

Tarchon Interconnector

Statutory Scoping Consultation Response

Suffolk County Council

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Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>AONB</i>	<i>Area of Outstanding Natural Beauty (locally known as National Landscapes)</i>
<i>ASEC</i>	<i>Asset Skills Enhancement and Capability</i>
<i>CTMP</i>	<i>Construction Traffic Management Plan</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DV</i>	<i>Dedham Vale</i>
<i>EACN</i>	<i>East Anglian Connection Node</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWF</i>	<i>Offshore Wind Farm</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SECH</i>	<i>Suffolk & Essex Coast & Heaths</i>

“The Council” / “SCC” refers to Suffolk County Council.

1. Introduction

- 1.1 These comments of Suffolk County Council (“SCC”) are in response to the statutory scoping consultation held by PINS in Spring 2026.
- 1.2 The project consists of a 1.4GW HVDC subsea interconnector between the UK and Germany. The project’s converter station is planned to connect at the proposed East Anglia Connection Node (“EACN”).
- 1.3 The proposed EACN and converter station are located approximately 2 kilometres south of the administrative boundary of Suffolk. SCC is therefore a Neighbouring Authority and a statutory consultee to the proposed development.
- 1.4 Tarchon has asked the Secretary of State for the Department of Energy Security and Net Zero for the interconnector to be considered a Nationally Significant Infrastructure Project (“NSIP”). Under the Planning Act 2008, NSIPs are developments which require Development Consent Orders (“DCO”) to be granted by the relevant Secretary of State.
- 1.5 As mentioned, SCC is a Neighbouring Authority to the proposed development and a statutory consultee. Since the proposed development is outside SCC’s administrative boundaries, SCC’s comments are restricted to matters relating to:
 - highways;
 - economic development;
 - skills, education and employment;
 - cumulative impact; and,
 - landscape.

2. SCC Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy

- 2.1 SCC adopted its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy in February 2026, setting out its overall stance on major projects. The policy is relevant for SCC’s position on the Tarchon Interconnector proposal, and states:
- 2.2 “Suffolk County Council recognises that significant new infrastructure is required to ensure energy security, deliver growth, transport resilience, jobs and prosperity, and adapt to the challenges of a changing climate faced by the UK, and the communities and environment of Suffolk.
- 2.3 However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately

recognised, assessed, appropriately mitigated, and, if necessary, compensated for.”¹

- 2.4 SCC will follow this approach in this response, and throughout the subsequent DCO process.
- 2.5 SCC considers it essential that an effective Planning Performance Agreement (“PPA”) is agreed with the Applicant although one is not in place at present. Its Energy and Climate Adaptive Infrastructure Policy states:
- 2.6 “The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council’s engagement with project promoters.”
- 2.7 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.²
- 2.8 SCC continues to be willing to work with the project’s promoter through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

3. Highways

- 3.1 SCC would be interested in seeing the Construction Traffic Management Plan (“CTMP”), specifically the HGV routes in case they include any of Suffolk’s local road network, for example the A137. We would also be interested in worker numbers and their impact on Suffolk’s local road network.
- 3.2 An Abnormal Indivisible Load (“AIL”) report will be required to be shared with Suffolk County Council if they will be using any of the Suffolk local road network, including those to the ports. Other projects in this area such as Five Estuaries and North Falls have used Harwich for their AIL deliveries.
- 3.3 SCC would defer to Essex County Council as the Local Highway Authority for this project.

¹ See Suffolk County Council’s Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy <https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf>

² See Suffolk County Council’s expectations for Planning Performance Agreements (PPAs) for Nationally Significant Infrastructure Projects (NSIPs) – Guidance for project promoters: <https://www.suffolk.gov.uk/asset-library/suffolk-county-county-councils-expectations-for-planning-performance-agreements-for-nsips.pdf>

4. Economic Development

- 4.1 Suffolk has recently published a new Economic Strategy³ and would wish to see any new initiative making a positive contribution to the document and the initiatives contained within it. SCC would expect to see the applicant outlining what actions and mitigations would occur and how the county economy could benefit as a consequence.
- 4.2 SCC would also be interested to see how the initiative would complement other ongoing or proposed NSIPs and how partners could work with initiatives such as the Suffolk Supply Chain⁴ to maximise the benefits for the county.
- 4.3 Suffolk works with neighbouring counties (including Essex) on a range of economic initiatives including GENERATE⁵ and Made Smarter⁶ to name but two. We would be keen to see how this initiative can make a positive contribution to projects such as these.
- 4.4 Tourism is a key sector for Suffolk and the East of England. As with other large-scale energy infrastructure projects, we would like to ensure that there are no negative impacts on this sector and to understand what mitigation may need to be put in place if necessary.

