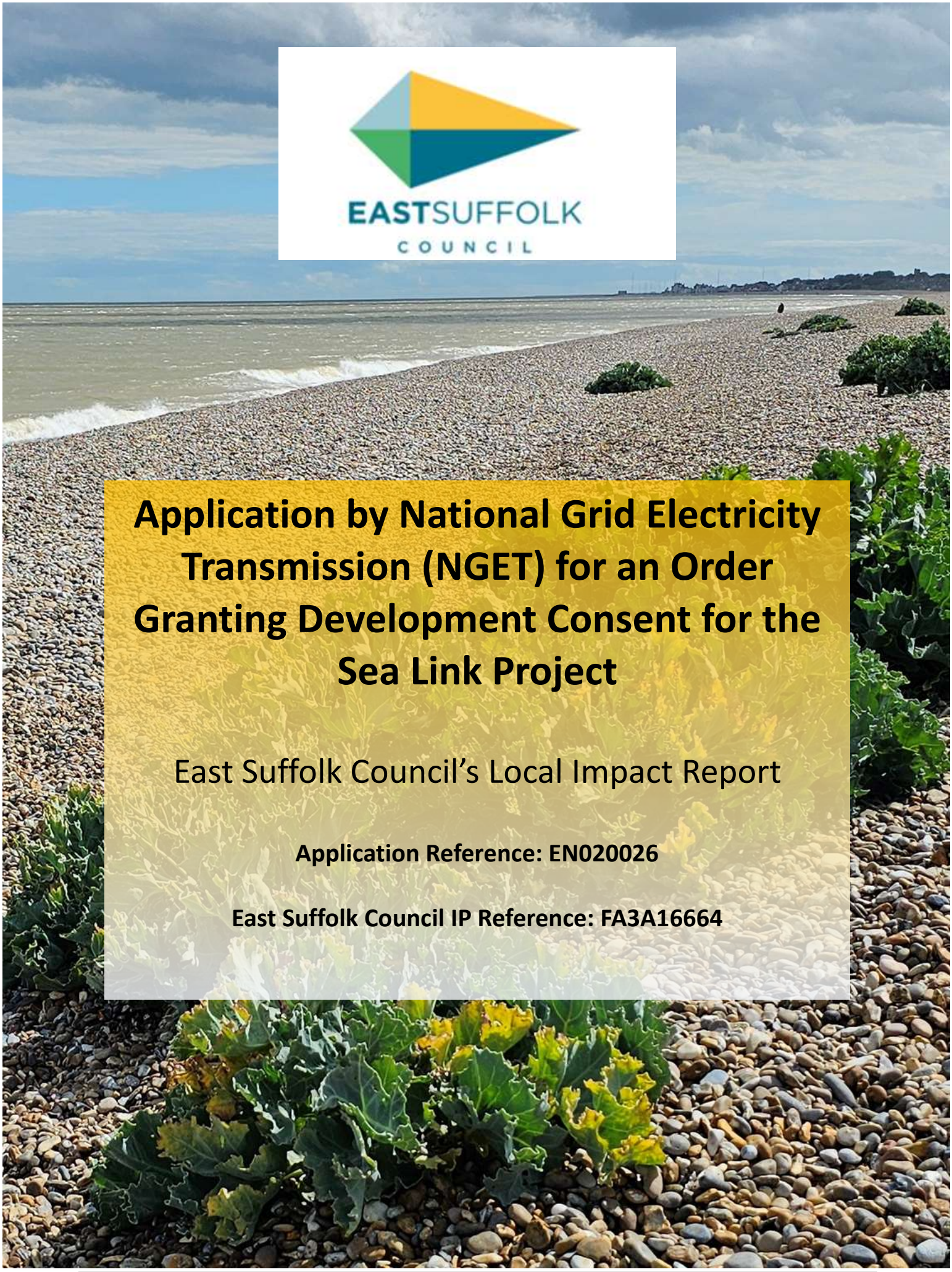

Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the Sea Link Project

East Suffolk Council's Local Impact Report

Application Reference: EN020026

East Suffolk Council IP Reference: FA3A16664

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Application Reference:	EN020026
ESC Reference:	251118 - ESC Local Impact Report – Sea Link – final submission
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[redacted]

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1. Introduction

1.1 This Local Impact Report (LIR) has been prepared in accordance with Section 60(3) of the Planning Act 2008 (as amended), having regard to the guidance set out in the Planning Inspectorate's *'Nationally Significant Infrastructure Projects: Advice pages'* relating to Local Impact Reports and the Development Consent Order (DCO) Examination process.

1.2 Section 60(3) of the Planning Act 2008 defines a Local Impact Report as: *'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area).'*

1.3 This LIR provides details of the likely impacts on the East Suffolk district resulting from the Sea Link project under topic-based headings reflecting the likely nature of the impacts. The key issues for East Suffolk Council (ESC) and the local communities it represents are set out using topic headings, being split initially by site-specific elements of the project, and then by more generic project-wide impacts including application document commentary by ESC technical officers.

1.4 This LIR builds upon the topics previously raised within ESC's Relevant Representation [RR-1420]. ESC will continue to engage with the Applicant through the Statement of Common Ground (SoCG) process, with a view to narrowing any residual issues in dispute or areas of disagreement over the course of the Examination period. ESC wishes to reiterate, as previously raised in its Relevant Representation, that it was not provided with sufficient time to comment on the draft SoCG prior to its submission with the application. Version A of the draft SoCG [APP-329], therefore, reflects only the Applicant's understanding of ESC's position, and not ESC's true position. It is hoped that the Applicant will provide sufficient time for ESC to comment on the next version of the SoCG – although as at the date of this LIR, ESC has not been provided with an amended draft.

1.5 Whilst ESC recognises, assuming need can be demonstrated, the benefit Sea Link will deliver by helping to reinforce the National Grid, thereby facilitating the UK Government meeting its renewable energy targets, it is ESC's view that such benefit should not and cannot be secured at the expense of East Suffolk's local communities. The proposed project (if consented) must avoid the introduction of significant and long-lasting damage to the local built and natural environment, local communities, and the tourist economy. The local impacts of the project and its cumulative impacts must be genuinely identified and considered and properly addressed by the Applicant. The areas where ESC has significant concerns and where the issues remain unresolved have been outlined below, and these matters will be further expanded upon in future representations submitted separately.

2. ESC's Pre-application Engagement with the Applicant

2.0.1 ESC has engaged with the Applicant by responding to the project's pre-application Scoping Report (October – November 2022), the non-statutory consultation (October – December 2022), the statutory consultation and Preliminary Environmental Information Report (PEIR) (October – December 2023), the additional consultation (July – August 2024), and the local engagement and project update (November 2024 – January 2025). Copies of all engagement activities during the pre-

application stages for the Sea Link project are available on the East Suffolk Council website, should these be required by the Examining Authority (ExA) for context[1].

2.1 Statutory Consultation

2.1.1 As alluded to in ESC's recent response to the Adequacy of Consultation (held 28th March – 11th April 2025) [AoC-006], ESC remains disappointed by the lack of genuine engagement undertaken to date by the Applicant. What were intended to be helpful and meaningful contributions by ESC provided throughout the pre-application stage do not appear to have been positively taken on board, and in some respects have been ignored.

2.1.2 ESC is of the view that its involvement to date has been largely dismissed. This undervalues the positive contributions made by all those involved on behalf of the communities ESC serves, and is in direct conflict with the underlying ethos of the Nationally Significant Infrastructure Project (NSIP) pre-application process.

2.1.3 The ExA should be aware that ESC raised concerns with the Applicant in relation to the depth and quality of engagement on a number of occasions throughout the project during the pre-application stage. Although the higher-level project overview meetings on Sea Link were scheduled regularly, detailed engagement on a technical level was extremely limited. Ahead of the statutory consultation, ESC would have expected technical officers to be regularly engaged in all the thematic areas, but this was not the case. Whilst a limited number of meetings were held with technical officers, these were insufficient in number and depth and ESC has not been given the opportunity to feed into the assessments and preliminary environmental information. In relation to some vitally important topic areas, including coastal processes, ecology, surface water drainage and flood risk, and air quality, there has been virtually no engagement. Of equal importance, it was emphasised that engagement with the local communities is also essential and should be a key feature of the pre-application phase – which unfortunately was also not the case.

2.2 Additional Consultation and Engagement

2.2.1 As part of the Additional Consultation held in the latter stages of the pre-application phase, ESC highlighted to the Applicant that there were several recurring themes of questions from the public, including requests for more information about the proposed River Fromus crossing at the converter station site. There were also requests for design visualisations, including illustrations to better understand the massing of the bridge in the landscape. Participants also noted concern at NGET's assessment of the bridge creating significant adverse effects on the setting of Grade II Listed Hurts Hall, and its setting in the landscape, together with the potential loss of ancient woodland and veteran trees.

2.2.2 In addition, considerable concern was expressed about the unacceptable core working hours and consequent impacts on residents' mental health and wellbeing, with several members of the public noting the presence of multiple construction projects happening in one geographical area at the same time. Questions were asked about the timing of the traffic and transport surveys taking place, noting the highly seasonal tourist economy and resultant peaks in the summer months. Concerns about fly parking and the provision of worker parking, and the potential for park and ride/car sharing schemes were also raised. Questions were raised about community benefit and compensation to the local communities affected by the construction of the project, including impacts on holiday rentals and tourist accommodation. These topics are discussed in more detail below. East Suffolk's communities have had to engage with multiple NSIPs over several years and have entirely reasonable expectations as to consultation and engagement by project promoters.

[1] https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/sea-link/

2.2.3 ESC wrote to the Applicant at the Additional Engagement stage to urge NGET to engage constructively with East Suffolk Council on its continuing significant concerns about the Sea Link project, particularly in light of the project's timescale of formal submission to the Planning Inspectorate. ESC has continuously attempted to engage, notwithstanding its objections to the proposal, to achieve the best outcomes for its communities and environment should the project be consented and delivered. ESC has provided extensive responses to all consultations held on the project over the years of pre-application engagement. All of its responses are published on its website[2] and are not repeated here.

2.2.4 ESC warned the Applicant as it approached submission bearing in mind the government's emerging position on requiring better coordination with other Nationally Significant Infrastructure Project promotors, that in light of the Applicant's failure to engage with both ESC and the local community, ESC would have no choice but to maintain and express its negative concerns throughout the DCO Examination process which is not ESC's preferred method of responding to major infrastructure projects within the District. The completely unnecessary and entirely avoidable work now involved as a consequence of NGET's attitude simply diverts ESC's attention from the core obligations and duties that it owes to the local community.

2.2.5 ESC highlighted that 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, reducing the number, and complexity of, substantive issues that remain unresolved going into examination and decision-making. It is clear that more could have been done by NGET during the pre-application stage but NGET seem simply to be relying on the fact that the identification of Sea Link as an Accelerated Strategic Transmission Investment (ASTI) project means that the project will be consented and can be delivered at any cost.

2.2.6 As an example of the lack of genuine engagement offered by NGET, the limited supporting information provided at the Additional Engagement stage meant that ESC's comments were themselves inevitably limited as a result. This was particularly relevant for the Fromus crossing, where ESC had not seen visualisations of further design drawings and had to request photomontages to show the potential visual impact of the Fromus crossing in the landscape, both with and without landscape mitigation planting. This was particularly important in relation to western viewpoints to and from Hurts Hall. ESC asked for further detail and information in its response to the additional targeted consultation in summer 2024, noting that there was significant concern from members of the public about the potential impact and design of the Fromus crossing. ESC also raised the importance of a strong masterplan led design approach to the converter station site.

2.2.7 The Applicant had not provided the required detail regarding these topics at that time. In addition, in light of the announcement from Ofgem that National Grid Ventures' Nautilus project would be returning to a connection at the Isle of Grain in Kent, had also not addressed what this meant for the master planning approach.

2.2.8 The Additional Engagement introduced an expansion of the Order Limits around the converter station site for drainage flexibility, though these areas of change are limited in nature and scope. ESC has continually reiterated the importance of appropriately sized Order Limits to secure both a strong masterplan led design approach and allow appropriate flexibility for the required mitigation, specifically for appropriate landscape planting.

2.2.9 ESC understands from the ExA's Section 89(3) letter [PD-006] and correspondence with the Applicant ahead of examination stating that the ExA has requested that the Applicant review the drainage mitigation proposals in light of the concerns raised by ESC and Suffolk County Council, seeking

[2] https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/sea-link/

clarification as to whether there is sufficient land for drainage mitigation. ESC will continue to monitor the position over the course of the examination, seeking robust reassurances whilst working in collaboration with Suffolk County Council (SCC) as Lead Local Flood Authority (LLFA). This is discussed further in Section 6.5.6 of this LIR.

2.3 ESC Town and Parish Council Engagement

2.3.1 In light of the topics discussed above, following acceptance of the application for examination, ESC met with the Towns and Parishes due to be impacted by this project. A meeting was held at the ESC offices on 7th May 2025 to provide host Town and Parish Councils an opportunity to air their engagement and resourcing concerns, followed by a more focussed session held on 22nd May 2025 to discuss the project's merits and enable ESC officers to listen and incorporate local concerns into its Relevant Representation [RR-1420].

3. ESC's Overarching Position on Sea Link

3.0.1 ESC's position on the Sea Link project at the 2023 Statutory Consultation was one of objection. This position has been maintained since that time throughout the pre-application and pre-examination process. In light of the lack of engagement by the Applicant as outlined above, ESC has no choice but to continue to object to the Sea Link project in view of the detrimental impacts that will be forced upon the local communities who will be compelled to host and neighbour the project's onshore infrastructure.

3.0.2 It is clear that the Sea Link project will result in yet further unacceptable harm to the communities, environment and economy of East Suffolk over and above the other numerous infrastructure projects that have already been forced upon the local community and, as discussed later in this LIR, it is not yet considered that the need for the project is robustly proven.

3.0.3 To compound East Suffolk's concerns, ESC remains disappointed at the lack of any meaningful engagement by NGET with other energy scheme promoters locally with a view to identifying the sharing of opportunities to reduce cumulative impacts. It is considered that the project does not currently incorporate any genuine level of coordination with other projects as discussed in more detail below. Opportunities for coordination with other subsea cable projects proposing to make landfall in the region over the next decade have been missed, resulting in different landfall locations and cable routes being selected by separate projects leading to a greater amount of onshore infrastructure and impacts being imposed on East Suffolk's local community and environment. This demonstrates a lack of oversight and vision from Government, and there has been no holistic action taken in the planned delivery of future energy infrastructure needs in this region. Instead, our local communities are receiving a sporadic succession of different projects coming forwards, working primarily in isolation to one another, leading to extended construction impacts over numerous years. It is precisely for this reason that the national policy statements require proper exploration of co-ordination, without which construction impacts are unacceptably extended on local residents over very significant periods.

3.0.4 The main parts of the Sea Link project which could be coordinated with other proposed projects are at the co-located converter station site at Saxmundham, and there is potential for the HVAC link into the proposed Friston substation to include an element of spatial overlap with Lion Link which is understood to also include a connection from the existing electricity grid via the proposed substation in the Friston area, if consented. It is understood that NGET (Sea Link) and NGV (LionLink) are legally separate organisations, yet both fall under a common holding company with the same shareholding. In light of this, a greater degree of genuine coordination is expected. Co-location does not, however, automatically mean coordination and ESC are mindful that the financial and regulatory constraints facing the Sea Link project, being closely regulated by Ofgem, may set a precedent for other future

projects whose timelines are following that of Sea Link. Indeed, colocation without coordination – as proposed here – guarantees extended construction impacts on local residents. Where realistic opportunities for inter-project coordination exist, ESC remains mindful that decisions taken at this initial project stage for Sea Link may restrict what can be achieved in terms of meaningful coordination in the future, if not sufficiently planned as part of the Sea Link project now. This has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located aspects of the projects.

3.0.5 As noted, ESC stressed on numerous occasions the importance of NGET carrying out genuine engagement and expressed concerns that there was limited time to consider responses properly and adapt/amend proposals accordingly. Whilst some of the details published by NGET in their project update consultation were provided partly in response to concerns raised by ESC and other stakeholders, the majority of comments and concerns raised by ESC were not addressed and therefore form the basis of the matters discussed in this LIR. This is disappointing as it means topics and concerns previously raised with the Applicant will need to be examined by the ExA, adding unnecessary workload and cost to all interested parties engaged in the examination process. These concerns have been set out in ESC's response to non-statutory consultation in 2022, statutory consultation in 2023, and additional targeted consultation in 2024, and are repeated in this response.

3.0.6 ESC supports the Net Zero transition, but it has not to date been given the confidence that the delivery of the project as currently proposed would not result in unacceptable harm to the local environment and the existing communities. In addition, it is still not persuaded that there is a need for the project at this time – and considers the proposed delivery of the project, if consented, to be premature. Should the project be consented, however, ESC will work with the Applicant in the interests of its local communities and environments, to secure the best outcomes possible. ESC will expect the Applicant to provide genuine levels of mitigation and compensation to offset the impacts introduced by the Sea Link project - and will expect those elements to be formally recognised by the inclusion in the Order of Requirements and/or protective provisions – as may be appropriate.

3.1 Issues outstanding and ESC requirements

3.1.1 To assist the ExA in understanding ESC's concerns in the generality, set out below is a summary, very much by bullet point, of those matters that are still outstanding, are unanswered or will be required from the Applicant during the course of the examination. Whilst these issues have been referenced in this LIR, it should nevertheless be emphasised that it is very much a summary and may be amended/enlarged depending on the progress made with the Applicant as will be noted in the draft SoCG, the latest version of which has not yet been passed to the Council. These issues are, however, currently as follows:

Landfall

- Restrictions on HGV movements on the A1094 and B1122 via Construction Traffic Management Plan (CTMP) controls. (LIR Section 6.1.3)
- A scaled, cross-sectional diagram of the Horizontal Directional Drilling (HDD) profile from the offshore cable joint to the onshore transition joint bay (TJB), or a mechanism in the DCO for approval of cable depths at a later date. (LIR Section 6.1.4.2-6.1.4.4)
- Detail of the proposed mitigation, monitoring and reporting measures if cables become at risk of being exposed. (LIR Section 6.1.4.5)
- Bespoke bathymetric and topographic surveys and subsequent reporting periodically to monitor the depth of cable burial and rates of geomorphological change. (LIR Section 6.1.4.10)

- A landfall-specific assessment of the geomorphology and coastal processes at the end of the project's lifetime. Infrastructure in the coastal environment should be left in place with a contingency plan if this is more beneficial than removal. (LIR 6.1.4.11)
- The Outline Offshore Construction Environmental Management Plan must secure ESC and other relevant stakeholders being given sight of the post-installation survey reports for the HVDC link. (LIR Section 6.1.4.12)
- Additional mitigation measures for technical HDD issues (e.g. frac out) in the Outline Construction Environmental Management Plan (OCEMP) Register of Environmental Actions and Commitments (REAC). (LIR Section 6.1.7.3-6.1.7.8)

Saxmundham Converter Station and River Fromus Crossing

- An operational noise rating level at least 5dB below the typical background, or the lowest level that can reasonably achieved if this is not possible, to form the basis of an operational noise limit DCO requirement. A firm commitment to reducing the rating level further at detailed design stage should be made. (LIR Section 6.3.7)
- Additional landscape planting areas at key viewpoints including VP1, VPs along the B1119, and VP6, including multi-species tree belts along the B1119 and Fristonmoor Lane. An adaptive landscape maintenance programme must be implemented. (LIR Section 6.3.8.6, Section 6.3.8.9)
- A DCO Requirement to secure early planting around the converter station site prior to commencement. (LIR Section 6.3.8.8)
- Clarification regarding whether plantation woodland west of the River Fromus will be felled as part of the project and the impacts of this on Biodiversity Net Gain (BNG) calculations. (LIR Section 6.3.9.1)
- An appropriate consenting mechanism in the DCO to secure the River Fromus bridge design. (LIR Section 6.3.11.5)

Friston Substation

- Use of HDD for the HVAC cable corridor entering the proposed Friston substation site under a Scenario 1 connection. (LIR Section 6.4.3.2)
- The Order Limits and DCO must reflect the drainage arrangements and other mitigation secured under the SPR DCOs for the Friston substation site (or an acceptable alternative solution). (LIR Section 6.5.5.4)

Project-wide: Landscape and Arboriculture

- Re-submission of all tree survey information and amendments to Arboricultural Method Statements according to the new guidance once the new BS 5837 Trees in Relation to Design, Demolition and Construction is published. (LIR Section 6.2.2.2)
- Replacement planting to cover plant failures must be subject to the five-year aftercare period. (LIR Section 7.1.3)
- Removal of the exception to reinstatement for land above or within 10 metres of underground cables stated in Requirement 9 (Reinstatement schemes). (LIR Section 7.1.3)

Project-wide: Cultural Heritage

- Reconsideration of the Cultural Heritage assessment in light of the points raised in Sections 6.3.6 and 6.5.4 of this LIR.

- Findings of the trial trenching and other ground investigation works related to the Neolithic henge must be available for scrutiny prior to the end of the Examination to allow the appropriate provisions and protections to be secured in a DCO Requirement. (LIR Section 7.3.2.7)

Project-wide: Ecology

- Commitments in the OCEMP REAC and/or Outline Landscape and Ecological Management Plan (OLEMP) (as applicable) to:
    - Further pre-construction hazel dormouse surveys and additional mitigation measures to address potential habitat fragmentation impacts. (LIR Section 7.2.2.6-7.2.2.7)
    - Approval of detailed fencing plans to ensure impacts on red deer movements are considered. (LIR Section 7.2.3)
    - Final plans that include mitigation measures for hedgehog as part of vegetation clearance. (LIR Section 7.2.4)
    - Trapping and translocation of reptiles as part of the mitigation package. (LIR Section 7.2.6.1)
    - Pre-construction ornithological surveys. (LIR Section 7.2.1)
    - Ensuring bird mitigation measures cover all areas of potentially suitable nesting habitat and do not conflict with mitigation measures for other species. (LIR Section 7.2.1)
- Justification for how construction mitigation measures described in the OCEMP REAC and OLEMP to address fragmentation of commuting habitats are achievable at all points where hedgerows are breached. Justification where no alternative avoidance or mitigation measures (e.g. use of trenchless techniques) are deemed available must also be provided. (LIR Section 7.2.5.5)
- Clarity regarding how the viability of proposed mitigation measures in the OCEMP will be determined where an 'if practicable' caveat is included, and what will happen if it is decided that a particular measure is not practicable. (LIR Section 7.2.9.1)
- Clarity regarding why construction mitigation measures are split between the OCEMP and OLEMP. (LIR Section 7.2.9.2)
- Further bat surveys must be undertaken before construction commences (i) due to insufficient bat survey effort, and (ii) if existing survey data is out of date before construction commences. (LIR Section 7.2.5.9)
- Further detail of how BNG will be legally secured, delivered, managed and monitored. (LIR Section 7.2.7)

Project-wide: Noise and Vibration

- Robust evidence and specific detail of the non-specific mitigation relied upon to resolve significant impacts. (LIR Section 7.4.1.5)
- Reduction of the Lowest Observable Adverse Effect Level so it is based on the baseline noise environment of the area. (LIR Section 7.4.4.2)
- Use of Control of Pollution Act Section 61 notifications to demonstrate Best Practicable Means throughout construction. (LIR Section 7.4.7.1 and Appendix A)
- Further detail of the 'temporal restrictions' proposed as part of the mitigation scheme. (LIR Section 7.4.8.3 and Appendix A)

Project-wide: Air Quality

- Idling or stationary engines must be switched off where this will reduce emissions. (LIR Section 7.4.12.2)
- Consideration of projected weather forecasts so extra mitigation can be planned in particularly dry or windy weather. (LIR Section 7.4.12.2)
- Agreement with the local authorities of monitoring and reporting of commitments with regards to vehicle and non-road mobile machinery, e.g. via the monitoring and reporting requirements listed within the Outline CTMP. (LIR Section 7.4.12.3)
- Updates to the Air Quality Management Plan (AQMP) throughout the lifetime of the project as required. Production of separate AQMPs for each stage of the onshore works should be considered. (LIR Section 7.4.12.4)

Project-wide: Light

- A clear and robust complaints procedure for light nuisance concerns. (LIR Section 7.4.13)

Project-wide: Public Rights of Way

- Where diversions or temporary closures of Public Rights of Way are required, options should be explored with SCC and ESC in the first instance. (LIR Section 7.6.2)

Project-wide: Socio-Economics, Leisure and Tourism

- An updated assessment of baseline conditions immediately prior to commencement of construction. The scope and frequency of monitoring and reporting of socioeconomic conditions during construction should be agreed. (LIR Section 7.8.3.7, Section 7.8.6.8)
- Avoidance of core tourism periods and coordination with local events calendars. (LIR Section 7.8.5.6)
- A holistic approach to the socio-economics, leisure and tourism assessment using mixed methodologies (surveys, interviews, additional tourism data, etc.). (LIR Section 7.8.7.9)
- Support for initiatives that support economic growth locally, including:
    - An Employment and Skills Plan to support outreach to schools, apprenticeships and local employment; and
    - A Supply Chain Plan to help local businesses identify opportunities for gaining contracts within the supply chain. (LIR Section 7.8.9.7)

Project-wide: Working Hours

- Removal of Saturday afternoons, Sundays and Bank Holidays from the core working hours in DCO Requirement 7. (Throughout LIR, including Sections 7.4.2 and 7.5.1, and Appendix A)
- The list of exceptions to working hours in the DCO should be narrowed. (LIR Section 7.4.2)
- A mechanism for requesting working outside of permitted hours (with adequate justification) should the reduced core working hours be agreed would be supported by ESC. (LIR Section 7.4.2)

Community Benefits

- Engagement with ESC and the local community regarding how the project's residual impacts can be effectively compensated. (LIR Section 7.7)

4. Sea Link Project Need Case

4.0.1 The latest updates of the Energy National Policy Statements (NPSs) were published in early November 2023, coming into force in January 2024. As the time of submission of this LIR, further updates to the Energy NPSs lie before Parliament and are projected to come into effect in December 2025. As Sea Link was accepted for examination prior to these updated NPSs coming into effect, the application will be judged according to the January 2024 versions of the NPSs, and so all quotations provided in this LIR are from the January 2024 versions.

