on mental health and wellbeing, including discussions on how to mitigate and compensate impacts where appropriate.

In relation to Changes to Mitigation, Enhancements, and Approach to Biodiversity Net Gain: Proposed Changes to Environmental Mitigation, and Delivery of Enhancements to the Local Environment

- Justification for the use of land for acid grassland creation and BNG
- Sufficient evidence on the suitability of the proposed site for acid grassland creation and likely success of habitat creation be provided in the ES, including proposals to monitor its effectiveness during Sea Link's construction phase
- Consideration of impacts on the setting of Hurts Hall from landscape mitigation proposals, and any impacts identified and balanced against the landscape benefits

In relation to Changes to the Strategy for Coordination: Proposed Changes to Coordination of the Construction and Operation of Sea Link with Other Planned Projects in Suffolk:

- Further consideration and exploration of all opportunities to coordinate with other projects, beyond simply co-locating infrastructure, including discussion with ESC and other stakeholders
- Exploration of potential to coordinate construction compounds with other projects
- Further consideration of and discussion on the potential to share cable routes with other projects, specifically, but not limited to, the AC cable route between the Friston substation and the converter station at Saxmundham
- Continued discussion and engagement about masterplanning the converter station site

In relation to other comments:

- Consideration of and discussion on early pre-construction planting around the Saxmundham converter station site
- Further discussions on ideas for mitigation and compensation, including potential enhancements to the existing PRoW network, and engagement with the affected communities to explore opportunities to offset or compensate impacts
- Further discussion on community benefits and compensation for communities affected by the project