5. Skills, Education and Employment

- 5.1 SCC's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy– The Socio-economic Effects of NSIPs supplementary guidance sets out the Council's approach to the proportionate assessment of skills, education and employment effects arising from nationally significant infrastructure projects and informs the Council's expectations of Environmental Statements (ES).⁷

Baseline conditions

- 5.2 The ES should establish an appropriate socio-economic baseline relevant to skills, education and employment, proportionate to the scale and nature of the project. This should include a concise overview of the local and sub-regional labour market, existing employment levels, occupational structure and labour supply characteristics that are relevant to the project's anticipated workforce profile. The baseline should explicitly link these conditions to the likely workforce demands of the project, rather than providing a general area profile, and should identify current skills availability and any known constraints or gaps in sectors anticipated to be required during construction and operation.

³ <https://suffolkeconomy.co.uk/economic-strategy/>

⁴ <https://suffolksupplychain.co.uk/>

⁵ <https://generate-energy.co.uk>

⁶ <https://www.madesmarter.uk/adoption/in-my-region/east-of-england/>

⁷ <https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf>

- 5.3 In addition, the ES should describe the existing education and training infrastructure capable of supporting relevant skills development, including further education, higher education, independent training provision and apprenticeships. The baseline should not be limited to the reproduction of publicly available datasets but should provide a clear analytical foundation for understanding how the project may interact with, place demands on or create opportunities within the existing skills and education system, consistent with SCC's supplementary guidance.

Construction phase workforce and skills effects

- 5.4 The ES should assess the workforce and skills effects associated with the construction phase in sufficient detail to inform an understanding of potential impacts and opportunities. This should include identification of the distinct construction phases of the project, their anticipated duration, peak and ramp-up periods and the workforce numbers and skill sets required over time.
- 5.5 The assessment should clearly distinguish between different skill levels and occupational groups and identify the likely geography from which the construction workforce would be drawn. In line with SCC's adopted approach to NSIP socio-economic assessment, this should recognise that labour catchments and travel behaviour may differ significantly between specialist, skilled and less-skilled roles, and that these differences may have implications for local skills demand and availability.
- 5.6 The ES should consider the extent to which construction workforce requirements could be met by home-based labour and the potential implications where non-home-based labour is likely to be required. It should also examine potential effects on the existing labour market, including the risk of displacement of workers from other employers or projects, and identify any cumulative effects arising from concurrent NSIP or non-NSIP developments within Suffolk or the wider region, particularly where construction programmes may overlap.

Operational phase employment and skills effects

- 5.7 Where the project would give rise to a material operational workforce, the ES should assess the nature and scale of long-term employment opportunities, including the types of skills required and the extent to which these align with existing or emerging local and regional skills provision. Even where operational workforce numbers are modest, the ES should consider whether specialist roles or long-term employment may be strategically significant in skills or training terms.
- 5.8 Any requirements for specialist, ongoing or periodic training should be identified, together with the potential role of local education and training providers in supporting those needs. The ES should also consider whether operational

employment provides opportunities for longer-term skills development and legacy benefits for the local and regional workforce, particularly in relation to the energy sector and associated industries.

Mitigation, enhancement and skills delivery

- 5.9 The ES should set out proportionate measures to mitigate adverse skills and employment effects and to maximise positive outcomes where appropriate. This should include an assessment of potential skills and employment planning approaches, governance arrangements and engagement with SCC's Regional Skills Coordination Function, in line with the Council's adopted socio-economic policy framework for NSIPs.
- 5.10 Where relevant, the ES should explain how the project could support apprenticeships, training pathways and inclusive access to employment opportunities, and how contractors and supply chains may engage with local education and training providers. These matters should be presented as assessment considerations rather than delivery commitments at scoping stage. The ES should also outline proportionate arrangements for monitoring and reporting workforce and skills outcomes over the life of the project, recognising that employment impacts represent opportunities and risks rather than guaranteed benefits.

Cumulative and strategic considerations

- 5.11 The ES should consider cumulative skills, education and employment effects arising from the project in combination with other major developments. This is particularly important where overlapping construction programmes could place pressure on the availability of skilled labour, training capacity or local delivery partners, matters explicitly addressed through SCC's supplementary guidance on the socio-economic effects of NSIPs.
- 5.12 Conversely, the ES should also identify opportunities for coordination with other developments to support shared skills pipelines, supply-chain capacity and longer-term economic and workforce benefits for Suffolk and the wider region. This cumulative assessment should be proportionate but sufficiently robust to inform related assessments, including those concerning transport, accommodation and local services, which rely on a clear understanding of workforce numbers, skills profiles and the timing of demand.

6. Cumulative Impact

- 6.1 This part of East Anglia and hinterland is now hosting an unprecedented cluster of NSIPs. Tarchon must provide clarity on how its employment, supply chain, housing, and service pressures will interact with and compound those from nearby NSIPs.