4.0.2 ESC notes that EN-1 identifies that 'there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives' (paragraph 3.3.65). In addition to this it is noted that the 'volume of onshore reinforcement works needed to meet decarbonisation targets is substantial', specifically noting the need for 'substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England)' (paragraph 3.3.68). Distribution Network Operators are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economic proposals in terms of network design. National policy is clear that 'in considering the 'economic and efficient' approach the network project needs to follow good design, avoidance and mitigation principles…as referenced in EN-5' (paragraph 3.3.78).

4.0.3 Paragraph 3.3.80 of EN-1 goes on to state 'related to the above and considering the potential for unwarranted and avoidable disruption, inefficiency, and visual impacts along the onshore - offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits.'

4.0.4 Therefore, whilst EN-1 recognises the need for new electricity networks in order to meet the future energy demands, the importance of good design and need for coordination to reduce the adverse impacts on the local communities and environment is acknowledged. The revised NPS EN-5 supports need for coordination stating that 'The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible' (paragraph 2.13.11).

4.0.5 The Applicant states the need case for Sea Link is based on the need to reinforce the existing network transmission infrastructure between Suffolk and Kent. The submitted Environmental Statement Non-Technical Summary [AS-016] states in Section 1.5 that 'the existing transmission network in and between East Anglia and the south-east of England needs reinforcing for four main reasons:

- the network was not designed to transport electricity from where it is increasingly being generated (largely offshore);
- the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport;
- as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses; and
- upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the increasing need for electricity whilst operating to required standards.'

4.0.6 It also states that Sea Link 'is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future.'

4.07 The project is said to be required to transfer energy between Suffolk and Kent and to provide a transmission connection to the east of London. Having reviewed the Applicant's submission

materials, in particular the need case argument presented within Section 3 of document [APP-320] 'Document 7.2 Strategic Options Back Check Report', ESC understands the broader picture requiring reinforcement of the existing transmission network infrastructure within East Anglia and the South East of England. This is due to increased demand, transporting electricity from energy generation sources to where it is needed, in line with UK Government policy in the lead up to the connection of 50GW of offshore wind by 2030 and facilitating Net Zero by 2050. ESC is not questioning that aspect of the overarching need. ESC is, however, extremely concerned as to the timing of the delivery of Sea Link and its relationship with the timing of other NSIPs being delivered within our district, in light of the anticipated onshore impacts collectively introduced.

4.0.8 As highlighted in Table 3.2 – 'Planned Generation for East Anglia' of [APP-320], Sizewell C's first reactor is due for completion in 2035, with the second following in 2036. Additionally, NGV's LionLink interconnector project is noted within Table 3.2 as being due for completion by 2024 – clearly this is incorrect. In fact, with s42 consultation for LionLink anticipated in January 2026, NGV are now communicating (on NGV's LionLink project website, under the 'Our proposals' tab) that the project (if consented) would not be due for completion until approximately 2032 (i.e. it is 12-18 months behind Sea Link). Table 3.2 within [APP-320] highlights that not all of the generation identified within the 'Sizewell Generation Group' will be generating or consented in this region by the time Sea Link is operational (if consented). Sizewell C remains circa 10 years away, LionLink is yet to be consented, and Nautilus no longer has a need to connect in East Suffolk, with NGV rescinding their connection offer in March 2025. Nautilus is now connecting at the Isle of Grain, Kent.

4.0.9 The need case summary presented within Section 1.5 of the Applicant's submission document 6.1 'Environmental Statement Non-Technical Summary' [AS-016] states that reinforcement is required in part due to 'the growth in offshore wind, interconnectors and nuclear power'. However, as discussed above, Sizewell C is approximately 10 years away from generating power, and the only interconnector now proposed within East Suffolk is LionLink (noting that the Nautilus project has been relocated to a connection on the Isle of Grain in Kent). LionLink would be 6-7 years away from completion if consented.

4.0.10 Additionally, should the identified projects not become operational at the times anticipated or not be delivered at all, then it follows that this fundamentally changes the need for Sea Link. Importantly, project prematurity restricts opportunities for meaningful coordination with other projects looking to connect at Friston, such as LionLink, which only accentuates local concerns regarding cumulative impacts. ESC notes that NGET acknowledge this point in Section 5.13.4 of [AS-016], stating under the 'Assessment of Inter-project Cumulative Effects' that *'The Proposed Project is also predicted to have significant cumulative effects with the LionLink Offshore Interconnector …. from the construction of the Suffolk Onshore Scheme and South Saxmundham Garden Neighbourhood. These effects are also anticipated during decommissioning.'*

4.0.11 The Overarching National Policy Statement (NPS) for Energy Infrastructure EN-1[3] states in section 3.3.65 that *'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives'*, and 3.3.66 goes on to add that *'……The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts'*. Section 4.1.3 states that *'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused'*. In this context, it is the view of ESC that the Sea Link project is being fast-tracked due to political pressure, restricting

[3] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1/overarching-national-policy-statement-for-energy-en-1#the-need-for-new-nationally-significant-energy-infrastructure-projects

meaningful opportunities for coordination with other projects. Sea Link is being delivered at pace due to the overarching 'top-down' need case narrative, but its lack of coordination with other projects will only result in more community and environmental impacts, in an area already experiencing material impacts, not less as desired by EN-1. Given the completion timeframes of Sizewell C and LionLink, Sea Link, the project is considered to be premature and as a result has missed opportunities for real coordination with future projects. This is discussed further below. A 12-18 month delay would have meant that Sea Link and LionLink could have underwent a joint examination enabling meaningful consideration of the cumulative impacts which would have assisted with the assessment and delivery of coordinated elements between the projects. The timing and need case presented for this project must therefore be balanced against the significant disruption and local impacts the project is set to introduce on the local communities of East Suffolk in conjunction with the already approved large scale of new infrastructure development being introduced across the district.

4.1 ESC Local Development Plan and Policy

4.1.1 The Suffolk Coastal Local Plan was adopted by Full Council on 23 September 2020. The Waveney Local Plan was adopted on 20 March 2019 and forms part of the Development Plan for the East Suffolk district relating to the former Waveney local planning authority area.

4.1.2 The relevant Local Plans for the East Suffolk district therefore comprises:

- East Suffolk Council – Suffolk Coastal Local Plan 2020;
- East Suffolk Council – Waveney Local Plan 2019.

4.1.3 The following Neighbourhood Plans are also applicable to this project:

- Saxmundham Neighbourhood Plan (made 26 July 2023).

4.1.4 Note – In June 2025, Saxmundham Town Council published the 'Draft Modified Saxmundham Neighbourhood Plan 2022-2036' which represents the pre-submission consultation draft document containing various amendments to the previously adopted neighbourhood plan. Of relevance are the modifications in Chapter 13 'Mitigating the impacts of National Infrastructure and Energy Projects on Saxmundham'. This focusses on NSIPs and it is noted that the Sea Link Converter Station is located within the parish boundary, with Chapter 13 outlining the need to mitigate the impacts of such projects. ESC notes that a new amended parish boundary was approved on 30th April 2024 in order to include the South Saxmundham Garden Neighbourhood allocated in the Local Plan. This has meant that a longer stretch of the A12, which is frequently used by construction vehicles for NSIPs, now falls within the parish boundary.

4.1.5 Within Chapter 13, Objective EN1 has been added *'To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.'* Policy SAXEN1 'Addressing and mitigating the impacts of large-scale energy projects' has also been introduced which requires NSIP promoters to provide *'appropriate mitigation measures and/or significant local community benefits, to proportionately address negative impacts…'.* The policy goes on to provide further narrative on proposed impacts and associated mitigation and/or compensation.

4.1.6 The relevant policies of the Development Plan will be referred to within this LIR where appropriate. However, the proposed Sea Link project proposes to make landfall between Aldeburgh and Thorpeness, linking up to a proposed converter station site on land east of Saxmundham, before linking into the consented Friston substation. It is therefore understood that none of the proposed Suffolk onshore infrastructure will be located within the Waveney Local Plan policy area.

4.1.7 Suffolk County Council (SCC) adopted the Suffolk Minerals and Waste Local Plan on 9 July 2020. The SCC Development Plan now comprises:

- Suffolk Minerals and Waste Local Plan 2020.

4.1.8 ESC notes that the submitted Environmental Statement Non-Technical Summary [AS-016] states in Section 5.5.7 that *'the Study Area is partly located within a Mineral Consultation Area identified within the Suffolk County Council Minerals and Waste Local Plan. However, no minerals infrastructure has been identified within the Study Area'*.

4.1.9 In summary, the statutory Development Plan relevant to the proposed development comprises of:

- East Suffolk Council's Suffolk Coastal Local Plan 2020[4];
- Suffolk Minerals and Waste Local Plan 2020[5]; and
- Saxmundham Neighbourhood Plan (made 26 July 2023)[6].

4.2 The Principle of the Development

4.2.1 Within the Suffolk Coastal Local Plan 2020, Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects sets out the matters which the local authority will take into consideration including the nature, scale, extent, and potential impact of proposals, in addition to the cumulative impacts. The policy seeks to ensure that major energy projects deliver significant local benefits and provide an ongoing legacy for the local community.

4.2.2 Policy SCLP9.1: Low Carbon & Renewable Energy recognises the need to transition to a low carbon future and supports low carbon and renewable energy developments where they are within a suitable area or satisfy specific criteria which includes consideration of the existing environment and avoiding significant adverse impacts. This policy focuses on onshore wind turbines at the time of its drafting, but it is of some relevance.

4.2.3 ESC initiated a review of the adopted Local Plan in September 2025 as it has reached five years since its initial adoption.

5. Coordination and co-location

5.1 Government's aspiration for greater coordination

5.1.1 ESC has been engaging with the Government regarding the unstructured and non-collaborative approach to energy development which the revised NPSs seek to address[7]. In summary, ESC's request was three-fold:

- a full cost benefit analysis of the options for connecting all the currently proposed and consented offshore wind, multi-purpose interconnectors, and reinforcement projects to users in the UK, with prioritisation being given to offshore solutions connecting the power directly to areas where the demand is needed and the utilisation of brownfield sites;
- assistance to ensure that the consenting process related to the NSIPs proposed within East Suffolk is coordinated; and
- a commitment to mandatory community benefits for communities directly impacted by

[4] https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf

[5] https://www.suffolk.gov.uk/asset-library/imported/chapters-1-to-18-smwlp-adopted-july-2020.pdf

[6] https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Saxmundham/Made-Plan/Saxmundham-NP-Adopted-July-2023.pdf

[7] https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/strategic-engagement/

hosting energy infrastructure.

5.1.2 ESC's formal approach is to be supportive of well-developed, well-designed and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised NPSs. This, however, has not been the case to date. Instead, ESC has had to face and deal with numerous infrastructure projects in recent years, all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the District. This cannot continue to occur at the expense of Suffolk's environment and communities. The succession of individual proposals (including SPR's EA1, EA3, EA2 and EA1N, Sizewell C, and potentially now Sea Link and LionLink) impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging, unsustainable, and unacceptable situation.

5.1.3 ESC acknowledges that renewable energy and enhanced transmission infrastructure (both offshore and onshore) will play a central role in tackling climate change and in meeting Government targets in the lead up to Net Zero by 2050. The move towards the delivery of low carbon and renewable sources of energy will only be achieved if developments such as the Sea Link project are only permitted having first taken into account the very real impacts they will have on the landscape, natural environment and local communities set to host or neighbour such development whilst also taking into account all cumulative and in-combination effects both current and proposed created by other projects. Developers must recognise and include far greater levels of coordination between projects in relation to the overarching objectives set out in the Offshore Transmission Network Review (OTNR).

5.1.4 The OTNR was announced in 2020 following recognition by Government that the current uncoordinated approach to offshore transmission lacked any strategic vision and was causing significant environmental and local impacts from the associated onshore infrastructure. This is a matter which ESC has been highlighting and calling for action on from the Government since 2018.

5.1.5 The OTNR process concluded in May 2023 and the organisations involved, along with the Department for Energy Security and Net Zero (DESNZ), have been implementing the findings to deliver a coordinated offshore transmission regime for Great Britain. A summary of the outputs from the review was published by the government in July 2023[8]. In brief, these included the Holistic Network Design – delivered by the Energy Systems Operator in July 2022; recommendations for a future framework to support the delivery of net zero through offshore wind generation, summer 2023; ground-breaking work on new technologies such as multi-purpose interconnection; significant changes to existing codes, standards and processes to put transmission delivery on the front foot while also protecting communities, environment and consumer costs; Accelerated Strategic Transmission Investment (ASTI) decisions through Ofgem; delivering retrospective coordination among well advanced projects; enabling regulatory change to standardise coordination for transmission infrastructure; and launching a consultation on community benefits for network infrastructure.

5.1.6 ESC notes that the Sea Link project engaged with the OTNR, as did the developers of the LionLink and Nautilus interconnector projects (National Grid Ventures), and the Five Estuaries and North Falls offshore wind farm projects, and said they were committed to exploring options within the Early Opportunities workstream[9]. In a joint statement published in July 2022, the three project promoters

[8] https://www.gov.uk/government/publications/offshore-transmission-network-review/offshore-transmission-network-review-summary-of-outputs

[9] https://www.gov.uk/government/publications/offshore-transmission-network-review-pathfinder-projects/joint-statement-from-north-falls-five-estuaries-and-national-grid-commitment-to-exploring-coordinated-network-designs-in-east-anglia

stated that *'whilst we welcome the progress the OTNR has made and recent publications from BEIS and the energy regulator, Ofgem, on enabling regulatory and policy changes, currently, the detailed commercial, regulatory and legislative frameworks needed to realise offshore coordination are not yet fully in place. We are working with the Government and Ofgem as they continue to progress the changes needed to enable greater coordination between these projects. So as not to impact the Government's 2030 offshore wind ambition, we continue to progress, in parallel, consent for grid infrastructure projects based on the existing regime'*. ESC believes that every opportunity should be taken to seek maximum coordination between the projects where this helps to minimise impacts on local communities and the environment. This has not happened to date.

5.1.7 ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link and LionLink projects at all stages of the development consent process[10]. It is imperative, given the pressures this area of East Suffolk is facing, that the cumulative and in-combination effects with other proposed and consented projects are considered and opportunities for coordination are identified and maximised. This is necessary and essential to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.

5.1.8 ESC notes that the Sea Link project was part of a consortium headed up by the North Falls offshore wind farm project, together with the Five Estuaries offshore wind farm project, which was awarded funding by DESNZ through the Offshore Coordination Support Scheme (OCSS) in December 2023. The purpose of the funding from the OCSS was to enable the exploration of coordination between the two offshore wind farms and Sea Link. However, in September 2024, the Secretary of State decided not to grant further funding to the consortium, with the OCSS no longer being funded by the Government. ESC understands that the consortium supports this decision, which highlighted the significant extra costs and the negative impact on the delivery timeline of connecting more renewables to the UK energy system, especially considering the government's commitment to quadruple offshore wind and fully decarbonise the UK's electricity system by 2030. The consortium will not be pursuing a coordinated offshore connection as a result.

5.2 National Policy Statements

5.2.1 The National Policy Statements for Energy Infrastructure clearly communicate the importance of a coordinated approach to the delivery of energy infrastructure for reducing environmental impacts and delivering value-for-money for consumers.

5.2.2 Section 3.3.71 of the Overarching National Policy Statement for Energy (EN-1) NPS EN-1 states that - *'For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered'* than the historical approach to connecting offshore wind which resulted in individual radial connections developed project-by-project. Whilst ESC acknowledges that this section of NPS EN-1 is primarily concerned with offshore wind farm connections, it also makes reference to offshore transmission projects (of which Sea Link is one). ESC considers that this section is particularly applicable to the Suffolk Onshore component of the Sea Link project, given the significant number of other energy NSIPs in East Suffolk currently being consulted on, being constructed, or operational.

[10] https://www.eastsuffolk.gov.uk/assets/Planning/Energy-Projects/Sea-Link/13-SCC-and-ESC-Coordination-of-Interconnectors-letter-to-National-Grid.pdf

5.2.3 Section 3.3.75 of NPS EN-1 states *'The final Phase 1 report for National Grid ESO's Offshore Coordination Project (published December 2020) found that a more integrated approach to offshore transmission, which included efficient planning of the onshore network, could deliver consumer benefits of up to £6 billion by 2050, depending on how quickly it could be implemented. It also found that the number of new electricity infrastructure assets, including cables and onshore landing points could be reduced by up to 50 per cent over the same period, significantly reducing environmental impacts and impacts on coastal communities.'* The finding that a more integrated approach to offshore transmission and the efficient planning of the onshore network *'could deliver consumer benefits of up to £6 billion by 2050, depending on how quickly it could be implemented'* is relevant to ESC's earlier point on Sea Link being fast-tracked, resulting in a lack of meaningful coordination and the introduction of greater onshore impacts for local communities and the environment.

5.2.3 Section 3.3.80 of NPS EN-1 states that, *'…considering the potential for unwarranted and avoidable disruption, inefficiency, and visual impacts along the onshore - offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits.'*

5.2.4 ESC acknowledges that Section 3.3.81 states that *'the importance of accelerating coordination does not…[mitigate] against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'* However, this section should not be relied upon to justify a failure to coordinate. Notwithstanding the fact that ESC remains unconvinced by the Applicant's Need Case, primarily in relation to project timing and a lack of coordination, as discussed in Section 4 of this LIR, ESC considers that a more coordinated approach to the development of the Sea Link project would not preclude the project from *'[reinforcing] the transmission system in the South East of England and East Anglia'* [APP-002]. Therefore, ESC considers that the need for coordination should be held in the highest regard, and any failure to coordinate should be robustly justified, demonstrating how any coordination would prevent the project achieving its stated purpose.

5.2.5 In addition to EN-1, the National Policy Statement for Electricity Networks Infrastructure (EN-5) states within Section 2.15.1 that *'coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community, and other impacts…must be considered'* and that *'the Secretary of State should also be satisfied that options for coordination have been considered and evaluated appropriately.'*

5.2.6 More specifically, Section 2.13.14 of EN-5 states that *'co-ordinated transmission proposals, including multi-purpose interconnectors and other types of offshore transmission…, are expected to reduce the overall environmental and community impacts associated with bringing offshore transmission onshore compared to an uncoordinated, radial approach. These reduced impacts could, for example, relate to: fewer landing sites and reduced landfall impacts; reduced overall cable length and impacts; and fewer cable corridors and reduced impacts from these.'* Section 2.13.16 adds that *'for onshore infrastructure, reduced impacts could, for example, relate to fewer or co-located substations and converter stations and transmission lines as well as demonstrating how environmental and community impacts have been avoided as far as possible.'* Section 2.13.18 states that *'applicants should seek to demonstrate the reduced overall impacts from co-ordination…and how the onshore connection locations have been identified. These projects are expected to demonstrate the reductions in environmental and community impact achieved through co-ordination compared with radial solutions.'*

5.2.7 NPS EN-5 also highlights the need for a more strategic approach to network planning. Section 2.8.1 states that such an approach will *'ensure that network development keeps pace with renewable generation and anticipates future system needs. Strategic network planning, such as through the Holistic Network Design and its follow up exercises or through forthcoming Centralised Strategic Network plans, helps reduce the overall impact of infrastructure by identifying opportunities for coordination, where appropriate, and taking a holistic view of both the onshore and offshore network.'*

5.2.8 It is therefore clear that NPS EN-1 and EN-5 encourage project promoters to build coordination into their projects at both the strategic and detailed design stages of development, particularly in areas such as East Suffolk that are facing a significant number of concurrent projects, giving rise to cumulative impacts being introduced on local communities. Yet with Sea Link (and LionLink), the results are disappointing. The Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) seek to address the need for more coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. Coordination must therefore be fully explored, with robust justification demonstrated should this not be pursued across the proposed projects.

5.2.9 The above points are important and relevant for the purposes of section 104 of the Planning Act 2008 for *'Decisions in cases where national policy statement has effect'*, such as for Sea Link.

5.3 Concerns over lack of co-ordination

5.3.1 ESC is being consulted on and is aware of a number of energy-related projects that may have an impact on our District, and ESC welcomes and supports collaborative working between all applicants to ensure that the optimal solution is delivered. ESC expects this to involve coordination and the sharing of infrastructure where feasible to reduce the amount required onshore.

5.3.2 The lack of coordination evident between Sea Link and LionLink, both due to connect in the same locality if consented, is a significant concern. ESC considers that the maximum coordination should be inherent within the design and ambitious solutions delivered as the revised NPSs state. Coordination is considered to be more than just co-location; it is essential that there is a genuine reduction in the disruption and environmental impacts as a result which, at this stage, neither projects seem to recognise. Coordination should be essential during all phases of the developments, not just at the siting and routeing stage, although the co-location and sharing of infrastructure/corridors at the siting and routeing stage is important. The various NSIPs are currently being proposed on the basis of multiple different timescales. In order to deliver a genuinely coordinated approach, NGET should have sought to align the Sea Link project's timeframe for examination with that of NGV's LionLink project, allowing a shared or conjoined examination with the appointment of the same examining panel to consider the projects. The fact that NGET have sought to distance themselves from NGV in terms of co-ordination when both are owned by the same company bearing in mind the damage that both projects will cause to the area is insulting. Genuine co-ordination would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the design and cumulative impacts of the projects.

5.3.3 In order to reduce the degree of disruption experienced by local communities and the adverse impacts on the environment, the delivery of Sea Link should be coordinated with other projects being delivered in the locality. As stated above, coordination should reduce the adverse impacts of the project so that, in the event the projects all receive consent, the situation should be avoided where each project is being delivered one after the other, with the combined construction effects being elongated and experienced over many years.

6. Site-specific Commentary – Sea Link Project Infrastructure proposed within East Suffolk

6.0.0.1 This section provides commentary based on specific aspects of the proposed onshore infrastructure within the East Suffolk District. This should be read alongside the matters raised in the Project-wide Commentary section later in this LIR.

6.1 Landfall

6.1.1 Context

6.1.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-018] of the submitted Environmental Statement states in Section 4.2.1 that the Suffolk Onshore Scheme includes *'A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).'*

6.1.2 Tourism

6.1.2.1 The landfall selected is located between the seaside towns of Aldeburgh and Thorpeness, approximately 700m inland form Thorpe Road which runs adjacent to the well-known sand and shingle beach. The site is within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Royal Society for the Protection of Birds (RSPB) North Warren Reserve, and close to the Sandlings Special Protection Area. Section 85 of the Countryside and Rights of Way (CRoW) Act 2000 introduced a strengthened duty 'to further the purpose' of National Landscape designations[11], meaning to actively work towards and promote its core function, conserving and enhancing the natural beauty of the area.

6.1.2.2 The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. It follows that the disruption created in the area during the construction phase of the proposed Sea Link project would adversely impact both the local community and the tourist economy. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance. Further details in relation to ESC concerns regarding the impact on the tourist economy from this project in combination with other NSIPs has been provided in the project wide section later in this LIR.

6.1.2.3 It is a serious concern that landfall for the proposed Sea Link and LionLink projects have not been co-located to reduce the combined environmental impacts of construction on the Suffolk Coast.

6.1.2.4 The proposed landfall site for Sea Link lies along Thorpe Road, an important recreational route for vehicles and pedestrians, connecting the popular visitor destinations of Aldeburgh and Thorpeness, and permitting access to car parks, the beach and The Scallop, an important visitor attraction.

6.1.2.5 Potential closure of the road to enable construction works will affect residents, visitors, and businesses who may have to be diverted along the B1122 and B1353 to reach their destination. The B1122 will also be affected and is bisected by the Order Limits for underground cabling works and siting of a construction compound.

6.1.2.6 ESC needs to be reassured that disruption, especially footpath diversions and road closures, will be planned to minimise the impact on residents, visitors and businesses. Road closures and associated works should fall outside periods of peak visitor activity, and any road closures and diversions should be published well in advance with sufficient signage erected to ensure that road users can navigate the diversions. ESC will require formal advance notification.

[11] https://national-landscapes.org.uk/news/furthering-the-purpose-explained-planning-that-supports-nature-climate-and-communities

6.1.3 Landfall Access

6.1.3.1 ESC defers all highway and traffic matters to SCC Highways Authority. It does, however, wish to highlight that access to the landfall area is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular tourist seaside destinations. At the time of the DCO examinations for the SPR East Anglia ONE North and TWO projects, proposals included HGV and vehicle access to the order limits passing south of Aldringham by using the A1094 and B1122. At that time the difficulties of large vehicles using the roundabout at the entrance to Aldeburgh was a consideration for the developer. Given that the Sea Link project proposes a landfall directly adjacent to the B1122, ESC recommends that NGET revisit the constraints pertaining to the proposed use of narrow roads, as highlighted in the SPR examinations, and limit HGV movements as far as practicable, putting the lessons learned from the SPR projects into practice for Sea Link. We would expect such controls to be contained within the Outline Construction Traffic Management Plan (OCTMP). ESC also wishes to highlight to the ExA that since the time of the SPR project examination, SPR amended the proposed installation methods to be used for the onshore cables when crossing the B1122 south of Aldringham. Planning Application DC/25/2037/FUL replaced the need for open cut trenching by the use of horizontal directional drilling under the Hundred River and the road. This also resulted in the accesses originally proposed on the B1122 no longer being required, removing HGV traffic from the B1122. This was a positive enhancement over the DCO consent as it reduced HGV movements in this area.

6.1.4 Coastal Management

6.1.4.1 Sea Link's proposed cable landfall route passes under a dynamic shoreline with a Management Plan (SMP) policy of Managed Realignment[12]. The long-term intention here is to maintain the naturally-functioning coastal defence provided by the shingle barrier, rather than rely on man-made defences.

6.1.4.2 The proposed depth of cable burial beneath the nearshore, foreshore and hinterland has not yet been stated by the applicant – only an 'illustrative diagram' of the HDD profile beneath the foreshore and hinterland has been made available (Drawing Reference DCO/T/DE/SS/1212 of [APP-037]) and the detail is unsatisfactory at present. ESC requires a scaled, cross-sectional diagram of the HDD profile from the offshore cable joint to the onshore TJB, in order to scrutinise the proposal from a Coastal Management perspective and determine whether the depth of burial will be satisfactory in a worst-case future climate change scenario, over the project's lifetime. Contemporary topographic and bathymetric survey data should be used to confirm current beach and seabed levels (in metres ODN) respectively. If the Applicant cannot provide the depths of cable installation yet, ESC requires a mechanism in the DCO for later consultation and approval of the levels proposed by the applicant.

6.1.4.3 ESC must ensure that the cable will be buried sufficiently over the lifetime of the project because of the obvious danger to public health and safety as well as the negative impact that trying to re-bury and protect the cable would have on coastal geomorphology, namely the shingle beach barrier and the coastal protection that feature provides.

6.1.4.4 ESC considers a depth of between 25m and 30m under present foreshore levels to be adequate for the long-term avoidance of cable exposure. The applicant must provide a detailed design of the landfall infrastructure with sufficient cable depth beneath the current and future foreshore levels.

6.1.4.5 ESC requires details of the mitigation measures Sea Link propose to put in place should there be a risk of the cable being exposed. This would include the environmental trigger levels used to implement this mitigation, and the process of identifying and reporting these from the proposed monitoring scheme (outlined in Section 1.10 (Offshore Environmental Control Measures) – Post-

[12] https://environment.data.gov.uk/shoreline-planning/documents/SMP7%2FSMP%20May%202012%20Executive%20Summary.pdf

Installation Survey and Reporting of the Outline Offshore Construction Environmental Management Plan [APP-339]).

6.1.4.6 It is not uncommon for ESC to deal with exposed cables on the foreshore after storm events, such as the one shown photographed in Figure 1 below, exposed at Pakefield after Storm Amy. Coastal erosion has accelerated and now occurs at an unprecedented rate in many places on the Suffolk Coast. This is why ESC advises that a conservative approach should be adopted to the calculation of cable burial depth beneath current and future foreshore levels.

Figure 1: Photos of cables exposed at Pakefield from Storm Amy inspection by ESC Coastal Management Team (14-10-2025).

6.1.4.7 An indicative location of the TJB is illustrated on Indicative General Arrangement Plans – Suffolk [APP-038], but there is scant information available on the actual Suffolk Landfall infrastructure to be left in-situ. ESC requires more detail on the TJB i.e. footprint, dimensions and security measures of any infrastructure on the surface, post-construction.

6.1.4.8 ESC welcomes DCO Condition 10(1) – *'Landfall installation must only use trenchless landfall techniques'* [AS-087], as this minimises impact on coastal geomorphology and coastal processes throughout construction and operation. ESC request to be consulted on the Method Statement and Monitoring Plans for (Suffolk) cable landfall.

6.1.4.9 ESC welcomes the embedded mitigation measures listed in Paragraph 1.8.3 Part 4 Marine Chapter 1 Physical Environment of the ES [AS-113] and agrees that it is imperative to minimise disturbance of the Coralline Crag as it is considered integral to local geomorphological stability. With regards to the additional mitigation measures listed in Paragraph 1.10.1, ESC requests detail on the frequency and extent of these *'MPE05-Depth of Burial Monitoring surveys to be undertaken post installation'*, and the details of what will trigger implementation of mitigation.

6.1.4.10 Coastal Monitoring: ESC would expect bespoke surveys and subsequent reporting to be undertaken, annually for the first three years after construction, and then at 5 yearly intervals until decommissioning. ESC supports the use of DEFRA/Anglian Coastal Monitoring Programme (ACMP) monitoring data to bolster the monitoring reports but asserts that Sea Link must not rely on the ACMP data alone for post-construction or mitigation monitoring at the landfall site as there is no guarantee that this programme will receive future funding. ESC would expect the applicant to proactively organise bespoke bathymetric and topographic surveys that monitor the depth of cable burial and rates of geomorphological change, from baseline surveys.

6.1.4.11 ESC acknowledges Requirement 13 of the DCO pertaining to decommissioning and highlights the need for a landfall-specific assessment of the geomorphology and coastal processes at the end of the project's lifetime. If removing the infrastructure from the coastal environment is deemed, by ESC, more detrimental than beneficial to remove, then it should be left in place with a contingency plan.

6.1.4.12 ESC has reviewed the Outline Offshore Construction Environmental Management Plan (CEMP) [APP-339] and expects that ESC and other relevant stakeholders are given sight of post-installation survey reports. This should be secured in the Outline Offshore CEMP.

6.1.5 Flood Risk

6.1.5.1 ESC defers matters relating to flooding and surface water drainage to the EA and SCC LLFA, however, wishes to highlight that the low lying Hundred River valley has the potential for surface water and tidal inundation and lies within Flood Zone 3.

6.1.6 Cumulative Impacts

6.1.6.1 Given the sensitivities of the landfall site, the ExA should satisfy themselves that sufficient detail is provided by the Applicant in relation to the impacts of the works at the landfall, in addition to the provision of required mitigation so to deliver a significant reduction in the adverse impacts socially, environmentally, and economically.

6.1.7 Ecology

6.1.7.1 ESC notes that Section 4.2.52 within Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version B) [AS-093] of the submitted Environmental Statement states that *'the Suffolk landfall is located north of the settlement of Aldeburgh and south of the settlement of Thorpeness. The marine HVDC cables would cross under Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), North Warren Royal Society for the Protection of Birds (RSPB) Reserve and Thorpe Road'*, with Section 4.2.54 adding that *'there is a commitment to make landfall using a trenchless crossing technique beneath designated sites'.* The Applicant suggests that direct impacts on the designated sites will be largely avoided (in reference to the Leiston-Aldeburgh SSSI, which is also part of RSPB North Warren Reserve), resulting in a Negligible Adverse, Not Significant effect on the SSSI being concluded in the ES [PDA-017].

6.1.7.2 Section 4.6 of Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] sets out the Applicant's proposed construction methods, stating in Section 4.6.131 that *'Trenchless crossings require a significant mobilisation of infrastructure at either end of the crossing, requiring a construction compound to be built at either end. The drilling methods are often slower than trenching which can impact on programme and they can be more expensive than open cut solutions. Some techniques require drilling fluid to be used at high pressures that can lead to frack out, where drilling fluid escapes to the surface during the drilling process. Mitigating the risk of settlement and frack out often requires trenchless crossings to be installed at greater depths than open cut installations which can impact on the thermal properties of the installation and reduce the capacity of the system. This can lead to trenchless solutions being unfeasible from a capacity perspective. Due to the need for separation between drills the overall construction corridor and permanent installation is likely to be wider than an alternative open cut installation.'*

6.1.7.3 Whilst the use of a trenchless technique (such as HDD) is preferable to an open cut technique, it comes with its own potential construction impacts, such as the risk of 'frac out' of the drilling compound/material (e.g., bentonite), the risk of technical failure meaning that excavation within the SSSI is necessary to recover equipment, and the need to access the SSSI to monitor the progress of each drill to ensure that it follows the correct course. Not all of these concerns are satisfactorily addressed in the application documents. For example, the Register of Environmental Actions and

Commitments (REAC) [APP-342] at Table 1.1 ID point B22 lists a potential effect as "*Impacts to ecological receptors from having to retrieve drilling equipment*", the mitigation commitment as "*Measures to avoid the trenchless drilling equipment getting stuck*" and the securing document as "*Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments*". However, the REAC doesn't actually include details of any such measures and refers to itself as the securing document. It therefore appears that there are actually no measures to address this impact proposed to be secured in the plan.

6.1.7.4 ESC has experience of other NSIPs utilising HDD techniques which have suffered 'frac outs'. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address potential impacts which could arise must be fully explored. For example, several bentonite frac outs occurred at Martlesham Creek when using trenchless techniques for ScottishPower Renewables' East Anglia ONE project. The developer monitored the situation closely for impact and the bentonite was allowed to naturally attenuate through tidal action. The Environment Agency (EA) and Natural England were engaged with in these instances, and ESC considers engagement with relevant stakeholders (for the Sea Link landfall site, this may include Natural England, the RSPB, and the Environment Agency) essential in the event of frac outs to manage impacts. The difference between the Martlesham Creek frac out and a potential one at the North Warren landfall is that Martlesham Creek is where the River Fynn enters the River Deben (which is tidal at that point) and therefore natural dispersal of the released bentonite was determined to be a viable option. At North Warren any released bentonite would be into the ditch system which does not have a comparable flow pattern to Martlesham Creek, meaning that natural dispersal is considered to be much more unlikely. It is therefore important that the CEMP REAC is updated as set out in paragraph 6.1.7.3 above to include appropriate mitigation measures to address this concern.

6.1.7.5 Technical assessment included in Appendix A of the Design Development Report [APP-321] appears to indicate that trenchless crossing of the SSSI is feasible and it is understood that the draft DCO (Version D) [AS-087] commits to using a trenchless crossing technique as opposed to an open cut technique (see Condition 10). This is essential. Open cut would be unacceptable.

6.1.7.6 ESC defers detailed technical consideration of this matter to Natural England, the Environment Agency, and the RSPB (as SSSI landowner) and expects the Applicant to collaborate with these stakeholders to ensure that this mitigation is feasible and adequately secured. ESC considers that any acceptability of the proposed landfall is wholly dependent on the use of trenchless technology to pass under the Leiston to Aldeburgh SSSI and North Warren RSPB reserve. To open cut this area of land would put the designations at greater risk of harm. ESC maintains that the selection of this landfall area means that the project has the potential to result in a greater impact on the designated site compared to a landfall option which avoids the SSSI entirely.

6.1.7.7 The ES conclusions on the ecological impacts of the landfall cable installation are only reliable in a scenario where no technical issues with the construction are encountered. Where technical issues which would cause an adverse impact can be reasonably predicted, the project must secure adaptive mitigation measures to cover reasonably predictable failure scenarios and ensure that the SSSI is not impacted by any remedial works that may be necessary. These should include a description of parameters to be used to assess whether material which escapes as the result of a frac out will be actively removed from site or left to naturally disperse; what mitigation measures will need to be put in place to protect ecological features if removal of material is required (particularly in relation to breeding birds, wintering birds, otter and water vole); and what monitoring measures will be put in place to assess ecological impacts as a result of either material removal or leaving material in-situ to naturally disperse. These should be identified in the Outline Construction Environmental Management Plan (OCEMP) REAC and the detail confirmed as part of the discharge of the

Construction Environmental Management Plan (CEMP) for that phase of the work under Requirement 6.

6.1.7.8 In addition to the above, it must also be ensured that construction works do not significantly inhibit the RSPB's ability to appropriately manage the SSSI at North Warren. Should any specific considerations in relation to this be required, they should be secured as part of the CEMP and Landscape and Ecological Management Plan (LEMP).

6.2 HVDC cable (landfall to Saxmundham Converter Station)

6.2.1 Context

6.2.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states in Section 4.2.1 that the Suffolk Onshore Scheme includes *'A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point…where the cable transitions from onshore to offshore technology.'.*

6.2.1.2 At the statutory consultation stage, a Preliminary Environmental Information Report (PEIR) was presented which included the possibility for Sea Link to lay cable ducts for the other known projects looking to co-locate infrastructure with Sea Link at that time. However, in the lead up to the DCO application being submitted to PINS, ESC notes that changes to the coordination strategy resulted in NGET removing the potential for meaningful coordination with the forthcoming NGV LionLink project, reflecting NGV's early dismissal of the proposed Aldeburgh landfall and onward cable route. ESC understands this was a reactionary decision on the part of NGET in response to NGV's choice to focus on the northern landfall options due to offshore constraints. However, ESC remains disappointed that the two projects did not feel obliged to coordinate more than presently proposed in line with NPS policy guidance.

6.2.1.3 The East Suffolk coast is a highly designated area which means that any landfall along the coast will inevitably create negative impacts. The HVDC cable corridor associated with the Aldeburgh landfall is heavily constrained on the eastern end by ecological and landscape designations in addition to other matters as previously highlighted. If this can be navigated by the Applicant, then there is a significant pinch point at the crossing of Leiston Road close to Aldeburgh Golf Club. At this narrow point the construction works would not only be near residential properties but also have the potential to cause significant disruption to one of the main routes into the town from Leiston. Once across Aldeburgh Road the cabling would be to the north of the current golf club layout but through an area of land granted planning consent (DC/22/2697/FUL) to facilitate the expansion of the golf course. As depicted in Version A of the Statutory and Non Statutory Sites of Nature Conservation Geological and Landscape Importance – Suffolk Plans and Drawings [APP-026], the HVDC cable corridor also remains within the designated National Landscape for a large proportion of its length (depicted on Sheets 4 to 6).

6.2.1.4 The HVDC cable route continues to pass close to residential properties as it travels across to the converter station site; it is proposed the cabling will pass through the Friston substation site from the north which involves running near residential properties and tourist businesses, before continuing north-west to the converter station site. The route would involve interaction with the East Anglia ONE North and East Anglia TWO Order Limits and cable corridors which are entering the Friston site from the south. The construction works in combination with the offshore wind projects will need to be carefully considered to avoid compromising the mitigation measures already secured under the consented DCOs.

6.2.1.5 At the additional pre-application consultation stages, ESC welcomed the realignment of the HVDC cable route near Leiston Road, moving construction activity further away from nearby residential

receptors. However, the cable route remains near some residential receptors, and ESC welcomes all efforts to minimise the impacts of construction on these nearby receptors.

6.2.2 Landscape and Arboriculture

6.2.2.1 There are numerous negative aspects in landscape terms associated with the proposed HVDC cable route. It is inevitable that an open cut trench laying method for cable installation and the associated haul road will lead to adverse impacts on the fabric of the landscape i.e. losses of sections of field boundary hedgerow and tree removals, although it is recognised that to varying degrees, these are largely of a temporary nature. This vegetation removal would, however, be occurring in addition to the clearance works that have already taken place in the district as part of other NSIPs, including Sizewell C, so there is a degree of rolling cumulative impacts on the landscape arising from the various major infrastructure projects that are underway in a relatively small area. The significance of effects arising from the required tree and hedge section removals over the length of the cable route has been assessed to be moderate-minor in the immediate post installation period, and reducing to minor–negligible once replacement planting establishes and takes a presence in the landscape.

6.2.2.2 Although existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction, a new edition is due to be published in the very near future, and when it is, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. The timing of the new British Standard is currently unknown, but ESC will expect all tree survey information to be re-submitted according to the new guidance once the new Standard is published and for Arboricultural Method Statements to be amended accordingly.

6.2.2.3 Having regard to the positive aspects in landscape terms, all areas of onshore development have been subject to a full arboricultural survey and impact assessment to give a full understanding of potential impacts on existing trees and hedgerows. Every effort appears to have been made to keep hedgerow and tree losses to a minimum and to those absolutely necessary. Retained trees and hedgerows will be fully protected according to guidance contained in BS5837:2012 Trees in Relation to Design, Demolition and Construction (or succeeding editions). Submitted documentation shows a commitment to the use of micro-siting/micro-engineering for final cable routing to allow retention to existing trees wherever possible and practical. A detailed replanting methodology has been agreed with an adaptive maintenance approach to ensure full and successful establishment. ESC is therefore satisfied that adverse impacts to the fabric of the landscape can be mitigated to a reasonable and acceptable degree by replanting as part of a full landscape restoration programme. Basic land restoration post cable laying will be secured by a suitable soil management strategy. This has proved a successful approach on similar already consented and installed cable route projects.

6.3 Saxmundham Converter Station Site and River Fromus Crossing

6.3.1 Context

6.3.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states in Section 4.2.1 that the Suffolk Onshore Scheme includes *'A 2 GW HVDC converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.'*

6.3.1.2 Saxmundham is a historic market town set in the valley of the River Fromus, a tributary of the River Alde. The proposed converter station site lies to the east of the town and is detached from the setting of the National Landscape. The site is bounded to the north by the Leiston-Saxmundham Road

(B1119) and to the south by a woodland block and occupies an elevated position in the landscape. The land to the north and east of Bloomfield's covert is open arable land. Modern commercial farming practice since the mid-20th Century has stripped the landscape of most key features such as field boundary hedgerows, hedgerow trees and small woodland blocks. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part.

6.3.2 Co-ordination

6.3.2.1 ESC understands that the Saxmundham site was identified, in part, due to its apparent ability to accommodate more than one converter station at a single co-located site, and that NGET has now confirmed the preferred location of the Sea Link converter station within the wider context of that landscape. NGET's statement that they would work with NGV to develop co-ordinated solutions to the development and delivery of the Sea Link and LionLink projects has not however led to tangible co-ordination. The two converter stations are co-located, not co-ordinated. Both projects would need to run HVAC cables from the co-located converter station site to the connection point in Friston, yet no cable route or cable duct co-ordination is currently proposed by Sea Link (discussed in more detail within 6.4 of this LIR). NGET's intentions to co-ordinate with other projects must be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on environmental, residential, and socioeconomic receptors within East Suffolk. Currently, no such benefit has been presented and NGV and NGET appear to be working in silos, catering only for their own project's interests, rather than the interests of the local communities set to host or neighbour their onshore infrastructure. This means that construction impacts will elongate through a succession of similar cable installation works in the same vicinity (should both projects be consented). Such a blinkered approach to co-located development is entirely unacceptable to ESC and the local communities it represents.

6.3.3 Good Design

6.3.3.1 Good design must be an essential component of the project. The importance of design has also been reflected within the revised NPS EN-1 which encourages the seeking of professional advice on design aspects of the scheme. Design input should continue throughout the consenting and post consent phases. Good design can help to lessen the visual impacts of the development, which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape.

6.3.3.2 The Design Principles – Suffolk document [APP-366] sets out the site-specific design principles which will underpin the design of the converter station. The early engagement with the Suffolk Design Review Panel is positive, as is the submission of the Design Approach Document – Suffolk [APP-364]. The Design Approach document shows different approaches to how the site-specific design principles can be addressed, including CGI illustrations.

6.3.3.3 It is a positive to see a commitment to *"seeking opportunities to reduce height and massing whilst forming a strong narrative and hierarchy of form"* in the site-specific design principles [APP-366] (Table 3.1, BF.4) as well as specific principles relating to the massing of different buildings, and a focus on integration between the design of the buildings and the landscape proposals. These aspects of design are vital given the significant effects identified within the ES.

6.3.3.4 Notwithstanding ESC's position, should Sea Link alongside other NSIPs such as the proposed LionLink project be progressed within the East Suffolk District, this should be on the basis of a co-ordinated approach. ESC remains significantly concerned about the cumulative impacts of multiple projects. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative

that the converter station sites are genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and demonstrate the achievement of long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.

6.3.3.5 The provision of an inclusive and collaborative master planning process is an essential component of the delivery of good design. This collaborative process must however extend into the more detailed design phases and include genuine engagement with the local authorities, parish and town councils and local communities. It is important that the site is designed to minimise the adverse impacts through innovation and embedded mitigation and maximise any opportunities for benefits through the delivery of enhancements. Recent NSIPs consented within East Suffolk have also included an independent design review process. ESC notes that the Applicant has identified the environmental considerations, including landscape and visual considerations, which have informed the siting and outline design of the proposed Saxmundham converter station, as set out application Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]. ESC also notes that the Design Approach Document – Suffolk [APP-364] provides details regarding how the design of this structure, in terms of building form and the external materials, has been developed alongside consultation and stakeholder feedback, including engagement with a design review panel.

6.3.4 Flood Risk

6.3.4.1 It is also important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. It is understood from Section 4.8.3 of Part 2 Suffolk Chapter 4 Water Environment (Version A) within the Environmental Statement [APP-051] that *'Saxmundham Converter Station and Friston Substation would be served with drainage systems that embed SuDS for attenuation of runoff to green field runoff rates in line with the requirements of the receiving watercourse authorities (Internal Drainage Board, Environment Agency or Lead Local Flood Authority and provide treatment of runoff (Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk).'* ESC defers to the LLFA and EA on flood matters but supports the embedded measures, and a green field runoff rate is supported.

6.3.4.2 It is also noted that the Order Limits have been broadened to the south of the converter station site to allow flexibility of drainage route. ESC welcomes this in response to concerns ESC raised at the statutory consultation stage about securing appropriate Order Limits to accommodate the necessary drainage proposals.

6.3.5 Public Rights of Way

6.3.5.1 In terms of Public Rights of Way (PRoW), the site is crossed by Footpaths 5 and 6 which would require temporary and permanent diversions to accommodate the proposed development. It is essential that any temporary or permanently diverted routes provide appropriate amenity for its users, being an integral component of the masterplan for the site, with any permanent diversion being established with the long-term future of the site fully considered (i.e. future converter station developments coming forwards) to avoid the need for subsequent diversions.

6.3.6 Heritage

6.3.6.1 References to Wood Farm should be removed from the submitted Application reports as the building was de-listed on 12th March 2025 following substantial fire damage. As there are no designated heritage assets within the Order Limits, the impact of the Saxmundham Converter Station on designated heritage assets will be through impact on their settings. The list of designated heritage

assets included in the detailed assessment is accepted, however the existing baseline in Section 3.7 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] should include the Saxmundham Conservation Area. The setting of the application site can be characterised by a combination of open agricultural land and patches of woodland, with the historic parkland of Hurts Hall to the west, all of which strongly contribute to the setting of the listed buildings and other surrounding heritage assets.

6.3.6.2 A summary of ESC's assessment of the impacts and effects on designated heritage assets is described in the table below and expanded on in the following paragraphs. The Applicant's (NGET's) assessment conclusions detailed in Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] of the ES are shown in brackets in the table. The principal areas of disagreement are in relation to the impacts and effects on Hurts Hall and Hill Farmhouse.

Receptor	Sensitivity	Magnitude of Impact before mitigation	Magnitude of Impact after landscape mitigation	Residual Significance of Effect	Significant Effect?	Summary of Agreement / Disagreement
Saxmundham Conservation Area	High (NGET – High)	Small (NGET – Small)	Negligible (NGET – Negligible)	Minor (NGET – Minor)	No (NGET – No)	Agreed with ES
St John the Baptist (Grade II* listed building)	High (NGET – High)	Small (NGET – Small)	Negligible (NGET – Negligible)	Minor (NGET – Minor)	No (NGET – No)	Agreed with ES
Hurts Hall (Grade II listed building)	Medium (NGET – Medium)	Medium (NGET – Medium)	Medium (NGET – Small)	Moderate (NGET – Minor)	Yes (NGET – No)	ES Assessment relies on Cultural Heritage Viewpoints, however Landscape Viewpoints support a higher magnitude of adverse impact (Particularly Updated Landscape Viewpoint 2 and Additional River Fromus VP B, both of which ESC understands will be submitted into the Examination by the Applicant at Deadline 1).
Hill Farm (Grade II listed building)	Medium (NGET – Medium)	Medium (NGET – No impact)	Medium (NGET – No impact)	Moderate (NGET – No effect)	Yes (NGET – No)	ES Assessment relies on Cultural Heritage VP, however Landscape Viewpoints support a higher magnitude

						of adverse impact (Landscape Viewpoint 5 [APP-209])

6.3.6.3 ESC has concerns regarding the harm that the converter station and the access over the River Fromus will cause to the significance of designated heritage assets which surround the site, due to the impact of the development on their setting. In particular, Grade II listed Hurts Hall and Hill Farmhouse, as well as the Saxmundham Conservation Area and Grade II* Church of St John the Baptist would be impacted through the changes in their settings.

6.3.6.4 ESC notes that the ES combines the assessment of the Saxmundham Conservation Area and that of St John the Baptist's Church. St John the Baptist's Church is a Grade II* listed building, and while it is located in the Conservation Area and views toward the Conservation Area include the tower of the church, the impacts and effects on the church should be assessed separately.

6.3.6.5 ESC notes that Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] of the ES often identifies important views to and from designated heritage assets separately from the assets themselves. Views to and from a heritage asset may contribute to the significance of the heritage asset, as they are a visual expression of the setting of the asset, therefore when assessing the impact of the development on views to and from the asset, the assessment needs to consider how important those views are to the significance of the asset. Then, the significance of the effects of the scheme should be assessed in reference to the designated heritage assets themselves. For example, Section 3.9.104 states *'Recognising that the change is to the experience of a view and not to the heritage value of the conservation area, the impact is assessed to be small'.* Views contribute to the heritage value of the Conservation Area, therefore this sentence is not accurate. It would be more accurate to say *"the change is to the experience of a view towards the Conservation Area, which contributes to its significance, however the Conservation Area would not be physically impacted, and the impact through the change in the view to the asset's significance is assessed to be small".*

6.3.6.6 The assessment of the impact on the Conservation Area and on St John the Baptist concludes that the Saxmundham Converter Station and the permanent access over the River Fromus would be visible on the approach from the south (Paragraph 3.9.104). ESC considers that the Conservation Area and the church would be most impacted by the visual change to the rural approach to Saxmundham caused by the new access over the River Fromus. This would detract from their significance and would constitute a moderate adverse effect. ESC also agrees that the significance of the residual effect following landscape mitigation would be minor adverse, as the landscape mitigation would provide sufficient screening in views to the north (toward the Conservation Area and the church) to reduce the visual impact of the new access.

6.3.6.7 The impact of the development on Hurts Hall would derive from the permanent access over the River Fromus as well as from the converter station. The new permanent access would introduce a new road that crosses its former parkland, a new bridge and new areas of tree and vegetation screening. The setting of Hurts Hall, i.e. the experience of its surroundings, contributes to its significance by providing visual connections between the Hall and its historic parkland from within its grounds and in views toward the Hall from the east/south-east, and by allowing its architectural interest and its prominence in the landscape to be appreciated. Views toward Hurts Hall from the east and south east are expansive, as shown by the large number of relevant Landscape Viewpoints: Landscape Viewpoints 2 and 20, and Additional River Fromus VP A-C, which ESC understands will be submitted into the Examination by the Applicant at Deadline 1. While the entrance of the Hall faces northward, it should be noted that the south and west façades are also principal façades, with prominent forward

projecting bays. This is remarked upon in the listing description of the Hall. Therefore, the west and south aspects of the Hall are of particular importance. Additionally, while the landscape setting around the Hall changed throughout the 20th century, with more or less tree planting around the Hall at different points in time, and the formal gardens and lawn to the west and south of Hurts Hall are 21st Century additions, this does not undermine the historic and current importance of the western and southern aspects of Hurts Hall.