- 6.2 Without strategic coordination between promoters, there is a real risk of over-saturating the regional workforce, skills displacement, reducing quality of service delivery, and undermining the social license to operate for all NSIPs concerned.

7. Landscape

As stated in SCC comments for the Non-Statutory Consultation (slightly updated)

- 7.1 Whilst the onshore works are proposed to be located in Essex, there is still potential for the project to impact Suffolk.
- 7.2 There is a risk that the project would have significant adverse effects on the Dedham Vale (“DV”) and Suffolk and Essex Coast and Heaths (“SECH”) Areas of Outstanding Natural Beauty (“AONB”) and potentially undermine the purposes of the designation of the designated landscapes. The scoping area for the converter station site is located approximately 550m north of the DVAONB and 600m north of the SECHAONB. SCC recognises that this is primarily a matter for Natural England, who are required to advise any future examination, and ultimately the Secretary of State, on the impacts of this project on the AONBs and the purposes of its designation. Nonetheless, SCC also has its own responsibilities in relation to the AONBs by virtue of the strengthened duties imposed by the Countryside and Rights of Way Act 2000.
- 7.3 At this stage, there is still not sufficient information about the location and design of the onshore infrastructure to conclude that it would not give rise to significant effects on designated landscapes (Suffolk and Essex Coast and Heaths AONB and Dedham Vale AONB) and SCC considers that this should be assessed as part of the Environmental Statement.
- 7.4 The Council further considers that Hedgerow as well as Arboricultural surveys should also be included for both the converter station site and the cable corridor.
- 7.5 Given the impacts of onshore infrastructure on the AONBs remain in scope, it is suggested that the applicant will also have to consider this matter in relation to cumulative impacts with other proposed onshore infrastructure, such as Five Estuaries, North Falls, and Norwich to Tilbury.
- 7.6 SCC considers that it would be reasonable and necessary for the Applicant to engage formally with both the relevant local authorities in Suffolk, and the communities they represent, to fully explain the likely effects and to outline proposed schemes of mitigation and compensation, for what appear to be potentially significant adverse effects on the Dedham Vale and Suffolk and Essex Coast and Heaths AONBs within Suffolk.

Additional comments

Figure 21-3 County Landscape Character

- 7.7 The Suffolk Landscape Character Assessment (2008) does not describe Landscape Character Areas, but landscape character types (as correctly stated in paragraph 21.5.1.11). The areas identified on Figure 21-3 County Landscape Character would therefore need to be examined within the landscape baseline assessment, in how far they are coherent with the type and where they are distinct from the type to identify their susceptibility to the scheme.

Figure 21-4 Visual Receptors and Viewpoints

- 7.8 SCC is concerned about the remaining uncertainties with regards to location of the converter station site, as the location will greatly influence the visual effects on Suffolk and the Dedham Vale and Suffolk & Coast National Landscapes.
- 7.9 It is welcome that there are currently 4 viewpoints from with the National Landscapes. Two of these are within Suffolk.
- 7.10 Viewpoint 10: This location appears to be located at a PRoW (turning south from the A137), which is quite well vegetated and may not offer open views towards the converter station site. The location for this viewpoint will need to be fine-tuned, once the ZTVs are available.
- 7.11 Viewpoint 19: The location, where the PRoW leaves the road towards the south-west and open views can be experienced, appears to be a good location, subject to further information such as ZTVs.
- 7.12 SCC considers that additional viewpoints from Suffolk may be required, when the location of the converter station is confirmed and ZTVs will be available to inform the required viewpoint locations.
- 7.13 It would have been a good approach to test the visual influence of alternative converter station sites on the National Landscapes through ZTVs as part of the site selection process.
- 7.14 SCC welcomes that the final list of viewpoints will be agreed with stakeholders and considers itself to be one of them (note: there was no response to SCCs comments to the Non-Statutory consultation in Table 21-1 Non-Statutory Consultation Responses - Landscape and Visual Amenity).
- 7.15 SCC would welcome to be also consulted on the rationale for visualisation types. SCC considers it likely that photo montages or wirelines will be required for viewpoints from the sensitive locations within the National Landscapes.
- 7.16 Nighttime effects should also be demonstrated through photomontages.

Significance threshold

- 7.17 SCC considers that the significance threshold needs to be lowered and include all moderate effects, with professional judgements discerning whether moderate-minor effects are significant or not. Especially as the thresholds for sensitivity are quite high as well.
- 7.18 This is supported by GLVIA3 clarification note 3(5), which states that 'typically, effects falling below the middle of the range of overall effect are assessed as not significant'. With the matrix proposed this would be below medium sensitivity and medium impact.
- 7.19 SCC also considers that truly negligible effects would be negligible regardless of the sensitivity of the receptor.
- 7.20 I have offered these comments without prejudice to any comments I or any other SCC Officer may wish to make at a later date, when additional information becomes available.