6.3.6.8 Paragraph 3.9.116 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] of the ES acknowledges that the permanent access and the converter station "*would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated parkland, and would be incongruous with the rural setting that contributes to its heritage value.*" ESC wishes to highlight that, with reference to Sections 3.9.113 – 3.9.116, the impact of the development on Hurts Hall has been separately assessed, firstly when viewed from within the grounds of Hurts Hall and secondly when viewed from the B1121, resulting in a minor adverse effect and a moderate adverse effect, respectively. As both of these views describe different aspects of the setting of Hurts Hall, it stands to reason that the overall effect of the development on Hurts Hall is a moderate adverse effect. It is unclear why two separate assessments have been made by the Applicant, which is akin to a landscape and visual approach and not an assessment of the significance of the asset itself which is what is required for a heritage assessment. ESC agrees that the overall impact of the development would have a moderate adverse effect on Hurts Hall.

6.3.6.9 Hill Farmhouse (Grade II) is located to the south of the Converter Station site. Its setting, as an historic farmhouse, is characterised by its connection to the agricultural farmland surrounding it, as well as by the relative isolation of the farmstead, which has not been encroached upon by modern residential development. Its immediate setting is not particularly open, as it is largely surrounded by a small woodland, however this woodland is not very deep, nor is it consistently dense. It is also inaccurate to say that the house is not perceptible from the wider landscape. In reference to Section Application Document 6.4.2.3.8-D 'Representative Viewpoint Visualisations' of Part 2 of the Cultural Heritage Figures for Suffolk [APP-230] this depicts a view toward the farmhouse, rather than from the farmhouse. Within this static viewpoint the proposed converter station is shown to be screened by the existing trees and by the farmhouse itself. However, in Landscape Viewpoint 5 in Part 2 of the Landscape and Visual Figures for Suffolk [APP-209], where Hill Farmhouse is just cut off on the lefthand side of the picture, the proposed converter station would be prominently visible with the farmhouse in the foreground, particularly in winter. This demonstrates that the wider setting of Hill Farmhouse would be affected, even with the mitigation planting at 15 years. It also shows that during winter, the woodland area around Hill Farmhouse is much less dense, and the largest parts of the Converter Station are likely to be visible from within the grounds of the house. ESC considers that Hill Farmhouse is an asset of medium sensitivity, in the terms of the ES Methodology, and that the magnitude of impact on Hill Farmhouse would be medium adverse, even after the landscape mitigation. Therefore, ESC disagrees that there would be no impact on Hill Farmhouse, and instead considers that there would be a moderate adverse effect on Hill Farmhouse.

6.3.6.10 ESC considers that the landscape planting proposals will serve to mitigate the harm identified to the Saxmundham Conservation Area and St John the Baptist, however it is not considered that the landscape planting would reduce the magnitude of the adverse impact on Hurts Hall and on Hill Farmhouse. It is implied that the ES refers to the Cultural Heritage Viewpoints (contained in [APP-229] and [APP-230]) when it assesses the residual effects of the Suffolk Onshore Scheme at year 15 operation, however it is critical to include the Landscape Viewpoints (particularly the updated Landscape Viewpoints 2 and 20, and the Additional River Fromus VP A-C, all of which ESC understands will be submitted into the Examination by the Applicant at Deadline 1), as these show how expansive and wide-reaching the views toward Hurts Hall are from the east and south-east, both from public footpaths and from the B1121. It should also be noted that the landscape looks substantially different

in winter and summer, and that the visualisations for Summer year 15 would be the best-case scenario, which would only be in place part of the year. Visualisations for Winter year 15 have not been provided. Similarly as noted above, Landscape Viewpoint 5 [APP-209], where Hill Farmhouse is just cut off on the lefthand side of the picture, shows that even in winter, the Converter Station would be very prominent presence in the setting of Hill Farmhouse, even in Summer year 15.

6.3.6.11 ESC considers that the magnitude of the impact would remain at a medium level for both Hurts Hall and Hill Farmhouse, as the incongruent scale of the Converter Station would not be mitigated by the proposed landscaping. The visual mitigation of the proposed landscaping around the new permanent access and bridge over the River Fromus would vary in different seasons, and would only soften, not remove, their visual impact in the setting of Hurts Hall. In reference to *Suffolk Coastal Local Plan Policy SCLP11.4: Listed Buildings,* the development is of a scale and character that is incongruent with the setting of the surrounding heritage assets, and therefore does not meet the requirements of the Local Plan Policy.

6.3.6.12 It should also be noted that Table 3.13 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] does not accurately refer to heritage assets as receptors. 'The approach from the south to Saxmundham Conservation Area' is not a heritage asset. This should read 'Saxmundham Conservation Area'. Additionally, 'Views of Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077) from the B1121' is not a heritage asset. This should be 'Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)

6.3.7 Noise

6.3.7.1 As stated in Section 7.4.5 of this LIR, ESC's stance with regards to operational noise is that a rating level of at least 5dB below the typical background should be the target. Any deviation from this level will require robust justification and the aim should still be to achieve the lowest possible sound level. 5dB below background sound level is the standard starting point for ESC for all developments where noise impact is a consideration. However, this is in accordance with the determination of significance of effect in BS4142 where a below background sound level rating level is indicative of a low impact, depending on context. It is ESC's view that projects of this size and nature should be aiming for a low impact in accordance with the principles of NPS EN-1. If a low impact is not achievable then robust justification should be provided for the noise level that is, focussing on why it is the lowest that can reasonably be achieved. If agreed this should form the basis of an operational noise level requirement.

6.3.7.2 ESC has reviewed the operational noise assessment [AS-119] which makes some reasonable assumptions and forms the basis for ongoing discussion. That said, ESC will require appropriate noise rating levels to be proposed at all, or a selection of, representative noise sensitive receptors (NSRs), to form the basis of an operational noise limit requirement in the DCO. This is necessary to allow noise levels from the project to be verified and provide a basis to regulate the converter station in the event that complaints are received in the future. It is accepted that as Saxmundham is a co-located site, and this introduces certain issues in terms of differentiating noise levels from multiple sources, and this will need some discussion going forward. However, this does not remove the need for appropriate operational noise limits to be set. Even with rating levels agreed, ESC will expect a commitment to go lower, if possible, in the final detailed design and that this will also be included in the operational noise requirement.

6.3.7.3 It is understood that BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS4142) in respect of operational noise assessment has been applied. The acoustic character of the area is quiet, rural residential in nature and this application and development has the potential to introduce a persistent commercial and industrial noise into that character. This should hold considerable weight in terms of context for the considerations required by BS4142 when assessing the significance of impact in addition to assessed and modelled noise

levels. Projects of this scale have the responsibility and means to ensure that they achieve the best possible outcome, and this begins with a robust subjective assessment considering all aspects of introduced sound or noise and the character of the area, and not simply relying on calculated levels where there is an inherent uncertainty.

6.3.7.4 The Applicant has previously stated that it is their aim that the development, if consented, will have a rating level below background sound levels which broadly accords with ESC's expectations in this regard subject to those levels being agreed. Due to the low background sound levels in this area, particularly at night, it is extremely important that noise levels from the development are prevented, mitigated or minimised to ensure these background sound levels are not subject to 'noise creep'. This is particularly important given this site's potential as a co-location site for at least one other similar project, making the reduction of individual project impact key to the prevention of cumulative impact. It is not enough to say that future impact is the responsibility of future projects, and it must be taken account of now. The adoption of below background rating levels will effectively aid the prevention of cumulative noise impact by preventing the increase in background sound level that future projects would adopt for their assessment.

6.3.7.5 If a below background rating is not possible then the applicant needs to propose an operational noise rating level that is the lowest they can reasonably achieve with full justification as to why that is the case. This rating level, determined using BS4142 in order to take account of any acoustic character to sound emissions and, importantly, the local context, will also need to be secured via a DCO requirement. In addition, ESC will require a firm commitment to reduce the rating level further at the detailed design stage if it is possible to do so. Operational Noise reduction must be a fundamental design principle, and this should be clearly stated in the relevant DCO documents so that the project is accountable at implementation stage.

6.3.7.6 The applicant also refers to absolute levels in Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109], and this is assumed to mean that a site noise level of 35db may be considered. Whilst it is accepted that BS4142 allows for consideration of absolute levels in certain circumstances, the cumulative potential for this site and the current character of the area means that all efforts should be made to prevent background sound level creep, which the adoption of a 35dB site level would not. An absolute level would also not take account of any acoustic penalties that a rating would, and given the types of plant to be used, tonality, impulsivity and intermittency are all likely to be considerations. If this is to be considered in line with section 11 1) of BS4142, ESC will require a robust assessment to show that adoption of absolute levels is as or more protective than rating levels and would require consideration of acoustic character of those levels in line with section 11 2).

6.3.7.7 Furthermore, the matter of background sound level creep remains an issue at the co-located site and needs to be addressed if any operational noise levels are to be above background. The cumulative impact with the NGV LionLink project needs to be considered along with a third comparable project given the site is scoped for three projects, albeit with the NGV Nautilus project now set to connect at the Isle of Grain in Kent, rather than in East Suffolk. Where a development is consented that introduces an increase to the background sound level from the additional noise it creates from an above background rating level, the background is effectively increased by that amount as a result. Not only that, but a precedent is also set, especially in respect to projects such as this, in terms of what can be consented in respect to noise impact in future. Each project may also comply with the policy requirements of impact significance in terms of Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) but overall, the background is increased by an amount that a single project would never be allowed. It is not only possible but very likely that further co-located projects will base their assessments on the new background and require a similar allowance in noise impact. This becomes cumulative and whereas

a single project increasing the background sound level by a single amount may not be significant a second and in this case potentially third increase of the same amount becomes significant over time in relation to the current very low background sound level. It is therefore ESC's view that the lowest possible increase on background, and preferably a rating level below background, be applied to ensure that noise levels are not sequentially and cumulatively increased significantly whilst being accepted under policy due to the individually less significant increase, in order to protect the residents and acoustic character of the area.

6.3.7.8 Having reviewed the operational noise assessment [AS-119], ESC notes that Table 1.6 identifies noise sensitive receptor R_5764 as the worst-case receptor with a 0 to +6dB on background sound level prediction, but then states this as +4 to +10dB in Table 1.7 and 1.8, with similar discrepancies for noise ranges for all NSRs between Tables 1.6 and 1.8. ESC would like to see the reasons for this. It is likely that these mitigated predicted noise levels will form the basis of rating levels for the project, and ESC will need to be confident that they are the lowest they can reasonably be and that they are achievable. Once Noise rating levels have been agreed, it will be necessary to undertake monitoring to verify those levels when operational and in the event that complaints are received.

6.3.7.9 It is noted that the assessment has indicated that with mitigation the sound levels near the majority of the noise sensitive receptors will be below background, this is welcomed and aligns with ESC asks. Given the need for mitigation, all parties must be confident that mitigation exists that can produce the required levels of attenuation, and it is vital that ESC and NGET works collaboratively to ensure that this is the best level that can be achieved, and no further reasonable improvements can be made.

6.3.8 Landscape and Arboriculture

6.3.8.1 There are various negative aspects in landscape terms associated with the proposed converter station site and the River Fromus crossing site. It is established by the required assessments, and it is stated in Part 2 Suffolk Chapter 1 Landscape and Visual of the ES [APP-048], that, for the Saxmundham converter station site and the Fromus crossing site, there will be significant adverse effects on their respective landscape's character, during construction, operation, and decommissioning.

6.3.8.2 Visual amenity will also be similarly affected with a notable portion of the horizontal view occupied by construction activity around the converter station and River Fromus crossing for 9 of the 23 selected representative viewpoints because of their proximity to construction and decommissioning activity. This would be because of a lack of intervening vegetation which is an issue across these proposed sites.

6.3.8.3 These adverse effects on both landscape character and visual amenity for the same viewpoints would continue in early years of operation again because of a lack of intervening vegetation such is the current nature of the receiving landscapes and the impact of late 20th century farming practices. And indeed, it is acknowledged in the ES that these significant adverse effects will continue through to Year 15 for both landscape character and visual amenity for the same viewpoints. These lingering adverse effects will persist partly because of the nature of the receiving landscape, and also because of the difficulties of establishing new tree planting in the east of Suffolk because of the likely risk of very limited Spring and early Summer rainfall. Adverse effects may continue beyond Year 15 depending on the effectiveness of the establishment of mitigation tree planting.

6.3.8.4 ESC agrees with the conclusions presented in Tables 1.11 and 1.12 of [APP-048] in relation to the converter station site, with the following exceptions:

- VP1: Could be better mitigated (see Paragraph 6.3.8.6 and Figure 2 below);

- VP5: Could have more mitigation planting, but there are limited opportunities given the area of land available. The impact will begin to usefully lessen after Year 15;
- VP20: Could have more mitigation planting but there are limited opportunities given the area of land available. The impact will begin to usefully lessen after Year 15; and
- VP21: Year 15 assessment should be Major/Moderate Adverse unless the mitigation planting establishes very quickly.

6.3.8.5 The ExA should be aware that ESC did not request that the proposed River Fromus bridge should be moved further north to avoid the veteran tree during the pre-application stages of this application. ESC asked that full account should be taken of the status of the veteran tree and that it should be properly protected. ESC is mindful that moving the River Fromus crossing northwards to its current position impacts upon other disciplines (i.e. heritage impacts on Hurts Hall) as discussed in this LIR.

6.3.8.6 In contrast to the negative aspects, there does also appear to be various positive aspects in landscape terms. A comprehensive Outline Landscape and Ecological Management Plan (OLEMP) has been submitted and this is the result of extensive consultation and discussion with the local authorities and other stakeholders. ESC is generally satisfied that, subject to final detailed agreement, this is likely to be the best approach to achieving success in establishing mitigation and new green infrastructure planting. That said, ESC believes that there are additional landscape planting areas that could have been included and which would have achieved enhanced screening at key viewpoints including VP1, VPs along B 1119, and VP6. Particularly important will be the adoption of an adaptive landscape maintenance programme which will ensure that all new planting receives the full required programme of maintenance regardless of how long it takes for the plants to successfully establish. This will also better ensure that planting is carried out successfully from the outset in order to minimise any prolonged maintenance requirement.

Figure 2 (left): ESC's suggested additional tree planting areas.

A) To reinforce the planting between the Converter Station site and Hurts Hall and to add additional screening for views from B1121 in the context of Hurts Hall.

B) Additional screening for VP1 and users of the PROW.

C) A proper tree belt beside the road instead of a hedge and hedgerow trees would be far more effective at screening views for road users.

6.3.8.7 The Converter Station site has been cleared of almost all former woodland and hedgerows and field boundaries since the 1960s, and the proposed early planting and new screening will see the return of woodland areas, and other trees and hedgerows to the locality. Long term river valley woodland planting will not only help screen the Fromus crossing bridge and approach route but will also provide a lasting long-term benefit to the character of the river valley landscape which may be regarded as a preferable alternative to the current relatively short-term rotation cropping of cricket bat willow plantations. New planting will be a necessary addition to the local green infrastructure network, enhancing wildlife connectivity.

6.3.8.8 If the project is consented, ESC will expect NGET to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a Requirement within the DCO. Early planting is not uncommon for other projects in this area, ESC would like to highlight the pre-construction planting agreed under the SPR consents around the Friston substation as an example of this. In addition, and in reference to the Friston substation (discussed later in this LIR), ESC will not support a scenario whereby the mitigation planting delivered under one project's consent (i.e. SPR's proposed Friston substation mitigation planting) is subsequently harmed and its function diminished by another project following it (i.e. Sea Link's HVAC cable route crossing SPR's proposed substation mitigation planting).

6.3.8.9 ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter [CR1-004] and detailed in the Change Application Consultation Document [CR1-003]. ESC understands that under Change 5, the Applicant is proposing to widen the strip of land south of the B1119 (north of the converter station site) to

provide additional space to plant the proposed new hedge and subsequently maintain the hedge and ditch. As noted in its response to the consultation on the proposed changes, ESC had hoped that this change would help to address concerns it has previously raised regarding the lack of space along the B1119 to accommodate the necessary mitigation planting for screening views of the converter station from the north/northeast. However, the changes do not go far enough and instead would only achieve better hedgerow and ditch maintenance access. ESC considers that wholesale revisions to the B1119 and Fristonmoor Lane planting such that it goes beyond hedgerows and becomes multi-species tree belts should be brought forward by the Applicant to achieve more effective screening. Such tree belts need to be at least 15m, if not 20m, wide to be fully effective. It should also be noted that this part of the project is located at a relatively high elevation in the District and the new development will be both very visible and intrusive. This location demands comprehensive landscaping which it is suggested should comprise intensive tree cover. Indeed, this proposed change could have provided the Applicant with the opportunity now properly to address this important issue of making provision for suitable, comprehensive mitigation planting for successful screening at this location, but it falls short. The area should be increased to accommodate further landscape mitigation when the change request is made.

6.3.9 Ecology

6.3.9.1 The proposed converter station site lies on arable land to the east of the River Fromus, with an access road from the B1121 crossing the river being required as part of the project. The access road route will go through an area of plantation woodland on the western side of the river. Section 2.7.75 'Future Baseline' within Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Version B) [PDA-017] states that *'areas of plantation within the Order Limits, such as the plantation woodland to the west of the River Fromus, would be felled in the normal course of maturity, and either replanted or put down to other habitats. The plantation west of the River Fromus would be felled prior to construction of the Suffolk Onshore Scheme'*. It should be clarified whether this will occur or not as it will influence both the assessment of the impacts which will arise from the project (including on protected species such as bats) and also the Biodiversity Net Gain (BNG) calculations which are required.

6.3.9.2 In addition, ESC notes that Section 2.3.8 within [PDA-017] states that '*It was also at that the 17 September 2024 meeting that the Councils requested consideration of the realignment of the proposed bridge over the Fromus further north, in order to preserve a veteran tree. The alignment of the bridge over the River Fromus was amended in response to this feedback*'. This is an inaccurate representation of the discussion which took place at that meeting. As noted above, it was not requested that the proposed crossing should be moved further north. It was requested that the crossing must avoid impacts on veteran trees, however no preference was expressed as to whether a move north (or south) was appropriate. ESC appreciates that a number of different material considerations, including ecological impacts, are relevant when considering the proposed crossing design and location and an ecological preference was not expressed at that time, beyond that the crossing must avoid impacts on veteran trees.

6.3.10 Master-planning

6.3.10.1 ESC has actively supported and engaged with the opportunities offered by NGET on master-planning, but considers significant further work is essential. The Order Limits are a critical element of achieving a strong design led masterplan, and overly constrained Order Limits create limitations. ESC is aware of concerns and comments from other stakeholders about the Order Limits including Benhall and Sternfield Parish Council, specifically concern about the safety of vulnerable road users and the need for the Order Limits to be sized to accommodate the necessary mitigation and safety measures to address these concerns. ESC defers on highways matters to Suffolk County Council as the Local Highway Authority, but reiterates the need for the project to fully mitigate for potential impacts and maximise opportunities for long-term enhancement and to ensure that legacy

opportunities are maximised, including improved connections and linkages for ESC's communities. An important part of this is considering the Order Limits and the flexibility to include potential mitigation.

6.3.11 Access to Converter Station – River Fromus Crossing

6.3.11.1 Access to the proposed Saxmundham co-located converter station site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. ESC notes that during the pre-application stage, multiple access routes into the converter station site were initially identified and assessed, with ESC (alongside Suffolk County Council as Highways Authority) being heavily involved in these discussions. However, the western access was chosen by the Applicant as the preferred site access option, despite this requiring a crossing of the River Fromus. Prior to submission of the DCO application, ESC expressed concerns to NGET that the consultation documents provided at that time offered limited justification or information on why the western access route to the converter station at Saxmundham has been chosen.

6.3.11.2 At Statutory Consultation in late 2023, three access routes were proposed and high-level detail provided to accompany them. ESC responded on the basis of that information, noting limited detail had been provided which limited ESC's ability to respond. ESC understands that the western construction and maintenance access route was deemed favourable by NGET, with the proposed southern and northern access route options being assessed as unsuitable for the construction traffic required due to factors including the introduction of additional engineering challenges associated with the construction of river or railway bridges, the potential for significant works being required to either the B1121 or the River Fromus itself, or the introduction of construction works in the immediate vicinity of residential properties in Saxmundham. NGET considered the alternatives and concluded that these factors increased the risk of delay and may result in a longer construction period, hence the decision to dismiss the northern and southern access routes from early consideration.

6.3.11.3 The proposed Fromus crossing on the confirmed western access route remains a concern for ESC as it will require significant intrusive engineering and design work which presents a substantial challenge to NGET to deliver, along with the associated expense. At the last round of pre-application consultation, being ESC's last formal engagement on the selected access route prior to submission, ESC stressed that robust justification is required for ruling out the alternative accesses, noting the delivery of the Fromus crossing will require significant engineering works, the full detail of which had not been clearly set out. The confirmed western access has the potential to create significant environmental, landscape, and heritage issues, as discussed in the previous sub-sections of Section 6.3 of this LIR.

6.3.11.4 It is understood that the increase in bridge height was proposed in response to concerns raised by the Environment Agency in relation to potential impacts on aquatic invertebrates, and that the relocation of the crossing further north is due to flood risk concerns. Whilst in principle, design changes to improve the function of the crossing for aquatic invertebrates may be welcomed this is dependent on impacts on other receptors.

6.3.11.5 The proposed Fromus crossing will introduce a crossing of significant scale in a sensitive landscape setting in proximity to the Grade II Listed Hurts Hall. ESC welcomes the project's engagement with the Suffolk Design Review Panel and considers its feedback an important element for NGET to consider and incorporate into the final bridge design proposals. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including engagement with key stakeholders.

6.3.11.6 Existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction. Once the new edition

is published, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. ESC notes that the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point has been assessed to have an RPA radius of 40m which acknowledges the recommendation for uncapped RPA radii for Veteran trees.

6.3.11.7 The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity. During the pre-application stage, the scale of the bridge over the River Fromus was increased in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. The increased construction activity and associated vegetation removal as a result has the potential to have a higher magnitude of effect on the Fromus Valley Landscape Character Area. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is a special quality and a feature of the Landscape Character Area.

6.3.11.8 In terms of heritage considerations, the new permanent access and bridge over the River Fromus as currently proposed would be an incongruous feature in the setting of Hurts Hall and on the approach to the Saxmundham Conservation Area. The open panoramic views of Hurts Hall enhance its prominence against the backdrop of its parkland and contribute to the rural approach to the Conservation Area. The mitigation planting would help to screen the new bridge within certain views, however it would not completely mitigate the introduction of this new infrastructure in the landscape. Further detail of ESC's position is detailed in Section 6.3.6 of this LIR

6.3.11.9 The adopted Saxmundham Neighbourhood Plan repeatedly emphasises the importance of Hurts Hall in views, with Paragraph 11.28 of the Neighbourhood Plan explaining the importance of Hurts Hall as a landmark, stating the *'transition between rural landscape character and the urban form of the edge of the town is important not only for its landscape value appearance but because of the visual gateway it provides to the appearance of the edge of the town. Land to the south of the town and east of the B1121 with views to Hurts Hall and the town beyond was identified as sensitive by the Suffolk Coastal Settlement Sensitivity Assessment, which was undertaken to support the [Suffolk Coastal] Local Plan.'.*

6.3.11.10 Within the made Saxmundham Neighbourhood Development Plan, *'Policy SAX12: Gateways, Views, and the Landscape Setting of Saxmundham'* seeks to protect the scenic value of the landscape and countryside in the parish outside the defined settlement boundary of the town from development which may adversely affect this character. It goes on to say development which would have an unacceptable adverse impact on the landscape or character of the view concerned will not be supported, including in views from the B1121 looking across to Hurts Hall. These are important considerations when evaluating the potential heritage impacts introduced by this project on Hurts Hall.

6.3.11.11 In terms of the design of the bridge, the Design Approach Document – Suffolk [APP-364] is encouraging. At pre-application stage it was advised that the bridge should not attempt a pastiche of a historic bridge type, as that would infer a connection between Hurts Hall and the bridge. Instead, a well-designed contemporary bridge should be proposed, which aims to reduce its visual prominence through its design. It is a positive to see the progression of the design approaches, and the options shown in the document are considered to anticipate the post-consent requirements. Of the options for the railings, the one with slender uprights perpendicular to the bridge structure is preferred, as it represents a higher quality design that is both distinctive and more likely to blend in with the proposed planting, subject to colour. ESC also wishes to highlight that the final height

of the bridge affects not only the visual impact of the bridge itself, but also of the abutment walls and the ramps.

6.3.11.12 The western access also presents a number of concerns more generally regarding the access route to be taken by construction traffic. Specifically, regarding the use of Abnormal Indivisible Loads (AILs), the transportation of heavy plant for the purposes of grading the site and 'cut and fill' activities, and also the delivery of large cable drums (if these are not delivered to site via a haul road). Vehicles using the A12 would need to cross various culverts which have a maximum weight limit which requires detailed assessment. Additionally, the crossing of the rail line using the SCC owned asset Benhall Bridge presents another weight limit constraint, with this being understood to have a maximum bearing strength of circa 46 tons, significantly less than a 400kV transformer. ESC defers these matters to SCC as Highways Authority; however, ESC supports SCC's concerns. At the time of submission, the DCO application did not include the A12 junction, culverts and rail bridge at Benhall within the Suffolk Onshore Order Limits. However, ESC acknowledges that the Applicant is proposing changes to the Order Limits to include land around Benhall Railway Bridge to allow the Applicant *'to consider a wider range of possible ways of strengthening the bridge'*. As stated in its response to the consultation on the proposed changes, ESC welcomes the Applicant attempting to resolve a long-standing and obvious problem, but considers it disappointing that the Applicant has not provided an indication of its preferred option for navigating the issue. The views of Network Rail should also be sought by the ExA related to the Benhall bridge weight limit and the potential use of over bridging methods. At the time of writing this LIR, ESC notes that the use of overbridging methods by NGET, or statutory powers, has not yet been discussed in detail to a point where all parties agree, despite the ongoing efforts being made in the thematic meetings. ESC largely defers to Suffolk County Council as Highways Authority, but wishes to note its concerns regarding the lack of certainty in relation to the disruption created for the community by the works. It should also be noted that Document 9.19 [AS-138] states in section 2.1.45 that *'The area of land to the east of the B1121 is allocated for housing in the Suffolk Coastal Local Plan (Adopted September 2020); it is the site known as 'Land South of Forge Close between Main Road and Ayden, Benhall' (SCLP12.43). The land proposed for temporary construction and storage would include the majority of this allocated land. The temporary use of the site by the Applicant would not affect the long term development of the site for housing'.* ESC notes that 'Outline Application with Some Matters Reserved - Erection of up to 41 dwellings (with details of access to be considered)' (ESC application reference: DC/21/2503/OUT) was recently approved. It will therefore be for the Applicant to liaise with the landowner to seek an appropriate solution regarding any proposed use of that land and the timing of doing so.

6.3.11.13 Finally, ESC wishes to highlight to the ExA that the proposed site for the Sea Link converter station within the wider site masterplan selects the best and flattest site within the land parcel. This means that whilst the proposed access route and limited number of AILs and heavy plant associated with cut and fill activities may suit NGET's project, this may not be the same position for NGV's LionLink project which is 12 to 18 months behind Sea Link in the consenting process. As stated earlier, the Saxmundham site was selected, in part, for its capacity to co-locate more than one converter station. However, if the first project's proposed access into the site does not meet the needs of subsequent projects who are utilising a plot requiring more cut and fill than Sea Link, it may render the access unsuitable for LionLink. The ExA should satisfy themselves that the proposed western access route is viable for a co-located and coordinated site in this regard.

6.4 HVAC (Saxmundham Converter Station to Friston Substation)

6.4.1 Context

6.4.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states in Section 4.2.1 that the Suffolk Onshore Scheme includes *'A HVAC underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station'.*

6.4.1.2 As depicted in the Indicative General Arrangements Plans – Suffolk [APP-038] a High Voltage Alternating Current (HVAC) cable corridor runs from the converter station near Saxmundham back to the proposed Friston substation. This would result in a cable corridor entering the Friston site from the western side.

6.4.2 Co-ordination

6.4.2.1 ESC understands that the HVAC cable route linking the proposed Saxmundham converter station site with the proposed Friston substation site was refined by NGET prior to submission to remove the LionLink project's cables, allowing NGV to fully consider and consult on the most appropriate AC cable route. Nonetheless, Sea Link has been designed to allow space for the future delivery of other projects. Section 4.2.28 within Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states *'Between the proposed Friston Substation and Saxmundham Converter Station the HVAC and HVDC cables for the Proposed Project would be combined within the same construction swathe, this is illustrated on DCO/S/DE/SS/1204 of Application Document 2.13.1 Design Drawings - Suffolk.'* The proposed HVAC connection description therefore contains no options which includes any proposed cable works for the LionLink project (in contrast to the proposed Friston substation section of the document which sets out different connection scenarios).

6.4.2.2 The Coordination Document [APP-363] indicates that co-ordination takes the form of not precluding future projects from coming forward by leaving physical space along the HVAC cable route for up to two other projects. ESC does not consider this to be genuine co-ordination. Genuine co-ordination should seek to reduce the environmental, community, and socio-economic impacts of multiple projects coming forward at similar timescales and in similar geographical areas. NGET's decision to exclude cable ducts and infrastructure associated with NGV's project therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and Sea Link. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between Sea Link and the NGV projects will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV's assessments of the best cable route will be similar to those reached by NGET. ESC feels that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the Sea Link project, this could meaningfully reduce the environmental impacts of both projects.

6.4.2.3 If NGET lays cable ducts for the Sea Link project alone, it becomes more difficult for NGV to align their ducts for the LionLink project as once the cables have been laid, exclusion swathes will be implemented that mean future projects will be forced to locate their cables a greater distance away. Promoters laying cable ducts only for their own project in isolation means each successive developer will have to work around the cables and ducts already laid and the exclusion swathes associated with them. The end result is a much wider cable swathe with successive impacts of construction on the environment and local communities.

6.4.2.4 ESC has repeatedly requested that every opportunity is explored for the co-ordination of the Sea Link and LionLink projects at all stages of the development consent process. In the view of ESC, scheme

co-ordination is critical given the pressures this area of East Suffolk is facing, and it is essential that in-combination effects with other proposed and consented projects are considered and opportunities for co-ordination seized. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities. A succession of construction activities across consented projects effectively elongates the construction time and associated disruption period. Co-ordination would clearly help to reduce this impact.

6.4.3 Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation

6.4.3.1 The current lack of co-ordination is of particular concern around the Friston substation in the context of HVAC cable routes leaving the Saxmundham converter station and heading to the Frison substation. An uncoordinated and piecemeal approach to the cable ducts associated with Sea Link and LionLink will result in multiple separate cable routes entering the Friston substation site, subsequently adversely affecting (or even removing) the mitigation planting around the Friston substation agreed under the East Anglia ONE North and East Anglia TWO project consents. The mitigation planting was required to reduce the visual impacts of the SPR (and NGET) substations consented under the SPR DCOs on the village of Friston. It is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding the co-ordination of cable routes between projects resulting in a greater number of routes chipping away at the consented mitigation. ESC notes that the ExA for the SPR projects states in Section 28.4.4 of the Recommendation Report (Volume 2 – Chapters 18-31[13]) that *'the local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. However, the benefits of the Proposed Development principally in terms of addressing the need for renewable energy development identified in NPS EN-1 outweigh those effects'.* ESC wishes to stress that whilst the overarching need case was found to outweigh the adverse effects introduced, the agreed mitigation across the projects were found to be *only just* sufficient. This reinforces ESC's view that it is unacceptable for the Sea Link project to diminish this mitigation planting.

6.4.3.2 There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the consented landscape mitigation. ESC has a strong preference for NGET to use horizontal directional drilling (HDD) to minimise adverse impacts on this landscape mitigation and this has been raised in multiple meetings by ESC officers prior to the submission of the DCO application.

6.4.3.3 ESC notes the HVAC cable route interaction with the proposed Friston substation is depicted on Sheet 2 of 6 within the submitted Work Plans – Suffolk [APP-021].

6.4.3.4 ESC understands that NGET are reluctant to HDD under the consented landscape mitigation for the SPR projects due to cost. The alternative, however, is open cut and fill trenching through the landscape mitigation. This goes against the fundamental principle of the landscape mitigation scheme, a required measure for the SPR consents to help mitigate landscape visual impacts in the vicinity of Friston village.

6.4.3.5 Bearing in mind that NGET are not proposing any coordination in terms of laying cable ducts for LionLink at the same time as for Sea Link (as discussed earlier), NGET's justification of cost being the primary reason not to HDD under SPR's approved landscape mitigation would subsequently set a precedent for NGV's LionLink project, reducing the likelihood of NGV using HDD methods at a later date (if consented). Any future desire for a coordinated HVAC to use HDD methods to avoid disruption to the landscape mitigation should not be restricted at this stage by NGET. Moreover, NGET is under statutory duties under section 38 and schedule 9 of the Electricity Act 1989 to have

[13] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010061-EA2-Recommendation%20Report-Vol2_Ch18-31%20COMPLETED.pdf

regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and to do what can reasonably be done to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. Cost is not, therefore, the only consideration and there is a statutory duty resting on the applicant to mitigate. By refusing to use HDD in this location, NGET is failing in its statutory obligations, getting the balance of its duties wrong, and infringing the section 38 and schedule 9 duties.

6.4.3.6 The SPR consents included a substation for each of the wind farm projects, and a substation for National Grid at the proposed Friston site. The National Grid substation consented within the SPR DCOs was not justified at that time for its capacity to accommodate connections for future projects at Friston, it was solely intended to serve the needs of the SPR EA1N and EA2 offshore wind farm projects. ESC wishes to highlight that the NGET and NGV projects, if coordinated and sharing a single HVAC cable route, would be required to split before entering the consented landscape mitigation, and effectively punch multiple holes through this due to the projects linking into the National Grid substation at different ends of the National Grid substation site. If HDD is not used to cross the mitigation planting areas, this scenario would leave large gaps in the landscape shielding efforts of SPR. Additionally, it is understood that mitigation planting cannot be placed over buried cable trenches due to root interaction with the cables, resulting in planting gaps in landscaping. Whilst ESC understands that SPR, NGET and NGV are currently exploring options for HVAC cable routing and installation methods. It is therefore highly likely given the current feedback from NGET that open cut trenching will be the preference for crossing SPR's consented landscape mitigation areas, and as explained above, this will dilute SPR's consented landscape mitigation planting areas which were a hot topic of debate at the examination hearings for those projects. Any such detriment in this regard would be a serious concern for ESC and the local community.

6.4.3.7 It is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects. ESC therefore continues to request that NGET review their position on this and includes the ability within their DCO to provide the ducting for the LionLink project and commit to the minimum number of HVAC cable routes which would help to reduce unnecessary disruption to the local community, environment, and consented and secured mitigation planting.

6.5 Friston Substation

6.5.1 Context

6.5.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states in Section 4.2.1 that the Suffolk Onshore Scheme includes *'A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.'*

6.5.1.2 ESC notes from Section 4.2.3 that *'Friston Substation already benefits from development consent granted to Scottish Power Renewables (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'. Given that these consents have yet to be implemented, the Friston Substation is included in the Proposed Project to achieve a comprehensive consenting position.'*, and Section 4.2.4 adds that *'Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology sets out the two scenarios assessed within each of the technical assessment chapters in Part 2 of the Environmental Statement (ES). The first scenario is that Friston Substation is constructed under the SPR consent (with the*

Proposed Project only needing to build a connection into it), with the second scenario assuming Friston Substation is built as part of the Proposed Project.' It is however noted that since the submission of NGET's application documentation earlier this year, both of the SPR EA1N and EA2 projects are understood to have commenced works in July 2025 with the start of the substations haul road stage of works located between the B1069 Snape Road and land west of Grove Road and Grove Wood at the substation site. The commencement of works therefore gives greater certainty that SPR will deliver the substation connection under a Scenario 1 for Sea Link.

6.5.1.3 ESC also notes that the parameters for the Friston substation components would be no larger than those consented as part of the SPR East Anglia ONE North and TWO offshore wind farm projects, should the substation be delivered under Scenario 2 by NGET. Under Scenario 1, of course, the substation would be delivered by SPR as consented.

6.5.1.5 At the time consent was granted for the SPR East Anglia ONE North and East Anglia TWO projects, National Grid advised the Friston substation was sized only for those two projects, and no additional projects. Therefore, it was made clear that further projects connecting to the Friston substation site would require extensions to be made to the National Grid substation. However, as stated above, the Sea Link project now contains two scenarios for the Friston connection. Where the substation is built as part of the Sea Link project, Section 4.2.11 within [AS-093] states that *'The proposed Friston Substation would be constructed using gas insulated technology, with a footprint of up to 16,800 m^2 (excluding drainage, access and landscaping works).'.* However, in the Scenario whereby the substation is built by SPR (as consented), Section 4.2.21 states that *'the works required for the Proposed Project would be limited to the installation of new gas insulated switchgear (GIS) bays and additional switch gear, CSE and associated outdoor structures, cable connections and busbars, all within the boundary of the substation, and the routing of the HVAC cables to the substation.'.* Section 4.2.22 adds *'It is currently assumed that in advance of Sea Link, permanent access, drainage and some advance planting would be installed as part of the SPR East Anglia ONE North and TWO projects.'.*

6.5.2 Co-ordination

6.5.2.1 ESC understands that the proposed works to the existing 4ZW 400 kV overhead line are shown in the Indicative General Arrangements Plans – Suffolk [APP-038]. Irrespective of the connection Scenario taken forwards, it is important that NGET and SPR work together to communicate any changes to proposed substation arrangements which deviate from those already consented for East Anglia ONE North and TWO. The reasons for any proposed changes in relation to the interactions of the projects in this regard will need to be understood. ESC asks NGET to explore every opportunity to coordinate the delivery of the Friston substation including looking to deliver the substation in one phase. If the substation could be built out to accommodate the consented SPR substation, the Sea Link and LionLink projects in one set of works rather than independently and successively, this could shorten the overall length of construction activity impacting local residents.

6.5.2.2 The position regarding the Friston substation has progressed since the examination of the SPR projects. At that time, discussions on the sizing and detail of the Friston substation was predicated on accommodating only the East Anglia ONE North and East Anglia TWO offshore wind farms. Now, the Friston site will accommodate the SPR projects, and potentially the NGET Sea Link and NGV LionLink projects (if consented). As such it is now vitally important to consider how best to deliver the Friston substation, to minimise the impacts of a potentially prolonged construction period across multiple separate projects.

6.5.2.3 ESC remains concerned that NGET reduced the Order Limits, excluding the HVAC cable routes for NGV's LionLink project. The justification given is that other projects are working to different timelines to Sea Link, and also that the exclusion of other projects' infrastructure from the Sea Link redline does not preclude coordination, as the physical space will remain for other projects to use. This leaves the opportunity for promoters to carry out works in the same area in succession without a

clear strategy for coordination, meaning the environment and local communities will be subject to successive impacts. ESC strongly believes that, whilst this may represent co-location, it is not co-ordination as the valuable benefits of co-ordination would not be realised.

6.5.3 Community Impacts

6.5.3.1 The local community has been subjected to a number of years of uncertainty as a result of the East Anglia ONE North and East Anglia TWO DCOs. It is essential that NGET appropriately engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject of previous NSIP proposals. ESC expects that suitable mitigation and compensation is fully explored and implemented in order to offset residual community impacts introduced as a result of this project.

6.5.4 Heritage

6.5.4.1 The impact of the National Grid substation on the surrounding heritage assets at Friston has been discussed at length by ESC and other stakeholders during the East Anglia ONE North and East Anglia TWO examinations. At the scale that the substation has already been considered, there will be adverse impacts of various magnitudes on Little Moor Farm (Grade II), High House Farm (Grade II), Friston House (Grade II), Church of St Mary (Grade II*) and the War Memorial (Grade II), and it will cause the loss of a historic track which is considered a non-designated heritage asset. Should the National Grid substation at Friston need to be extended, this would likely worsen the impacts on these heritage assets.

6.5.4.2 It is understood that the designated heritage assets surrounding the Friston Substation site have been scoped out of the further detailed assessment in ES Chapter 3, as they were assessed as part of the consented EA1N/2 scheme. It should be noted, however, that ESC disagreed with the assessment of the significance of the effects on Woodside Farm (Grade II), High House Farm (Grade II) and the Church of St Mary (Grade II*) at that time.

6.5.4.3 ESC's assessment of the impacts and effects of the National Grid substation and East Anglia ONE North and East Anglia TWO developments are described in the table below. ScottishPower Renewables' assessment[14] is shown in brackets in the table.

Receptor	Sensitivity	Magnitude of Impact before mitigation	Magnitude of Impact after landscape mitigation	Residual Significance of Effect	Significant Effect?	Agreement/Disagreement with ES
Little Moor Farm (Grade II listed building)	Medium (SPR – Medium)	Medium (SPR – Medium)	Medium (SPR – Low)	Moderate (SPR – Minor)	Yes (SPR – No)	Disagreement
High House Farm (Grade II listed building)	Medium (SPR – Medium)	Medium (SPR – Low)	Medium (SPR – Low)	Moderate (SPR – Minor)	Yes (SPR – No)	Disagreement
Woodside Farm (Grade II listed building)	Medium (SPR – Medium)	Medium (SPR – Low)	Medium (SPR – Negligible)	Moderate (SPR – Minor)	Yes (SPR – No)	Disagreement
Church of St Mary (Grade I listed building)	High (SPR – High)	Medium (SPR – Low)	Medium (SPR – Low)	Major (SPR – Moderate)	Yes (SPR – Yes)	Disagreement

[14] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-005195-ExA.AS-30.D11.V1%20EA1N&EA2%20Heritage%20Assessment%20GIS%20Addendum.pdf

Friston House (Grade II listed building)	Medium (SPR – Medium)	Negligible (SPR – Negligible)	Negligible (SPR – Negligible)	Minor (SPR – Minor)	No (SPR – No)	Agreement
Friston War Memorial (Grade II listed building)	Medium (SPR – Medium)	Negligible (SPR – Negligible)	Negligible (SPR – Negligible)	Minor (SPR – Minor)	No (SPR – No)	Agreement
Friston Mill (Grade II listed building)	High (SPR – High)	Negligible (SPR – Negligible)	Negligible (SPR – Negligible)	Minor (SPR – Minor)	No (SPR – No)	Agreement

6.5.4.4 Little Moor Farm has functional and historic links with the surrounding agricultural landscape, which contribute to its significance as an historic farmhouse. The relationship between the listed building and its farmland setting will be fundamentally changed by the introduction of industrial development of the scale proposed. The loss of the historic connection to the village core (including the historic PRoW) and the industrialisation of the open agricultural landscape to the south of Little Moor Farm would severely diminish the contribution that setting makes to its significance.

6.5.4.5 The impact of the proposed development on High House Farm would be similar to that on Little Moor Farm. The listed building has functional and historic connections with the surrounding open farmland, which enhance the rural character of its setting and allow for views across the fields to the village. The introduction of the large-scale industrial development within its setting would have a detrimental impact on the contribution that setting makes to the significance of High House Farm.

6.5.4.6 ESC disagrees with the Applicant's assessment that if only EA2 were to be constructed, the adverse impact would be of low magnitude, giving rise to an effect that would be of minor significance. ESC considers that regardless of whether only EA1N, only EA2 or both substations were to be built, the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance. The agricultural character and openness of the site make an important contribution to the setting of Woodside Farm, as this setting supports the understanding of the building as a historic farmhouse with functional and physical connections to the surrounding farmland and allows views across the landscape. Any scheme which includes EA1N or EA2, individually or together, would interrupt the open agricultural setting of the listed building, and importantly, the National Grid Substation would also still be built.

6.5.4.7 ESC agrees with the Applicant's assessment of the impact on Friston House, Friston War Memorial and Friston Mill. The significance of the effect on these assets would be minor in EIA terms.

6.5.4.8 ESC considers that the OLEMP [AS-059] would not mitigate the harm caused by locating the substations in the setting of Little Moor Farm, High House Farm, Woodside Farm and the church. The proposed large areas of woodland have no historic precedent and merely have the effect of providing a barrier between these heritage assets and their historically open, agricultural setting. The OLEMP would not mitigate the loss of views from the north or the intrusion into the relationship between the church and the dispersed settlement around Friston Moor. While the proposed woodland would partially screen the industrial development, it would in itself be a barrier which obstructs the church's historically open, rural setting. The significance of the effect to Little Moor Farm, High House Farm, Woodside Farm and the church should be considered to be moderate to the farmhouses and major to the church in EIA terms even after mitigation.

6.5.5 Flood Risk

6.5.5.1 ESC draws attention to highlight the historical surface water flooding which has been experienced downstream in Friston. The village has been subject to surface water flooding on multiple occasions and Suffolk County Council as the Lead Local Flood Authority has undertaken Section 19 investigations under the Flood and Water Management Act 2010 which should be taken into consideration by the ExA. It is important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia ONE North and East Anglia TWO projects. ESC defers to the LLFA and EA on flood related matters.

6.5.5.2 It is understood from Section 4.8.3 of Part 2 Suffolk Chapter 4 Water Environment [APP-051] that *'Saxmundham Converter Station and Friston Substation would be served with drainage systems that embed SuDS for attenuation of runoff to green field runoff rates in line with the requirements of the receiving watercourse authorities (Internal Drainage Board, Environment Agency or Lead Local Flood Authority and provide treatment of runoff (Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk).'.* ESC defers to the LLFA and EA on flood matters but supports the embedded measures. A green field runoff rate means that NGET will not make the existing flood issue any worse, in the same way that SPR were required to do so under their own DCO consents. As the ExA will be aware, there is an existing flooding issue in Friston which has been an issue for local residents for many years. It is understood that this primarily links back to the existing watercourse not being sufficiently maintained and silting up over time, reducing the capacity to capture and move surface water runoff. This results in flooding during times of heavy rain or ground water saturation.

6.5.5.3 The ExA's Recommendation Report to the Secretary of State for the East Anglia ONE North and East Anglia TWO projects noted that a matter of concern throughout the examination was whether enough space had been provided within the Order Limits to prioritise a SuDS strategy for managing surface water, for both the construction and operational phases of the projects. ESC raised particular concern in the examination about the risk of surface water flooding during construction, given the areas used in construction would potentially be far greater than that during operation; large swathes of land would be stripped of topsoil and used for construction purposes including compounds and storage. All of these activities have the potential to increase surface water runoff rates and generate sediment which could have a detrimental impact to surface water flood risk in Friston. The lack of land availability was raised by Interested Parties in the examination as a concern in relation to the deliverability of drainage solutions. At that time, the ExA was unable to conclude that the construction drainage scheme would be satisfactory. The flood risk posed to the village of Friston during construction and operation was therefore a matter of great concern for the local community and was raised by multiple stakeholders and Interested Parties in the examinations for the SPR projects.

6.5.5.4 It is vital that the Sea Link Order Limits and DCO reflect the drainage arrangements and mitigation secured under the SPR DCOs or demonstrate an acceptable alternative solution. ESC notes that the ExA requested in its letter issued on 8 July 2025 under section 89(3) of the Planning Act 2008 [PD-005] that the Applicant provide *'a table detailing the 'intentional differences' between scenario one and scenario two schemes including the connection to the overhead line network, ancillary works, landscaping and surface water drainage proposals.'* In response to this request, the Applicant submitted a 'Friston Substation Update Letter' on 30 September 2025 [AS-148], in which it states: *'To provide the relevant planning authorities with more reassurance and control over the final drainage proposals, National Grid is proposing to add production of an Operational Drainage Management Plan to the list of plans to be approved under Requirement 6. This update will be made in the next iteration of the draft DCO.'* This is welcomed by ESC.

6.5.5.5 ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter [CR1-004] and detailed in the Change Application Consultation Document [CR1-003]. ESC understands that under Change 2, the Applicant intends to adjust the limits of deviation for the proposed new substation at Friston (Kiln Lane) in line with the area consented for EA1N and EA2 to provide consistency.

6.5.5.6 As stated in its response to the consultation on the proposed changes, ESC welcomes any attempt to achieve a degree of clarity and consistency around the proposals for the substation at Friston. However, it is queried whether the change does actually add consistency, as the Rule 9 Letter [PD-011] notes that the limits of deviation presented do not in fact entirely align with those of EA1N Order.

6.5.5.7 ESC considers that this existing and well documented issue presents an opportunity for legacy project benefits, if the project is consented. Reducing existing and known flooding issues in the village of Friston would provide a lasting benefit for the local community and this should be fully explored over and above the requirements of the project. A legacy benefit of this nature would be supported by ESC, however, any such legacy benefit would need to be balanced against any other impacts introduced by the project.

6.5.6 Noise

6.5.6.1 In relation to operational noise, ESC notes that Part 2 Suffolk Chapter 9 Noise and Vibration (Version B) [AS-109] states *'Although potential operational noise from the Friston substation was originally proposed to be included in the scope of the ES (other than noise from switch gear and auxiliary plant, which was agreed to be scoped out – see Scoping Report and Scoping Opinion) it has since transpired that there are no other potential sources of noise proposed during normal operation (i.e. there are no proposed transformers or similar plant). As such, operational noise from the normal operation of the proposed Friston Substation is not considered further within the assessment.'* ESC does not agree as this substation is subject to a site rating level imposed by East Anglia ONE North and East Anglia TWO DCOs, therefore NGET needs to be very confident that the introduction of a further or different equipment will not impact that constraint. As identified above, it is important that the impact of the operational noise of the substation is considered in relation to nearby receptors including ecological receptors such as birds and other fauna.

6.5.7 Landscape and Arboriculture

6.5.7.1 It is established by the required assessments, and it is stated in Part 2 Suffolk Chapter 1 Landscape and Visual of the ES [APP-048], that there will be significant adverse effects during construction, operation, and decommissioning for four viewpoints if Scenario 2 for the Friston substation connection were activated where NGET provides the substation instead of SPR. This would be because of a lack of intervening vegetation which is an issue across these proposed sites.

6.5.7.2 ESC agrees with the conclusions presented in Tables 1.11 and 1.12 of [APP-048] in relation to the landscape and visual impacts of the Friston substation site during operation and maintenance, with the following exception:

- VP6a: Mitigation is effective as far as it goes but perhaps could have gone further beside the footpath going south west.

6.6 Construction and Maintenance Compounds

6.6.1 Context

6.6.1.1 Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states in Section 4.6.13 that *'In order for the elements of the Suffolk and Kent Onshore Schemes to be constructed, enabling works are required such as the*

establishment of construction compounds, temporary bellmouths and access tracks and drainage works. The enabling works are consistent across all elements of the Onshore Schemes'. Section 4.6.20 adds that *'Temporary construction compounds would be established at the converter station and substation sites as well as along the HVDC and HVAC underground cable and overhead line routes to facilitate construction activities.'* ESC understands from Section 4.6.21 that *'These compounds store all materials necessary for the works, including plant, waste, cable ducts, cable drums and accessories. In addition to storage, compounds also provide a location for site offices, parking and welfare facilities for construction operatives.'*

6.6.1.2 ESC has reviewed the indicative location of the construction compounds for the Suffolk Onshore Scheme (illustrated on Indicative General Arrangement Plans – Suffolk [APP-038]). ESC request that NGET seek to coordinate construction compounds with the NGV LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site. It is essential that the compounds remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to protect the amenity of nearby receptors.

6.6.2 Ecology

6.6.2.1 ESC notes that a refinement to the construction compound on land south of North Warren RSPB Reserve reduces the size of the compound and moves it further from the RSPB Reserve, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Sandlings Special Protection Area (SPA). It is understood that together with the Applicant's proposed noise and visual mitigation measures, the refinement seeks to address the disturbance impact on these designated sites and render them to be non-significant. Whilst the reduction and relocation of this construction compound to help address potential impacts on the designated sites is welcomed, it is noted that the noise modelling undertaken to inform the ES concludes that the noise disturbance threshold (60 dB LA Max) will be exceeded during the setup of the HDD compound (Paragraph 2.9.41 of Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Version B) [PDA-017]). Whilst this set up is only expected to take 1 month, in the absence of additional mitigation the ES concludes that the impact on feature bird species within the designated sites could be Moderate adverse. To address this impact the submitted CEMP requires that compound setup must be undertaken between September and January, outside of the nesting season for woodlark and nightjar. Only with all of the identified avoidance and mitigation measures implemented can the ES conclusion of Negligible, Not Significant effect from noise and visual disturbance on designated sites at this HDD compound be relied upon.

7. Project-wide Commentary – Thematic Topic Areas

7.1 Landscape and Arboriculture

7.1.1 Matters relating to the primary areas of concern are discussed in the site-specific sections earlier in this LIR. These primarily relate to the proposed converter station site, River Fromus crossing, and the proposed onshore cable routes within the East Suffolk district.

7.1.2 The intention to retain vegetation where practicable is noted and ESC will expect retained vegetation to be fully protected according to recommendations contained in BS5837:2012 Trees in Relation to Construction. Further, ESC will expect all proposed hedgerow crossings along the cable route and hedgerows affected by the converter station proposals to be assessed against the criteria for 'Importance' laid out in the 1997 Hedgerow Regulations. Where hedgerows meet the criteria for 'Importance' under the Regulations, ESC will have an expectation that these should be retained at least along the cable route and alternative solutions to open trenching put forward.

7.1.3 ESC notes from Section 1.6.3 within the Outline Landscape and Ecological Management Plan – Suffolk (Version B) [AS-059] that *'The contractor appointed by National Grid to construct the Suffolk Onshore*

Scheme will be responsible for establishing, managing and monitoring the implementation and establishment of landscape and ecological mitigation within the establishment aftercare period. National Grid will inspect and report on the success of establishment during this period.' The proposed aftercare period for reinstatement and mitigation planting is noted, but it should be understood that ESC will be requiring this five-year period to also apply to all replacement planting that covers any plant failures. i.e., it should be a rolling five-year period for all planting from the time of planting. The limitations of replacing removed trees in a like for like basis in the vicinity of installed electrical cables is understood. ESC also highlights that Requirement 9 'Reinstatement schemes' part 2 within the draft DCO (Version D) [AS-087] states that *'The requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development'.* ESC does not accept the 10m exception to the reinstatement of land, noting this would leave large gaps in hedgerows where in proximity to buried cables, causing habitat fragmentation. This element should be removed from the requirement.

7.1.4 The role of mitigation planting in moderating the magnitude of effects over time is an important factor in the assessment as is a realistic understanding of growth rates for new planting in the East of Suffolk. It needs to be understood that erratic and unpredictable rain fall patterns can be a very limiting factor in successfully establishing new tree and shrub planting in this region. Anticipated growth rates within the Landscape and Visual Impact Assessment (LVIA) are an important consideration, informing photomontages/wireframes depicting mitigation planting at Year 1, Year 5, and Year 15 post planting.

7.2 Ecology and Biodiversity

7.2.0.1 ESC has reviewed the Applicant's submitted Ecology and Biodiversity chapter in the ES [PDA-017], together with the information to inform Habitats Regulations Assessment (HRA) report [AS-007] and the Biodiversity Net Gain (BNG) Feasibility Report [AS-055]. The following section considers the ES conclusions in relation to potential impacts on ecological receptors.

7.2.1 Ornithology – Breeding and Wintering

7.2.1.1 The Environmental Statement (e.g. Chapter 2 Appendix 2.2.B Suffolk Wintering Bird Survey Report, paragraph 1.5.36 [PDA-025]), recognises that bird surveys have not obtained complete coverage of all of the land within the Order Limits for enough of the survey period.

7.2.1.2 Some species are therefore likely to have been under recorded, which in turn may have led to their importance being categorised at a lower level than should be the case. This is of concern for some species in some locations within the Order Limits, as some of the bird species recorded breeding within the Order Limits, including woodlark, are species of importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act) (2006)) and/or are listed on Schedule 1 of the Wildlife and Countryside Act (1981) (as amended). Paragraphs 5.4.54 and 5.4.55 of *NPS EN*-1 and East Suffolk Council Suffolk Coastal Local Plan policy SCLP10.1 require that such species are protected from the adverse effects of development. It is also acknowledged that the applicant has assessed all bird receptors as being of at least 'Regional' importance, with breeding and wintering species east of Leiston Road being assessed as of 'National' importance and breeding SPA species (woodlark and nightjar) east of Leiston Road being assessed as of 'International' importance. Therefore, the only areas/receptors where a greater significance could potentially be attributed would be breeding and wintering birds west of Leiston Road.

7.2.1.3 Based on these assumptions, ESC hopes that the ExA will examine this issue carefully in light of the worrying limitations in survey coverage, particularly if species specific mitigations are proposed. For example, general mitigation to avoid impacts on breeding birds includes clearance of suitable areas of habitat outside of nesting periods considered to be March to August inclusive (Construction

Environmental Management Plan Register of Environmental Actions and Commitments (CEMP REAC) [APP-342] Action B02). However, species such as woodlark will start nesting earlier in the year than other species and therefore may begin to utilise areas that have been cleared in late winter before construction activities begin in the spring. Whilst Action B24 in the CEMP REAC [APP-342] seeks to address this, it only applies to works in arable fields or acid grassland areas, not areas of potentially suitable nesting habitat that might be created by other clearance/construction activities. Such impacts, and the need to mitigate for them, must be adequately considered and addressed in the appropriate management plans, including the potential for overlapping measures to conflict such as CEMP REAC Actions B02 (clearance of vegetation outside of bird nesting season) and B05 (clearance of vegetation during reptile active season). As set out in 7.2.1.5 below, the implementation of mitigation measures must be informed by pre-construction surveys and should be deployed in all necessary areas, rather than being potentially limited in scope by constraints on location imposed by CEMP REAC Action B24. The CEMP REAC should be amended to address this so that it is ensured that the necessary mitigation measures are appropriately captured in the plans which will be proposed under DCO Requirement 6.

7.2.1.4 The overall assessments of the importance of bird receptors throughout the Order Limits are sufficiently high to address the significances assigned to the different receptors. However, it is important that the species-specific mitigation measures (for birds and other protected species) secured as part of the project interact with each other appropriately, so that the implementation of one measure does not create the need for either an additional future measure to be implemented or an additional constraint on the delivery of the project. For example, winter clearance of vegetation for nesting birds creating new habitat for ground nesting species like woodlark which may set up territories before construction works then commence the following spring.

7.2.1.5 As currently presented, the OCEMP [AS-127] and OLEMP [AS-059] do not include firm commitments to pre-construction surveys, which will be required to inform the detail of the necessary construction mitigation measures. Whilst paragraph 7.1.1 of the OLEMP makes reference to pre-construction surveys, no detailed mechanism is included for the scope of these to be agreed with the Local Planning Authority, nor is there a commitment for the results of such surveys and how they have informed detailed mitigation measures to be reported to and agreed by the Local Planning Authority prior to relevant phases of the development commencing. This would help address the concerns set out above and should therefore be secured as a commitment in the OCEMP and OLEMP to be discharged under the relevant DCO requirement (Requirement 6).

7.2.2 Hazel Dormouse

7.2.2.1 Hazel dormouse is a European protected species (under the Conservation of Habitats and Species Regulations (2017) (as amended)) and a UK species of principal importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). The considerations set out in NPS EN-1 paragraphs 5.4.16 and 5.4.17 and East Suffolk Council Suffolk Coastal Local Plan policy SCLP10.1 (Biodiversity and Geodiversity) are therefore relevant to this species.

7.2.2.2 Part 2 Chapter 2 (Ecology and Biodiversity) of the Environmental Statement [PDA-017] reports that surveys recorded a potential hazel dormouse nest (comprising one green leaf nest with a partially woven structure) within the Order Limits during the October 2024 survey visit, indicating the possible presence of hazel dormouse within Zone D. This is potentially a significant record as hazel dormouse has not previously been recorded in this part of East Suffolk. The Hazel Dormouse Survey Report [APP-108] recommended that further surveys were undertaken within Zone D prior to vegetation clearance being conducted. However, the ES chapter [PDA-017] contradicts this and notes that a precautionary approach for removal of vegetation suitable for hazel dormouse would be followed. The ES identifies that hazel dormouse is considered to be of negligible importance within the Suffolk

Order Limits as none have been identified to be present. The ES concludes that habitat loss impacts for this species are considered to be a negligible impact leading to a negligible effect that is not significant.

7.2.2.3 As well as a failure to undertake further survey for this species which should have been triggered by the find of a potential nest, the survey work undertaken to date in the area where the nest was found does not meet the level effort set out in the best practice guidance which was in place at the time the surveys were undertaken.

7.2.2.4 The Hazel Dormouse Survey report [APP-108] justifies its conclusions on the basis that the minimum scoring (20 points) was exceeded for Zone D (20.1 points claimed achieved), however ESC does not consider that this is accurate. The scoring calculation set out in Table A.2 of the report 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. 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. The guidance is clear that scores below 20 "*may sometimes be enough to detect dormice, but assumed absence should not be based on a search effort score of less than 20*".

7.2.2.5 The presence or likely absence of hazel dormouse within the Order Limits, and if present the extent to which the species may be impacted by the proposed development, is significant from planning policy, wildlife legislation and nature conservation perspectives. The evidence of potential presence, coupled with the insufficient initial survey effort and failure to commit to further surveys means that the likely impact on this species cannot be established. Nor can it be confirmed whether the level of mitigation currently proposed is acceptable, or whether a Natural England mitigation licence will be required.

7.2.2.6 Given the findings presented to date and the current deficiency in survey effort, ESC considers that it is essential that further surveys are undertaken in order to try to establish confirmed presence and inform the need for species specific mitigation and if necessary, mitigation licensing. These surveys must follow the latest best practice survey methodologies as published in the Dormouse Conservation and Mitigation Handbooks (both March 2025). This should include the use of footprint tunnels which East Suffolk Council previously advised the applicant to utilise, but which have not formed part of the survey methodology to date (as they were not a survey technique required in the previous version of the handbooks). In the absence of this further survey work, it is unclear how the impact and mitigation conclusions presented in the ES can be considered to be accurate enough to be relied upon for the assessment of the DCO, if loss of habitat suitable for dormouse is part of the project in this area. To inform the deployment of appropriate mitigation measures, sufficient further surveys must have been completed prior to construction commencing. This must be committed to in the OLEMP, at present section 7.1 of the OLEMP [AS-059] makes no reference to any further survey work or monitoring for dormice.

7.2.2.7 It is noted that paragraph 3.4.2 of section 3.4 (Protected Species Licences) in the most recent Outline Landscape and Ecology Management Plan (OLEMP) [AS-059] states that a precautionary method statement for hazel dormice will be followed which will involve supervised clearance of habitat potentially suitable for this species. ESC does not consider that this methodology alone, in the absence of further survey effort, is adequate to address potential ecological or legal impacts on the species. Whilst supervised clearance may avoid killing or injury of individual animals, it will not

address impacts arising from habitat loss or habitat fragmentation both in the short and long term. Failure to do so is contrary to paragraph 5.4.35 of EN-1. The potential requirement a Natural England mitigation licence is also relevant to the Secretary of State's decision making in accordance with paragraph 5.4.45 of EN-1. The OLEMP should be updated to include mitigation measures that can be deployed in the construction phase to address impacts arising from short to medium term habitat fragmentation, if the further surveys (as described in 7.2.2.6 above) identify the presence of hazel dormice within the DCO Order Limits. Measures to retain connectivity must ensure that there is no break in linear vegetation to avoid dormice having to cross gaps along the ground. Mitigation measures proposed to retain bat connectivity would not achieve this as permanent gaps would remain for the haul road during the construction phase. An alternative crossing structure, such as an Animex bridge (https://ptes.org/campaigns/dormice/hazel-dormouse-conservation/dormouse-bridges/) may be appropriate to maintain the necessary connectivity between retained areas of dormouse habitat.

7.2.3 Red Deer

7.2.3.1 The ES notes that there has been local feedback that large herds of red deer congregate in the field where the trenchless launch pit is proposed to be located. Red deer have been accorded 'Local' importance. As red deer have large ranges, and the field is considered to be a small part of a much wider area which is used by the deer and so therefore there will be considerable remaining habitat available to them, the ES concludes that the project will result in a negligible impact on a receptor of Local importance, resulting in a negligible effect that is not significant. Whilst ESC does not disagree with the ES conclusion on this species, it should be ensured that the presence of red deer is considered as part of the design of any site fencing, including ensuring that fencing does not direct deer towards roads or other hazards or trap them within confined areas, and adequately protects new landscape planting from deer browsing. This could be achieved through the approval of detailed fencing plans as part of the LEMP, with the commitment for this being included in the OCEMP.

7.2.4 Hedgehog

7.2.4.1 The ES states that hedgehog, a species of importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act) (2006)), are difficult to survey for and there is no agreed standard survey methodology. The ES goes on to say that given the prevalence of hedgehog in the east of England and the extent of the Suffolk Onshore Scheme the hedgehog population is of 'District' importance. The ES concludes that subject to the implementation of the identified mitigation, the development will result in a negligible impact on a receptor of 'District' importance resulting in a negligible effect that is not significant. Whilst ESC does not disagree with this conclusion, to ensure that it is accurate, measures to protect hedgehogs during construction vegetation clearance must be included in the OCEMP REAC [APP-342] and OLEMP [AS-059], with final details discharged as part of the LEMP. These measures should include avoiding clearing areas of habitat suitable for hedgehog hibernation during the hibernation period and outside of the hibernation period inspection of all suitable habitat by an Ecological Clerk of Works prior to any mechanical clearance. This is important as, unlike many other species, hedgehogs will not normally disperse when disturbed and instead will curl into a ball making them vulnerable to killing or injury during vegetation clearance.

7.2.4.2 There will be temporary hedgerow loss during the Suffolk Onshore Scheme however, these gaps are proposed to be restored. In the long term the ES concludes that permanent habitat gains will arise from woodland and hedgerow planting around the Saxmundham Converter Station and Friston Substation and along the permanent access roads. This is therefore assessed as a negligible impact on a receptor of 'District' importance resulting in a negligible effect that is not significant. Notwithstanding this conclusion, ESC considers that it is important that the Construction Environment

Management Plan (CEMP) includes mitigation measures for hedgehog when potentially suitable areas of habitat are being cleared for construction.

7.2.5 Bats

7.2.5.1 Surveys have recorded at least nine bat species: Common Pipistrelle, Soprano Pipistrelle, Nathusius' Pipistrelle, Serotine, Barbastelle, Brown long-eared bat, Leisler's bat, Noctule and Myotis bat species. The Myotis bat records could be several different species in the Myotis genus which have similar call structures which cannot always be accurately separated in the call analysis software.

7.2.5.2 All resident species of bat in the UK are European protected species (under the Conservation of Habitats and Species Regulations (2017) (as amended)). Four of the bat species recorded within the Order Limits (Soprano Pipistrelle, Barbastelle, Brown long eared bat and Noctule) are UK species of principal importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) and all bat species in Suffolk are local species of conservation importance under the Suffolk Bat Local Biodiversity Action Plan. The considerations set out in NPS EN-1 paragraphs 5.4.16 and 5.4.17 and East Suffolk Council Suffolk Coastal Local Plan policy SCLP10.1 (Biodiversity and Geodiversity) are therefore relevant to this species group.

7.2.5.3 As part of the bat activity surveys, nine static bat detectors (along with walked transects) were used, with one static detector deployed per transect route. Each point was surveyed eight times, with all nine detectors experiencing failures at some point during their deployments. In total, less than the best practice minimum survey effort of five nights per survey was encountered on 23 of the 72 surveys (9 detectors for 8 survey periods), which is an approximately 32% failure rate (from [APP-107] Table 1.4). The applicant acknowledges these failures but concludes that an average of 5 nights per survey period was achieved across the whole survey season by all detectors except those at survey points 2, 7 and 9 ([APP-107], paragraph 1.3.24). Based on the data in Table 1.4, ESC agrees that survey effort at points 7 and 9 did not meet best practice minimum, survey point 2 does appear to have met it but survey point 5 does not. In ESC's experience an equipment failure rate of almost a third is higher than would normally be expected but of more concern is that this has resulted in a third of the transects (3 out of 9) being subject to less than sufficient survey effort. It also appears that no effort was made to address equipment failures by redeploying detectors in the same months. Whilst it is acknowledged that this would not have been possible where surveys were undertaken at the end of a month (such as August and September 2023), there is no obvious reason why it couldn't have been done where surveys were initially undertaken at the beginning or in the middle of a month (such as for August and September 2024). Failure of so many detectors to achieve sufficient survey effort at survey points in August and September 2024 (5 of 9 in August and 7 of 9 in September) means that a key part of the bat active season has been missed. In that period young bats born in the summer will have become free-flying and summer maternity roosts will be dispersing, survey effort in these months would therefore be expected to identify routes being used by bats to disperse from maternity roost sites to mating (and later hibernation) roosting areas, along with any areas that form part of important foraging habitat for bats in this period which is a critical part of their lifecycle as they gain weight ahead of hibernation.

7.2.5.4 Survey effort below the best practice minimum may have resulted in the under recording of both the number of bat species present and, more importantly, the amount of bat activity of each species in the affected survey locations. This in turn may result in insufficient avoidance or mitigation measures (e.g. the use of trenchless techniques to avoid removal of important hedgerows) being implemented in some locations, thus resulting in project impacts which are greater than those set out in the ES.

7.2.5.5 It is understood that the applicant intends to mitigate all hedgerow crossings as though they are important hedgerows for bats, irrespective of field survey results, and therefore they consider that survey results for individual areas are less relevant. Measures for this are described in the OCEMP REAC action B07 [APP-342] and OLEMP paragraphs 3.3.6 to 3.3.10 [AS-059], involving temporarily

'bridging' construction gaps with dead hedging, hazel hurdles, Heras fencing or similar. No consideration appears to have been given to avoiding important hedgerow removal through the use of trenchless construction techniques to avoid the need for hedgerow loss. Nor is evidence provided that the identified mitigation measures are technically achievable at all potential hedgerow crossing points. The OCEMP REAC and OLEMP must be updated to provide adequate justification for the mitigation measures proposed and demonstration that they are technically achievable.

7.2.5.6 It is also understood that the applicant considers that, despite the equipment failure, sufficient survey effort has been achieved across the project area to adequately inform the ES conclusions. Whilst the intention to mitigate all hedgerow crossings as though the hedgerow is important for bats is welcomed, ESC's experience from other NSIPs suggests that this commitment may not always be achievable in practice once detailed construction design work has been undertaken post-consent. Without sufficient survey information it is impossible for the LPA to know which hedgerows are actually important for bats and therefore be able to determine whether any future variations in mitigation for specific crossing points may be appropriate. It is important that the LPA has this information as variations will likely be dealt with via discharge of Requirements which will be an LPA matter to determine.

7.2.5.7 As a subsidiary point, ESC also disagree that sufficient survey effort for the whole project area is an adequate proxy for sufficient survey effort at different locations along the cable route. Whilst it may give an indication of the overall bat assemblage in the area, as set out above it does not allow for a detailed understanding of potential impacts at different points along the route and thus risks compromising the delivery of effective avoidance and mitigation measures as part of the project.

7.2.5.8 The approach to mitigating impacts on hedgerows used by foraging/commuting bats proposed by the applicant attempts to mask the identified deficiencies in bat survey work. Whilst in principle the proposal to mitigate all hedgerow crossings as though the hedgerow is important for bats is welcomed, ESC have significant concerns that it is achievable in practice. It also misses the consideration of whether impacts on hedgerows important for bats could be avoided through the use of trenchless construction techniques.

7.2.5.9 Further bat activity surveys are required in locations where equipment failures have resulted in survey effort less than that set out in the published best practice guidance (that is, survey points 5, 7 and 9). Dependent on the time which elapses before these are undertaken, they will potentially need to form part of a complete bat activity survey update at all transect locations prior to construction commencing. Whilst section 7.1 of the OLEMP [AS-059] makes reference to updated baseline surveys for bats (amongst other species), it is not explicit in what types of surveys these will involve or what locations will be covered. This should be clarified so that it is clear what pre-construction surveys will be undertaken, how they will be reported to the Local Planning Authority and how their results will be used to inform final details of mitigation measures.

7.2.6 Reptiles

7.2.6.1 Chapter 2 (Ecology and Biodiversity) of the Environmental Statement [PDA-017] notes that the acid grassland (north of the Aldeburgh golf course and west of the North Warren RSPB reserve) has a good population of Common Lizards and Slow Worm and a low population of Grass Snakes and Adders. All of these species receive legal protection from killing and injury under the Wildlife and Countryside Act (1981) (as amended) and are species of importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act) (2006)). The considerations set out in NPS EN-1 paragraphs 5.4.16 and 5.4.17 and East Suffolk Council Suffolk Coastal Local Plan policy SCLP10.1 (Biodiversity and Geodiversity) are therefore relevant to this species group. This acid grassland will be removed for the proposed construction of the trenchless pit, compound S10, and cable trenches. It is noted that only part of the suitable areas of acid grassland will be temporarily lost, these areas are said to be surrounded by more larger areas of acid grassland and

heathland habitat. The project proposes to move reptiles into these areas using the displacement method and a two-stage cut (as secured by OCEMP REAC [APP-342] B05). The ES states that, with the precautionary methods described, the risk of killing or injuring is considered a negligible impact on a receptor of 'District' importance, resulting in a negligible effect that is not significant [PDA-017]. Whilst this overall conclusion is not disagreed with, ESC considers that due to the size of the area of habitat impacted by these works, trapping and translocation mitigation combined with displacement may be required in place of displacement only. The detail of the necessary mitigation should be secured as part of the OLEMP [AS-059] for discharge as part of a LEMP.

7.2.7 Biodiversity Net Gain (BNG)

7.2.7.1 ESC welcomes the project's target of obtaining at least 10% biodiversity gain in Suffolk. The Biodiversity Net Gain Feasibility Report [AS-055] notes that currently the Proposed Project is predicted to result in a net loss for area habitat units in Suffolk, a net gain in hedgerow units in Suffolk, and a net gain in watercourse units in Suffolk.

7.2.7.2 Approximately 33% of the total area habitat biodiversity units are anticipated to be delivered on site, through the provision of landscape planting surrounding the converter station in Suffolk and through landscape and riparian planting along the River Fromus. Three options are then presented for how the remaining gain may be delivered, but no final option is selected.

7.2.7.3 Whilst mandatory BNG for NSIPs is not yet in force, paragraphs 4.6.1 and 4.6.2 of NPS EN-1 identify that delivering environmental and biodiversity net gains are an important part of development projects. Paragraph 4.6.11 encourages details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.

7.2.7.4 ESC considers that for true Biodiversity Net Gain to be delivered as part of the project, it is essential that the offsite delivery portion is secured as part of the consent, either as part of the DCO/Deed of Obligation or a standalone Section 106 agreement with the LPA. This should include securing delivery of the initial habitat creation/enhancement measures, a minimum of 30 years of management of these habitats (although management for the operational life of the development would be preferred), and long-term monitoring of the habitats. Without this information and security, the LPA cannot be confident that the necessary gains will be delivered, nor will ESC know what its role will be in securing, monitoring and enforcing delivery of these gains.

7.2.7.5 Details of how the necessary offsite gains will be secured, delivered, managed and monitored, including whether the LPA needs to enter into any legal agreement with the applicant for this purpose, are therefore required before the close of this examination.

7.2.8 Information to Inform Habitats Regulations Assessment (HRA)

7.2.8.1 The HRA report [AS-007] has screened in a number of impacts for Appropriate Assessment. Whilst ESC primarily defers comment on the Appropriate Assessment process to Natural England, ESC highlights the following point in relation to the assessment of impacts on birds for which the Minsmere-Walberswick Special Protection Area (SPA) is designated:

- Construction/decommissioning phase noise and visual disturbance of nesting woodlark and nightjar at Sandlings SPA, and wintering birds using functionally linked land for Alde-Ore Estuary SPA/Ramsar. The HRA notes from meetings with Natural England that a 60 dB LAmax threshold has been agreed as being a reasonable precautionary threshold for which to assess significant disturbance against. The HRA notes that no mitigation is needed to achieve this, beyond standard noise mitigation methods such as close board fencing. The noise fence will also act as a visual screen and thus protect birds in the SPA from visual disturbance. With regards to non-breeding birds of the wetland parts of the RSPB North Warren reserve, the HRA states that the noise modelling identified that the 60 dB LAmax

contour will only overlap with the RSPB reserve east of the former railway (the wetland parts of the reserve) to a very small extent. The affected small area of reserve does not support significant numbers of SPA/Ramsar birds. Therefore, no Adverse Effect on Site Integrity (AEoSI) of Minsmere-Walberswick SPA or Alde-Ore Estuary SPA will arise due to noise disturbance impacts of the Proposed Project on functionally linked habitat in RSPB North Warren Reserve. ESC defers detailed comments on this matter to Natural England and the RSPB. Whilst ESC considers the breeding and wintering bird assemblages east of Leiston Road to be of 'National' importance and those associated with the Sandlings SPA to be of 'International' importance, ESC understands that the North Warren site also supports species (such as breeding Marsh Harrier) which are functionally linked to the Minsmere-Walberswick SPA population. It must therefore be ensured that impacts on such species, and the designated sites which they are associated with, are fully assessed and addressed.

7.2.9 General approach to avoidance and mitigation measures

7.2.9.1 Whilst it is acknowledged that the project seeks to embed a number of ecological avoidance and mitigation measures, it is concerning that some of these measures to narrow construction gaps in hedgerows are caveated with the phrase 'where practicable', such as measure B07 in the CEMP (Appendix A - Outline Code of Construction Practice) [APP-341]. It is unclear how this will be determined or what will happen if it is decided that a particular measure is not practicable. These measures are related to avoiding or mitigating impacts on features of high biodiversity importance, and if such measures are deemed not to be practicable then adverse impacts are likely to occur which would go beyond those assessed in the ES.

7.2.9.2 Also, as raised in pre-application consultation, it is unclear why some construction mitigation measures are being included in the OLEMP [AS-059] rather than the OCEMP and its appendices ([AS-127], [APP-341] and [APP-342]). It is ESC's opinion that all construction mitigation measures should be included within the Construction Environmental Management Plan (CEMP), and all post-construction habitat management and monitoring measures should be included in the Landscape and Ecological Management Plan (LEMP), rather than construction mitigation measures being split across the both the CEMP and LEMP. This will reduce the chance of future confusion when the project moves into the delivery phase and avoid the chance of necessary measures being overlooked as they won't be split between several documents.

7.3 Design and Heritage

7.3.1 Design and Heritage Narrative

7.3.1.1 Both Design and Heritage considerations are discussed within the Site-Specific Commentary sections presented earlier within Section 6 of this LIR.

7.3.2 Archaeology – Neolithic Henge, Friston

7.3.2.1 It is understood from additional submissions made by SCC to PINS dated 18th August 2025 [AS-074] and 1st September 2025 [AS-083] that following the submission and acceptance of the Sea Link DCO application to PINS, *'during phase 2b of the archaeological trial trench evaluation work (Oxford Archaeology report 2864), a Neolithic hengiform monument has been identified in the Parish of Friston, and which is a previously unknown site of high archaeological significance. Due to the timing of this discovery, details of this site were not available within any of the submitted archaeological assessment reports and as such, impacts upon this site were not assessed within the submitted Environmental statement Chapter 3: Cultural Heritage (Document 6.2.2.3)'.*

7.3.2.2 It is also understood from SCC's additional submissions to PINS that *'The Neolithic Henge consists of a c.90m wide ring ditch, with ditches 4-5m wide and up to 2.5m deep (as confirmed by hand excavation and augering), with associated internal and external features and containing finds of*

Neolithic date. These types of monuments are extremely rare in the county, with very few having previously been subject to any archaeological investigation, and as such are considered of be of high significance. Historic England have been informed of the discovery of this site and have advised that it is of schedulable quality and therefore should be considered to be of national significance'.

7.3.2.3 Finally, SCC state *'Due to its significance, preservation in situ is considered by Historic England and Suffolk County Council as the only appropriate way to manage this site. Within submitted plans, the proposed cable corridor runs through the centre of this monument and therefore Suffolk County Council and Historic England advise that the applicant should be required to consider alternatives to the current route in this part of the scheme, in order to appropriately mitigate against impacts to this significant heritage asset. Historic England and Suffolk County Council would not, however, consider directionally drilling beneath the monument as acceptable mitigation given the potential risk for negative impacts to occur'.*

7.3.2.4 ESC was previously unaware of this discovery and whilst it defers to the SCC Archaeological Service (SCCAS) and Historic England on the management and handling of such archaeological matters, ESC shares SCC's significant concerns. ESC understands that the Neolithic henge is located directly on top of the Applicant's proposed cable corridor and ask that the appropriate level of assessment and mitigation is accorded to this newly identified and significant project constraint.

7.3.2.5 ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter [CR1-004] and detailed in the Change Application Consultation Document [CR1-003]. ESC understands that under Change 3, the Applicant is proposing to adjust the Order Limits in the vicinity of the henge, specifically to exclude the henge, and extend the Order Limits to enable the cable route to be routed either side of the feature. Whilst ESC supports this proposal, it defers to SCCAS on these matters.

7.3.2.6 As stated in its response to the consultation on the proposed changes, ESC considers that the Applicant must assess the potential for the introduction of any new or materially different significant effects, including the potential for ecological and/or arboricultural effects, and if required, suitable mitigation should be secured.

7.3.2.7 Although supporting the principle of the change, ESC does query whether the proposed 30m buffer zone from the Henge to the underground cable and temporary haul route will be sufficient to ensure that no harm will be caused to this heritage asset given that further survey works in the area is still being undertaken. ESC asks that the results of the survey work are reported during the course of examination – and in any case must be reported prior to the end of the examination period - to demonstrate that the proposed 30m buffer zone is indeed sufficient to avoid potential new and unassessed environmental effects. This is particularly important given that the area surrounding the Henge has yet to be investigated and the *'area requiring Preservation in Situ has the potential to be increased'* as SCC stated in its representations to PINS dated 18 August 2025 [AS-074]. ESC expects the findings of the ongoing trial trenching (and other GI works) related to the Neolithic Henge to be complete and available for scrutiny in good time within the examination period so to enable the appropriate provisions and or protections to be secured in the DCO by Requirement, in consultation with the relevant stakeholders and planning authorities.

7.3.3 Heritage Planning Policy

7.3.3.1 The following planning policies have been highlighted for consideration within the adopted East Suffolk Council – Suffolk Coastal Local Plan 2020:

- Policy SCLP11.3: Historic Environment, promotes the conservation and enhancement of the historic environment. The policy requires that all development which has the

potential to impact on historic assets or their settings is supported by a Heritage Impact Assessment and/or an Archaeological Assessment.

- Policy SCLP11.4: Listed Buildings, details a clear set of criteria which must be met if development which affects the setting of listed buildings is to be supported. These include the need to demonstrate a clear understanding of the significance of the building and/or its setting alongside an assessment of the potential impact of the proposal on that significance. It also states that development affecting the setting of a listed building will be supported where it is "of an appropriate design, scale, form, height, massing and position which complement the existing building," and where it uses "high quality materials and methods of construction which complement the character of the building".
- Policy SCLP11.5: Conservation Areas, states that development which has the potential to affect the setting of conservation areas will be assessed against the relevant Conservation Areas Appraisals and Management Plans. It states that development affecting the setting of a Conservation Area should be "of an appropriate design, scale, form, height, massing and position which complement the existing building," and should use "high quality materials and methods of construction which complement the character of the area".
- Additionally, The Saxmundham Conservation Area Appraisal and Saxmundham Neighbourhood Plan Policy SAX10: Historic town centre and Conservation Area are also of relevance for this project's consideration.
- The development is in conflict with Policy SCLP11.4, as it is of a "scale, form height, massing and position" that is incongruent with the setting of Hurts Hall and Hill Farmhouse, thereby causing harm to their significance, which cannot be fully mitigated by new landscape planting. This identified harm is important and should be taken into account in the overall balance.

7.3.4 Design Planning Policy

7.3.4.1 The following planning policies have been highlighted for consideration within the adopted East Suffolk Council – Suffolk Coastal Local Plan 2020:

- Policy SCLP11.1: Design Quality, seeks to encourage high quality design that responds to the local character, setting out criteria proposals should meet. The policy seeks to ensure development is designed appropriately responding to local context in terms of factors including the overall scale and character, layout and making use of high-quality materials.

7.4 Environmental Protection

7.4.1 ESC's Overarching Position

7.4.1.1 ESC looks forward to working with the Applicant with the aim of reaching common ground on the issues that arise. The applicant has produced a significant amount of information in respect to the potential for impact from this project. The issues that ESC had in previous consultations (as set out in the statutory consultation and PEIR response, and restated in this LIR for completeness) remain extant in these application documents.

7.4.1.2 There has been limited engagement from the Applicant prior to submission but the application as now submitted introduces a large amount of information that has not previously been seen. This conflicts with the fundamental ethos of the NSIP consenting process. During this engagement, the

Applicant has relied heavily on the "need" argument for this project and whilst this is accepted as an important factor, it cannot override the need to avoid, prevent, reduce, mitigate and minimise impacts to residents and the environment. ESC wishes to establish a number of ***Overarching Principles*** in order to ensure that these impacts are considered and fully addressed.

7.4.1.3 ***First*** - ESC considers that significant emphasis must be placed on SPR's East Anglia ONE North and TWO projects as precedents for the Sea Link application. It is ESC's opinion that they represent the most comparable projects in terms of construction and operation and in terms of representative locations, impacts and issues. These projects have been recently consented after rigorous examination and provide a good model by which to assess Sea Link against.

7.4.1.4 ***Second*** - ESC considers that a genuine emphasis should be given to likely real-world impacts and their practical reduction. The Applicant has produced a large amount of information in respect to calculated magnitude and significance values. Whilst valuable indicators, they can serve to obscure impacts and how they are felt in a real-world situation. The applicant should concentrate on adopting achievable and practical limits, controls and mitigation with a commitment to Best Practicable Means (BPM) to provide the lowest possible reasonable impacts underlining the principle of providing reassurance to residents in an easy-to-understand way. Any noise limits proposed should be seen as just that, limits to be avoided rather than targets to be achieved and all endeavours to keep noise and vibration to a reasonable minimum are expected to be in line with the principles of BPM.

7.4.1.5 ***Finally*** - the Applicant has identified that a number of significant impacts are likely without mitigation but with the application of non-specific 'mitigation' all of these significant impacts are resolved. ESC will need to see robust evidence for this in all cases, together with the specific details of precisely what mitigation will be available, considered and used, and when delivered, to ensure that not only are significant adverse impacts avoided as required by policy, but that adverse impacts are mitigated and minimised as far as reasonably possible, or preferably avoided entirely. Due to the large number of Nationally Significant Infrastructure Projects in this area, which in context is relatively quiet, rural and residential in nature, expectations are high in terms of these projects being exemplars in local environmental protection regardless of national importance and "need". All proposed works associated with these projects should be planned and the infrastructure designed with the lowest reasonable impact in mind.

7.4.2 Working Hours

7.4.2.1 There are several matters of concern in respect to construction noise and vibration that require further consideration by the Applicant. ESC notes the Sea Link project's proposed core working hours as summarised within Section 3.3 of the Environmental Statement Non-Technical Summary [AS-016] which states that *'the core construction working hours would be…07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays…this excludes start up and close down activities, which can take place for up to one hour either side of the core working hours.'* It is also noted that *'there are operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times.'*

7.4.2.2 Throughout the pre-application consultation stages with the Applicant, 0700-1900 Monday to Friday and 0700-1300 Saturday with no activity Sunday or Bank Holidays were the suggested working hours during construction. This aligns with other projects in the district as discussed below and provides residents with a period of respite from construction activity. However, this was changed prior to submission to include Saturday afternoon, Sundays and Bank Holidays (0700-1900). As a result of engagement with ESC, the Applicant has reduced the hours by a small amount

in the application (0700-1700 on Sundays and Bank Holidays), however they still propose 7 days a week working which ESC oppose. These amended hours of working are not accepted by ESC.

7.4.2.3 Currently consented projects in this district have the following hours of work as requirements:

- SPR E*A1 and EA3 offshore wind farm projects - 0700 – 1900 Monday to Saturday with no activity on Sunday or Bank Holidays.* It is important to note that these projects were consented long before ESC knew how many NSIPs would be choosing this area. These projects also cross a larger area and have the substations in a different district, the location of these substations is in a less noise sensitive area than the proposed site in East Suffolk.
- *SPR EA1N and EA2 offshore wind farm projects – 0700-1900 Monday to Friday, 0700-1300 Saturday with no activity Sunday or Bank Holidays.* Recently consented and rigorously examined through an extended examination that majored on noise impact as a subject of concern, ESC suggests that these are the most comparable precedents to the Sea Link project. The elements are the same in that there is a landfall, onshore cable route, and substation in this district, and indeed they even connect at the same site in Friston. If anything, Sea Link is higher impact due to the second section of cable route from Saxmundham to Friston and the likely co-location of multiple staged projects at Saxmundham. There is also the issue that EA1N and EA2 (including the NG connection substation) at Friston, along with the surrounding activities such as the cable route and road traffic, are constrained by the above hours. For clarity, consistency, reasonability and enforceability, it does not make sense to have a project in the same area to be able to work to a different set of criteria. ESC would therefore suggest that Sea Link follow these projects as a precedent. It is important to note that ESC has received and reviewed a number of noise and vibration management plans for these projects and SPR have committed to more stringent core working hours (as far as reasonably practicable) of 0800-1800 Monday to Friday.
- *SZC nuclear power station - Associated Development Sites 0700-1900 Monday to Saturday but with no noisy work Saturday 1300-1900 and no activity Sunday or Bank Holidays.* Individually these are smaller works and maybe not directly comparable, but they do follow the general precedent of not working Sundays or Bank Holiday Mondays. It is accepted the SZC Main Development Site has 24 hour 7 day working but there are significantly more controls placed upon the standard of noise and vibration management including a lower than category A BS5228 ABC general site noise level and a noise mitigation scheme in place which has allowed this to occur. The development is also an order of magnitude above the others and requires this flexibility to make it viable.

7.4.2.4 During discussion with the Applicant, it was noted that a reason for 7-day a week working was to ensure programme flexibility. It is vital to note that all of these projects have mechanisms to request working outside of permitted hours which is something that ESC will always support where the need has been justified. ESC would suggest a similar mechanism be employed in the case of Sea Link. Justification of working in these circumstances is a vital step in determining BPM, in that it should always be a case that intrusive works can only take place at that time and cannot reasonably be undertaken at a less sensitive time.

7.4.2.5 There will also be a list of exceptions to working hours in the DCO, however currently ESC believes the list for Sea Link is too broad and should be more akin to those examples and precedents set out above. Requirement 23 of the EA1N and EA2 DCOs provides the accepted list of exceptions that has

been previously agreed (Schedule 1, Part 3, Requirements)[15]. Justification for exceptions to working hours should be provided.

7.4.2.6 It is expected that the precedent being used by NGET in the argument to support 7-day working is that of Bramford to Twinstead (B to T) on account of it being the most recently consented DCO in East Suffolk. It should be noted, however, that these working hours were not supported by the Local Planning Authorities, who argued for shorter working hours, only to be overruled by the ExA's recommendation. It is also important to note that the B to T and Sea Link projects are very different, with the impacts of Sea Link spread over a larger area, and the works not being comparable in terms of the actual construction with no substation included in the B to T consent and, importantly, in terms of cumulative impacts with consented and future projects. The latter is particularly important due to the likely co-location of substations on one site at Saxmundham and the convergence of multiple projects to connect at Friston.

7.4.2.7 With the number of NSIPs in this area and the likely additional impact of Sea Link, residents require respite. Sea Link alone will create a number of significant adverse and adverse effects, although it is noted that the Applicant considers that with mitigation, significant adverse effects are not predicted. This conclusion is yet to be tested and there is limited information on mitigation for construction work. It is crucial that residents get regular breaks in what is a very noise sensitive area and that the proposed development is well managed and controlled. Reasonable hours of work represent one of the key areas of reducing impact to residents and should be seen as such.

7.4.2.8 The Applicant suggests that longer working hours will result in the project's construction being completed sooner. Given the construction impacts of other projects the extended duration of works at the co-location site at Saxmundham, and the convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant in any case if all are consented. These are not small or isolated developments that once over will see the end to impact, they are but part of a wider package of works and must be considered as such. Given all other comparable projects provide this respite (including projects promoted by SPR), it would seem obtuse to now start including these periods and creating impact at times where ESC and other projects have worked hard to prevent it, particularly given the spatial relationship between SPR's projects and the proposed Sea Link project.

7.4.3 Noise and Vibration - Introduction

7.4.3.1 The Applicant has provided a variety of assessments and information which will continue to be scrutinised and assessed and will form the basis of ongoing discussions throughout this process. This response should be read in conjunction with ESC's scoping consultation response[16], much of which is still relevant in terms of ESC's expectations.

7.4.3.2 Whilst coordinating projects is welcomed, the cumulative impact of undertaking works and co-locating multiple projects must be carefully considered and assessed in terms of noise and vibration, air quality and dust, light and other environmental protection matters, coordination should seek to reduce overall impacts and prevent magnifying such impacts by their cumulative effects.

7.4.3.3 ESC maintains several concerns, expectations and requirements in relation to this project in regard to noise and vibration generated during construction and operation, which will need to be satisfactorily addressed. Site-specific comments are provided in Section 6 of this LIR, and project-wide comments are provided below.

[15] https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/EA1N-Development-Consent-Order.pdf and https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/EA2-Development-Consent-Order.pdf

[16] https://www.eastsuffolk.gov.uk/assets/Planning/Energy-Projects/Sea-Link/ESC-Response-to-Sea-Link-Scoping-Report.pdf

7.4.4 Noise and Vibration – Sea Link Construction (Methodology)

7.4.4.1 The Applicant has committed to the use of BS5228-1 'ABC' Methodology in respect to the control of construction noise and BS5228-2 in respect to the control of vibration. This is accepted as being in line with other comparable projects and as being an appropriate standard for the purpose. This is within the context of BPM and the expectation that noise and vibration must be controlled to the lowest reasonable minimum in all cases.

7.4.4.2 The Applicant has proposed the SOAEL, which in terms of policy is the Noise limit to be avoided and therefore will effectively be the noise limit for construction activities in line with the categories in Table E.1 of BS5228-1 (the 'ABC' Methodology) and this is accepted as appropriate. However, it is ESC's opinion that the LOAEL has been set too high. The LOAEL is the point where the Applicant is required to "mitigate and minimise" noise and vibration and this should be based on the baseline noise environment of the area. The project should be mitigating and minimising their impacts on any level above that which is currently experienced. The current LOAEL would suggest that there is no/low impact below this level that is not worthy of mitigation, and this is disingenuous.

7.4.4.3 The Applicant places a lot of emphasis on the use of "Temporal Restrictions" as a means to avoid predicted adverse and significant adverse effects. It is unclear from some of the documents what this means however the applicant makes an attempt to clarify this in its response to the ExA's Section 89(3) Letter of 5 September 2025 [AS-106]:

> "*Construction noise - temporal restrictions Potential examples of temporal restrictions that could be applied during weekends for works that may exceed the relevant weekend construction noise level threshold1 at nearby noise sensitive receptors include (but are not limited to):*
>
> - *alternate weekend working (e.g. one weekend on, one weekend off);*
> - *alternate weekend day working (e.g. Saturday or Sunday working, but not both on the same weekend);*
> - *no more than two weekends in any consecutive three weekends; or*
> - *no more than four weekends of working in any consecutive eight weekends.*
>
> *The appropriateness of which temporal restrictions may be considered at specific locations would be subject to further review. The necessity for such measures would depend upon implications for construction programme and contractor working practices."*

7.4.4.4 The BS5228-1 'ABC' methodology sets a clear basis for significance of impact and does not ascribe "temporal restrictions" as a basis for the determination of that significance. This methodology is the agreed methodology for the determination of significance and to introduce such a factor as a basis of significance could falsely dilute impact and obfuscate the need for real mitigation.

7.4.4.5 BS5228-1 (and BS5228-2) provide a comprehensive and tested foundation for the control of noise (and vibration) for construction. They embed the wider principles of Best Practicable Means and their use as the guiding standards has been accepted by all other comparable projects.

7.4.4.6 Whilst there are several standards, guidance documents and indeed some legislation that use temporal thresholds as a way to indicate significance, ESC does not accept temporal restrictions in the form presented as an adequate form of mitigation, especially given the reliance on it to remove predicted significant adverse and adverse effects and consider them in direct conflict with the principles and spirit of the 'ABC' methodology and BS5228-1. Just because noise only happens so many days in so many days does not reduce the impact on the days it is happening, hence reliance on temporal restrictions as primary mitigation in this way is not acceptable.

7.4.4.7 The 'ABC' methodology should be the only assessment of significance for construction noise that is practically used for the project. Notwithstanding the use of other guidance to give wider context at this stage, its use should be supported by the complete adoption of the wider principles of the BS5228-1 standard, by Best Practicable Means and supplemented by S.61 Control of Pollution Act applications where deviation is required to ensure that such deviation is necessary, justified and the smallest it can justifiably reasonably be.

7.4.4.8 Furthermore, the discussion on "temporal restrictions" in [AS-106] does not bring comfort and raises further questions given that not only are there a wide choice of said restrictions suggested as examples but it is also stated that they could be potentially in clear exceedance of the BS5228 table E.1 significance thresholds, something that should only occur by prior consent conferred by S.61 Control of Pollution Act. It goes on to state that mitigation would be dependent on programme and contractor working practices, effectively giving free reign to not provide mitigation for situations in relation to programme or contractor preference, making it a tenuous solution to the problem of preventing adverse and serious adverse effects.

7.4.4.9 As stated above, the 'ABC' methodology should be the only assessment of significance used in practical application to provide relevant thresholds for noise control for the project as that is its purpose. Mitigation should be designed and working methodologies planned around the relevant threshold, whilst giving due consideration to project specific factors as required, and supported by the wider principles of the standard. Adherence to the principles of Best Practicable Means is essential to ensure that noise levels are as low as reasonably possible whilst not breaching the relevant limit. This can be supplemented by s.61 Control of Pollution Act applications where deviation is required to ensure that such deviation is necessary, justified and again the smallest it can justifiably reasonably be.

7.4.4.10 Also for consideration in respect to BS5228, irrespective of ESC's opposition to the proposed working hours currently in the application, it should be noted that there are "weekend" criteria in Table E.1 of BS5228-1 (that is to say, Saturday 1300-1900 and Sunday/Bank Holiday) and that these have lower criteria which should not only be applied but should also be factored in the assessment of impact and any assessment of significance in the Applicant's preference of core working hours.

7.4.4.11 ESC has concerns with the reliance on the guidance document "Design Manual for Roads and Bridges" (DMRB). This has already been questioned but is clearly still being relied upon to try and demonstrate impact. Whilst ESC accepts it may be useful as a supplementary indicator, it does not agree with its use as a fundamental piece of guidance to this project and BS5228 should be the primary standard that controls noise and vibration impact in line with other comparable projects in this area and nationally. The calculated magnitude of impact from DMRB could obscure the real world felt impacts of this project and ESC would prefer to rely on the practical noise and vibration control measures and principles of BS5228 as has been agreed.

7.4.4.12 In terms of vibration, the SOAEL has been set at 1mm/s PPV as the limit to be avoided and therefore practically speaking the construction vibration limit is acceptable and in line with equivalent projects in the area.

7.4.5 Noise and Vibration – Sea Link Operation

7.4.5.1 In terms of Operational Noise and Vibration, it is important to note ESC's fundamental requirements which have been communicated to the Applicant, both verbally and in writing, and appear in their assessment documents. ESC's current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications, but is equally relevant here and has been stated for this and other DCO projects ESC are involved with:

- *'Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified'.*

7.4.5.2 Due to the size of these types of projects the 5dB below background is an aspirational target and one ESC asks developers to consider as the appropriate limit. Deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which will also require robust justification. This should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 and the Noise Policy Statement for England (NPSE) in terms of noise and vibration and particularly the requirement to mitigate and minimise adverse noise impact and avoid significant adverse impact but also that the project should "where possible, contribute to improvements to health and quality of life through the effective management and control of noise".

7.4.5.3 It is essential that the design and location of infrastructure is considered in terms of noise assessment; this must be in terms of Sea Link in isolation and cumulatively at the site with future projects dependent on the information available. Noise impacts must be fully considered in relation to not only the co-located converter station site at Saxmundham, but also in terms of overhead lines and the proposed Friston substation (i.e. switchgear noise emissions – being impulsive in character and operation).

7.4.6 Noise and Vibration – Sea Link Decommissioning

7.4.6.1 The developer must notify the Local Planning Authority prior to any decommissioning activities commencing, and ESC therefore welcomes this being secured under Requirement 13. A full Noise Management Plan which meets BPM should be submitted in writing to the Local Authority for approval prior to commencement.

7.4.7 Best Practicable Means (BPM)

7.4.7.1 The Applicant has committed to Best Practicable Means with respect to work and mitigation for construction works. This is welcomed but mentioned here due to its importance as one of the guiding principles for this project. The expectation is that the Applicant will commit to reducing noise and vibration from construction work to the absolute reasonable minimum by employing Best Practicable Means. This is irrespective of agreed noise and vibration levels which should be seen as the level to avoid not the target to achieve. In terms of precedent, the SPR EA1N and EA2 projects use Control of Pollution Act Section 61 notifications as an ongoing means to demonstrate BPM throughout construction and its use should be considered for this project. This will also provide the opportunity to detail the monitoring that will be in place to verify that impacts are being adequately addressed.

7.4.8 Mitigation

7.4.8.1 Along with the selection and adoption of clear noise and vibration limits for construction, mitigation measures are key for the reduction and prevention of impact. BPM is the standard expected, and this has been committed to, which is welcomed. However, ESC notes that the assessments in Part 2 Suffolk Chapter 9 Noise & Vibration of the ES [AS-109] have identified a number of potential significant impacts, but these significant impacts disappear with mitigation. ESC will need more

detail in respect to mitigation including likely attenuation performance in order to be confident that works can be controlled so as to avoid significant adverse effects and minimise adverse effects.

7.4.8.2 Although Table 9.22 gives examples of mitigation with ranges of likely attenuation, there is some uncertainty in the approach. Ultimately the applicant will be required to comply with appropriate noise and vibration limits, and ESC will need to be confident this is achievable. This is not withstanding the requirement to use BPM to reduce noise and vibration to a reasonable minimum. Table 9.23 attempts to demonstrate predicted noise levels with mitigation, however ESC will require further detail in terms of what mitigation has been applied, what uncertainty there is in the calculations given the wide range of potential attenuation in Table 9.22, and how this represents BPM, in order to be confident that these levels are achievable.

7.4.8.3 There are also multiple mentions of 'temporal restrictions' that nullify a number of significant impacts. ESC acknowledges the examples of temporal restrictions provided in the Covering Letter to the Applicant's response to the ExA's s89(3) letter of 5 September 2025 [AS-106], including alternate weekend working, alternate weekend day working, working no more than two weekends in any consecutive three weekends, and no more than four weekends of working in any consecutive eight weekends. Although ESC acknowledges that the Applicant is proposing a range of mitigation measures in addition to these temporal restrictions, including screening and the use of quieter plant, ESC is concerned that the ES places considerable reliance on temporal restrictions to avoid effects being assessed as significant. Whilst these temporal restrictions are welcomed by ESC, it should be emphasised that the magnitude of noise and vibration effects must be reduced to a reasonable minimum at the times when work is being carried out, rather than relying on mitigation of alternate weekend working or similar to reduce impacts. Given the prominence of these 'temporal restrictions' in the mitigation scheme, ESC considers that further detail is required.

7.4.8.4 Noting that significant effects are ruled out during weekend working due to 'temporal restrictions', notwithstanding ESC's opposition to weekend working (as defined by BS5228-1), any assessment of significance in this period should be based on the weekend criteria of the table E.1 of BS5228-1. ESC will expect a robust and detailed monitoring strategy to be developed to verify the predictions made in this application and to ensure that noise and vibration limits are being complied with.

7.4.9 Outline Construction Noise and Vibration Management Plan – Suffolk [AS-131]

7.4.9.1 ESC has reviewed the Outline Construction Noise and Vibration Management Plan – Suffolk [AS-131], and its comments are provided in Appendix A to this LIR.

7.4.10 Contaminated Land

7.4.10.1 The developer has undertaken a Preliminary Contamination Risk Assessment [APP-116], Generic Quantitative Risk Assessment [APP-120] and Ground Investigation Report [APP-119]. These reports have not indicated any locations where contamination is likely to exist beyond a low risk to human health. Assessments have been carried out in line with the principles of the Environment Agency's Land Contamination Risk Management (LCRM) – this is the applicable guidance in this respect. Whilst the current risk of contamination is low, and ESC accepts the point that much of the route is isolated and agricultural or wild in nature, this does not preclude the possibility of unknown contamination that may be encountered during the development given the amount of excavation required.

7.4.10.2 ESC notes that measure GH08 listed in Appendix A – Outline Code of Construction Practice of the Outline CEMP [APP-341] states that a protocol will be developed for managing any unexpected contaminated land. This plan should contain a robust discovery strategy and procedures for managing contamination. This procedure must include consultation and agreement with the Local Planning Authority in respect of investigation and remediation required in the event this scenario

occurs. For clarity, East Suffolk Council's usual Condition for 'unexpected contamination' is provided below:

> *Unexpected Contamination Condition:*
> *In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.*
>
> *An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons (see Annex 2 of the National Planning Policy Framework) and conform with prevailing guidance (including BS8485:2015+A1:2019, BS 10175:2011+A2:2017 and Land Contamination Risk Management) and a written report of the findings must be produced. The written report is subject to the review and confirmation in writing by the Local Planning Authority that likely risks have been identified and will be investigated accordingly.*
>
> *Where remediation is necessary a detailed Remediation Strategy (RS) must be prepared, and is subject to the review and confirmation in writing by the Local Planning Authority as likely to address the risks identified. The RS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The RS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works.*
>
> *Following completion of the remediation strategy a verification report that demonstrates the effectiveness of the remediation must be submitted to, reviewed by and confirmed in writing by the LPA as likely to have addressed the risks identified.*

7.4.10.3 ESC understands that the former RAF Leiston Airfield is within the scoping boundary. Any ground works on the site, or in close proximity, should test for the presence of PFAS.

7.4.10.4 ESC notes the information provided in the Qualitative Groundwater Risk Assessment and information submitted regarding dewatering activities. ESC would like to take this opportunity to remind stakeholders that the Environment Agency is the lead for such matters.

7.4.10.5 Any Material Management Plans (MMPs) should be submitted to the Local Authority for approval prior to excavations commencing. Records of any soils removed and/or disposed of from the site shall be retained and made available to the Local Authority on request.

7.4.10.6 The UXO precautionary measures stated in the Generic Quantitative Risk Assessment reflect a pragmatic approach and should be adhered to.

7.4.11 Private Water Supplies

7.4.11.1 The district has numerous Private Water Supplies that could be sensitive to some of the construction methods likely to be employed by the project (such as trenchless ducting and dewatering if required). The developer should engage with ESC to ensure that these Private Water Supplies are considered, and where necessary, measures are taken to ensure that the supplies are not affected by works associated with the proposed Sea Link project.

7.4.12 Air Quality

7.4.12.1 With reference to dust, the impact of the project on local air quality through dust emission appears to have been well considered and the documents submitted form the basis for further discussion. Control of dust from construction is proposed through implementation of the full list of mitigation measures from the *IAQM Guidance on the assessment of dust from demolition and construction* document, including the desirable measures. It has been assumed for the purpose of the assessment that all dust generating activities and use of Non-Road Mobile Machinery (NRMM) will be across the full project area which is a worst-case scenario. Monitoring of Nitrogen dioxide and Particulates is proposed at 5 locations, and visual daily checks are to be undertaken to identify any impact of nuisance dust.

7.4.12.2 However, ESC notes that suggested control measure GG12 listed in Table 1.1 of Appendix A – Outline Code of Construction Practice of the Outline CEMP [APP-341] has been weakened. The IAQM guidance requires that 'all vehicles switch off engines when stationary - no idling vehicles', but control measure GG12 has been changed to 'when not in use'. ESC would like to see any idling or stationary engines switched off where this will reduce emissions (considering impact on start-up and length of idling). ESC will also require a commitment to projected weather forecasts to take account of any predicted periods of particularly dry or windy weather so that extra mitigation can be planned and delivered.

7.4.12.3 With reference to emissions, Air Quality modelling of emissions from vehicles associated with the development has been undertaken [APP-133]. Comparison of the input data for the air quality modelling to traffic data within the transport/traffic documents is difficult and requires further justification. Several commitments to vehicle emission standards (Euro standards) and Stage IV/V NRMM have been proposed, and these are welcomed, but will require further justification and discussion. It is important that monitoring of these commitments is agreed with the local authorities, and a reporting mechanism decided. It would seem sensible for this to be combined with the monitoring and reporting requirements listed within the Outline Construction Traffic and Management and Travel Plan – Suffolk [AS-008], through the Traffic Management and Monitoring system.

7.4.12.4 Control measure AQ01 listed in Table 1.1 of Appendix A – Outline Code of Construction Practice of the Outline CEMP [APP-341] commits the applicant to develop and implement an Air Quality Management Plan (AQMP), to be approved by the Local Authority. This gives reassurance that should any matters arise through the process of examination or beyond, these can be incorporated into the control document. There should be a commitment to update this document throughout the lifetime of the project if required, as determined by either the applicant or Local Authority. Consideration should be given to the production of separate AQMPs for each stage of the onshore works.

7.4.12.5 It should be noted that ESC has now revoked the Stratford St Andrew Air Quality Management Area (AQMA). Consideration of the impacts of construction site traffic on this area (and others) is still important and the control measures proposed should still be implemented. The National Planning Policy Framework requires opportunities to improve air quality or mitigate impacts to be identified and taken forward, and NPS EN-1 section 5.2 clearly communicates the importance of energy infrastructure schemes considering measures to mitigate emissions.

7.4.12.6 The developer must notify the Local Authority prior to any decommissioning activities commencing, and ESC welcomes this being secured under Requirement 13 of the draft DCO [AS-087].

7.4.12.7 A full Air/Dust Quality Management Plan should be submitted in writing to the Local Authority for approval prior to commencement, and ESC welcomes this being secured under Requirement 6 of the draft DCO [AS-087].

7.4.12.8 ESC wishes to highlight that the Environmental Protection team has not considered the impact of emissions or dust on the natural environment, nor the impact on sustainability or greenhouse gas/carbon emissions.

7.4.13 Light

7.4.13.1 All lighting will need to be designed and installed with the prevention of nuisance in mind, be this temporary task lighting, semi-permanent compound lighting or permanent operational lighting. Lighting should be kept to a practical minimum to satisfy the task and health and safety requirements. Given that in many cases complaints of light nuisance can be easily and quickly resolved, a clear and robust complaints procedure should be developed to address concerns regarding light nuisance, and this should include rapid investigation and, where appropriate, resolution of the matter.

7.4.14 Complaint Procedure

7.4.14.1 There are various references within the Applicant's submission documents regarding the recording of complaints, and the proposals for public communication appear reasonable. Details of public complaint response times, method of recording, and reporting to the local authority should be considered further.

7.5 Health and Wellbeing

7.5.1 As discussed earlier in the Environmental Protection section of this LIR, Section 3.3 of the Environmental Statement Non-Technical Summary [AS-016] states that *'the core construction working hours would be…07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays… this excludes start up and close down activities, which can take place for up to one hour either side of the core working hours.'* It is also noted that *'there are operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times.'* This is unacceptable. It cannot be stressed overmuch that increases in working hours can have significant adverse effects on people's health and wellbeing. ESC has continually stressed throughout the pre-application engagement with the Applicant that the East Suffolk district is home to multiple consented, planned, and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which will compound the effects on people's health and wellbeing.

7.5.2 It is essential that NGET genuinely engages with the local communities and parish and town councils on these issues – which has not been the case hitherto. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to the impacts created by a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the Sea Link proposals will further exacerbate these existing issues.

7.5.3 Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is as important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are often expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being consulted on, consented, and constructed across the same communities.

7.5.4 Suffolk Mind published a report titled 'Wellbeing in Aldeburgh, Leiston & Saxmundham', exploring the impact of the many NSIPs facing the area on the local population's mental wellbeing using data collected in collaboration with East Suffolk Council[17]. The study found that "57% of residents [in the Aldeburgh, Leiston and Saxmundham area] feel that local energy projects are a barrier to their mental wellbeing to some extent". This is an alarming statistic which evidences the real impact NSIPs, including Sea Link, are having on the mental health of residents of East Suffolk. Four key themes in relation to NSIPs were identified as negatively affecting wellbeing:

- perceived poor communication with NSIP developers;
- the change and loss of habitats and green spaces in the local area;
- feelings of insecurity, including financial insecurity, regarding the impacts of the NSIPs; and
- increased anxiety and stress, including due to concerns about their housing situation and impacts on the local environment.

7.6 Public Rights of Way

7.6.1 The Outline Public Rights of Way (PRoW) Management Plan – Suffolk [APP-352] also sets out additional PRoW that will be affected by associated infrastructure works. Public enjoyment and amenity value are key considerations for PRoW. It is important that the quality of the user experience is not diminished and instead PRoW are protected and enhanced (where practicable). Key routes should be identified and considerations given to prevent loss of amenity value and to prevent disruption to sustainable transport options surrounding popular travel destinations, employment and education. The health and wellbeing of local communities is also an important consideration. Popular local routes should be considered just as important as promoted routes.

7.6.2 Where permanent or temporary diversions are required, consideration must be given to the relevant user groups (defined by the status), recorded widths, vulnerable users, user enjoyment and surface condition. Diversions should not be considered in isolation to prevent network fragmentation and loss of enjoyment/amenity value. The overriding objective should be to prevent disruption. Temporary closures should be considered as a last resort if no other options to ensure public safety are possible. Options should be explored with SCC and ESC in the first instance.

7.7 Community Benefits and Compensation

7.7.1 The benefits of security of electricity supply are felt nationally, but the impacts of hosting such large infrastructure are felt by communities closest to it. These impacts are felt during the lifetimes of these projects, from construction, operation, to decommissioning. It should be noted that these impacts are created in a context where no significant economic benefit in the immediate area once the construction phase is over is provided.

7.7.2 It was noted that at the webinars held early in the pre-application stage that there were questions from the public about potential financial and community benefits for local communities affected by the construction of the project. If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. ESC would welcome further engagement with the Applicant on this matter.

7.7.3 It is important that community benefits remain distinctly separate from the need to adhere to the mitigation hierarchy, first to avoid, then to mitigate, and only if mitigation is not adequate, to compensate. As part of this process, it is important that long-term enhancement and legacy opportunities are maximised.

[17] https://www.suffolkmind.org.uk/wp-content/uploads/2025/08/Aldeburgh-Leiston-and-Saxmundham-Wellbeing-Report.pdf

7.7.4 Where residual harm is identified across the onshore order limits following the application of the mitigation hierarchy, ESC expects NGET first to look to mitigate the effects, and then where appropriate to look at compensation for residual impacts. ESC requires further discussion with the Applicant as to how to compensate the residual impacts.

7.7.5 ESC understands that some communities may have their own ideas on how to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that Sea Link is not being developed in isolation - there are multiple other projects proposing compensatory measures so there is potential for NGET to co-ordinate compensation associated with Sea Link with other measures agreed with other project promoters. In this context, ESC draws the ExA's attention to the details contained within the Section 111 agreements with ESC for the SPR East Anglia ONE North and TWO offshore wind farms[18].

7.8 Socioeconomics, Leisure and Tourism

7.8.1 Overview

7.8.1.1 In September 2022, ESC responded to the Sea Link non-statutory consultation expressing concern that Sea Link has the potential to cause negative socioeconomic impacts locally, especially during the construction phase, but also during the operation, maintenance, and decommissioning phases of the Suffolk Onshore Scheme.

7.8.1.2 This potential for negative impacts, whether permanent or temporary, affecting the local economy were also echoed within ESC's response to the 2023 statutory consultation.

7.8.1.3 The Suffolk Onshore Scheme proposal introduces a multi-year construction programme, extensive underground cable installation, permanent converter station and substation infrastructure, and a cumulative impact context in which East Suffolk is already absorbing significant disruption from other NSIPs, notably Sizewell C.

7.8.1.4 Of primary concern are the potential cumulative impacts resulting from the effects of intra-project and inter-project activities, and the requirement to limit impacts through mitigation strategies that include the effective coordination and co-location of infrastructure with other NSIP developments locally.

7.8.1.5 ESC remains deeply concerned about the potentially negative socioeconomic effects that the Suffolk Onshore Scheme will have on key economic sectors including agriculture and the visitor economy.

7.8.1.6 Tourism is a cornerstone of East Suffolk's economy and identity. The area's coastal setting, cultural offer, natural beauty, and rural tranquillity attract millions of visitors each year. Tourism not only sustains thousands of jobs and small businesses but also underpins the wider sense of place that is vital to resident wellbeing and economic resilience.

7.8.1.7 ESC needs to be reassured that the monitoring, mitigation, and compensation strategies are sufficient to minimise any negative socioeconomic impacts caused by the Suffolk Onshore Scheme.

7.8.2 Policy Context

7.8.2.1 ESC policies and strategies recognise the national importance of offshore wind and nuclear power to meet anticipated demand for clean electricity and for sustained economic growth. However, national need must be balanced with the needs of residents and businesses in East Suffolk.

[18] https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/EA1N-Section-111-Agreement.pdf and https://www.eastsuffolk.gov.uk/assets/Planning/Offshore-Windfarms/EA2-Section-111-Agreement.pdf

7.8.2.2 The *Suffolk Coastal Local Plan 2020*[19] envisions a diverse, strong, and prosperous economy which supports key sectors and will provide increased local earnings and job opportunities helping people to live and work within their communities. Tourism is recognised as a strategic priority and ESC seeks to protect and enhance the tourism and cultural facilities across the Local Plan area.

7.8.2.3 The *ESC Strategic Plan 'Our Direction 2028*[20] prioritises a thriving economy that will enable residents to benefit from, and contribute to, a thriving economy. To support this ambition, ESC will seek to ensure that residents can benefit from national infrastructure projects and is committed to supporting responsible tourism and the visitor economy.

7.8.2.4 The *East Suffolk Visitor Economy Strategy 2022-2027*[21] recognises seven priority sectors for economic growth in East Suffolk, two of which are especially susceptible to potentially negative impacts resulting from the Suffolk Onshore Scheme: Agriculture including food and drink, and the visitor economy which includes the cultural sector.

7.8.3 Baseline Conditions and Assessment

7.8.3.1 ESC is deeply concerned that the assessment of baseline conditions fails to account for an increasingly dynamic economic environment in East Suffolk.

7.8.3.2 Whilst the Applicant's assessment [APP-057] is considered to meet existing requirements and guidance, ESC considers that the assessment needs to go further. A baseline is simply that, a reference point or snapshot of conditions at a single point in time, and without ongoing monitoring and evaluation, changes in baseline conditions cannot be assessed and the effects on socioeconomic, leisure and tourism receptors cannot be determined.

7.8.3.3 East Suffolk is unusual, and perhaps unique, in the number and scale of energy NSIPs and other major developments either being constructed or planned for construction over the next decade. Many of these have been shortlisted and described within Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].

7.8.3.4 The impacts resulting from these developments means that it is difficult to predict future baseline conditions out to 2031 with any degree of accuracy. Equally, it is difficult to disaggregate certain impacts of the proposed Sea Link project from other significant infrastructure projects locally.

7.8.3.5 ESC considers it essential to understand the changing baseline conditions during the construction period of the Suffolk Onshore Scheme, especially the direct and indirect impacts, positive and negative, affecting employment and labour supply, supply chain activity, local accommodation facilities, impacts on PRoW and recreational routes, key sectors such as tourism, and individual receptors including businesses and local visitor and high street destinations.

7.8.3.6 The Applicant recognises and describes within [APP-057] the inherent limitations of their methodology, the lack of statutory guidance for undertaking assessments of this type, the subjectivity of professional judgement, and the limitations of available datasets.

7.8.3.7 ESC is firmly of the view that the desk-based methodology is insufficient for the conditions described, and requires the applicant to work with ESC and commit to the following:

[19] https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf

[20] https://www.eastsuffolk.gov.uk/assets/Your-Council/Our-Performance/Performance-Reports/Strategic-Action-Plan-Our-Direction-2028.pdf

[21] https://www.eastsuffolk.gov.uk/assets/Business/East-Suffolk-Visitor-Economy-Strategy.pdf

1. To review and update their assessment of baseline conditions immediately prior to commencement of construction of the Suffolk Onshore Scheme, thereby ensuring that baseline conditions are current.
2. To discuss and agree the scope and frequency of ongoing monitoring and reporting of socioeconomic conditions during the construction phase of the project.

7.8.4 Cumulative Impacts

7.8.4.1 East Suffolk is already experiencing reported impacts resulting from NSIP development locally, especially workforce effects on the availability and affordability of private housing and visitor accommodation, the displacement of workers from businesses locally, and disruption to the local road network.

7.8.4.2 A comprehensive assessment and study of the cumulative impact of multiple developments in East Suffolk is critical if ESC is to understand the resultant socioeconomic pressures, identify appropriate mitigation or support programmes, and be able to develop policies and programmes that alleviate the issues identified.

7.8.4.3 Commencement of works on the Sizewell C new nuclear power station began in January 2024 and construction is expected to peak towards the end of this decade, at which point the project will be employing approximately 7,900 workers. Construction of the Suffolk Onshore Scheme is anticipated from 2026 through to 2031, with peak construction in 2029 when a peak workforce of 327 FTE is expected.

7.8.4.4 In Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] and Appendix 2.13.A to this chapter [APP-141], the Applicant shortlists 28 developments for the inter-project cumulative effects assessment. Of these, only six developments were identified as having potentially cumulative effects upon shared socio-economic, recreation and tourism receptors.

7.8.4.5 Ultimately, the published conclusion is that no significant cumulative effects on socioeconomics, recreation and tourism are expected because of the Suffolk Onshore Scheme. ESC finds the Applicant's conclusions surprising, dismissive and entirely unacceptable. It is simply not credible to assert that the Suffolk Onshore Scheme, when considered in combination with other developments, including Sizewell C, perhaps the largest civil construction project in the UK, will not result in any significant inter-project cumulative effects on socio-economic, recreation and tourism receptors, whether positive or negative.

7.8.4.6 Rationally, ESC recognises that the Suffolk Onshore Scheme is much smaller in scale than Sizewell C. However, the Onshore Scheme Boundary lies within 8km of several Sizewell C development sites and is likely to affect shared socioeconomic receptors.

7.8.4.7 ESC notes that when establishing the 'zone of influence', or study area, the Applicant has indicated that professional judgement was necessary in assessing economic impacts within a 60-minute travel area from the Suffolk Onshore Scheme Boundary, and that combined effects on individual businesses and attractions were only measured out to 500m from the Suffolk Onshore Boundary. Measuring combined effects within 500m of the boundary will not reflect the true extent of the socioeconomic influence, especially in rural areas where businesses and accommodation providers often service wider catchment areas.

7.8.4.8 There is no doubt that there is a spatial and temporal overlap between the two projects and ESC believes that the limitations inherent within the area of study, combined with the subjective nature of professional judgement, have underestimated the potential for cumulative effects within the assessment.

7.8.4.9 As a consequence, ESC requests that the Applicant commits to ongoing monitoring and reporting on the condition of socioeconomic receptors throughout the construction period. This would enable meaningful comparison against an up-to-date baseline and support proactive planning for worst case scenarios, particularly those arising from the overlapping peak construction phases of the Suffolk Onshore Scheme, Sizewell C, and other major developments that may collectively impact local socioeconomic, recreational, and tourism assets.

7.8.5 Construction Phase: Economic Impact

7.8.5.1 Employment - The Applicant proposes a construction phase that is expected to start in 2026 and to be functionally complete by the end of 2032.

7.8.5.2 This period is likely to overlap with the construction phase of the Sizewell C nuclear power station, also located in East Suffolk, and the combination of effects is considered to have significant implications for:

1. Workforce demand and the potential for labour market displacement.
2. Additional pressure on local accommodation.
3. Resident and visitor perception of disruption.

7.8.5.3 During construction of the Suffolk Onshore Scheme, an estimated peak workforce of 327 FTE staff is expected in 2028 and an estimated average of 86 gross direct FTE expected on site during the construction period. 26 FTE jobs per annum for residents are expected during the construction period.

7.8.5.4 ESC welcomes the opportunity that Sea Link presents in generating direct and indirect employment, training, and apprenticeship opportunities, both on site and in the supply chain. However, ESC would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment, such as displacement, continue to be suitably assessed and mitigated.

7.8.5.5 The Applicant is proposing construction activity on Sundays and bank holidays. This remains a serious concern. These are peak trading days for the visitor economy and are essential for sustaining the viability of many small businesses.

7.8.5.6 ESC urges a firm commitment to avoid core tourism periods and prioritise coordination with local events calendars.

7.8.5.7 ESC notes the opportunities to improve awareness of the wider energy sector across East Suffolk and the high value/high skill employment and apprenticeship opportunities available. The decision maker needs to be able to balance the potential benefits which may result from the temporary employment, training and apprenticeship opportunities created against the disbenefits of the project.

7.8.6 Accommodation

7.8.6.1 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] suggests that in a 'worst case scenario' where the peak construction workforce for the Suffolk Onshore Scheme and the construction of other developments, including Sizewell C, coincide, there would be negligible impact on the hotel, bed and breakfast, and inns accommodation sector.

7.8.6.2 However, ESC is concerned that these conclusions are premature and that the impacts cannot be adequately assessed until such time that the timings of peak construction for Sizewell C and the Suffolk Onshore Scheme are confirmed.

7.8.6.3 Sizewell C is expected to have a peak construction workforce of 7,900 workers, of which an estimated 2,900 of the non-home-based workers are expected to live off site. This requirement when combined with an estimated workforce accommodation requirement for the Suffolk Onshore Scheme of 86

workers, although relatively small, could adversely affect an overstretched private sector rental and visitor accommodation sector.

7.8.6.4 The utilisation of a 60-minute Drive Time Catchment Area, whilst sensible, fails to factor in the potential consequences of human behaviour where workers gravitate towards accommodation that is closer to their place of work in the first instance, and then radiate outwards and towards the limits of the assessed Catchment Area.

7.8.6.5 In this scenario, private sector rental and visitor accommodation within east Suffolk would be utilised by workers first, potentially distorting the market, displacing residents, and reducing the availability of accommodation for visitors.

7.8.6.6 The influx of workers, not just from those directly employed by developers but also indirectly through supply chains is unprecedented and estimates of numbers is an imprecise science.

7.8.6.7 ESC is sufficiently concerned that the Suffolk Onshore Scheme could adversely tip the balance of accommodation availability, even if the worst-case scenario of peak construction for SZC and Sea Link coinciding does not materialise, that internal working groups are independently assessing the existing accommodation stock and testing availability under various scenarios. This work is ongoing, and the outcomes are yet to be published.

7.8.6.8 ESC would welcome the Applicant's ongoing monitoring and publication of workforce projections throughout the construction period.

7.8.7 Tourism

7.8.7.1 Tourism is a significant contributor to East Suffolk's economy and identity and comprises around 1,300 businesses and employs more than 11,000 people, or 12% of the total district workforce.

7.8.7.2 The area's coastal setting, cultural offer, natural beauty, and rural tranquillity attract millions of visitors each year and further sustain thousands of jobs and businesses both directly and indirectly across the district.

7.8.7.3 ESC strongly disagrees with the conclusions drawn in Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057] and Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] that there will be no significant effects, cumulative or otherwise, caused by the Suffolk Onshore Scheme on socioeconomic, leisure and tourism receptors within the Study Area.

7.8.7.4 The visitor economy is a complex system of interdependent factors which includes the natural environment, high quality destinations such as historic towns and villages, local attractions, restaurants, cafes, and accommodation providers. Together, these factors attract visitors and provide an exceptional visitor experience.

7.8.7.5 ESC considers that the assessment methodology used is insufficient and fails to account for the complexities and interdependency of socioeconomic receptors in a successful visitor economy. For example, limiting the Study Area to 500m from the Onshore Scheme Boundary does not adequately assess the impacts of construction on a bed and breakfast receptor located beyond the Study Area, despite its dependence on its guests having unhindered access to local destinations such as Thorpeness and Aldeburgh, and to then visit an attraction such as The Scallop at Aldeburgh Beach.

7.8.7.6 Chiefly, the combination of impacts resulting from the Suffolk Onshore Scheme and other developments in East Suffolk are considered to have significant effects on visitor perception and experience.

7.8.7.7 Induced negative perceptions of the Suffolk Coast will deter visitors to East Suffolk, and for visitors there is a risk that their experience will also be impaired with a consequent reduction in repeat tourism, long-term reputational damage, and economic decline.

7.8.7.8 Concerning tourism, ESC remains especially concerned about the:

1. Impact on the availability and pricing of private residential and visitor accommodation.
2. Impact of extended project working hours on the intrinsic tranquillity of the visitor experience.
3. Impact of construction traffic restricting access to visitor destinations of all types.
4. Impact on Public Rights of Way affecting the visitor connection and experience of the natural environment.
5. Impacts on the visual and amenity value of the landscape.

7.8.7.9 ESC asks the Applicant to re-consider its assessment and the conclusions drawn. ESC believes this could be achieved by a considered holistic approach that systematically evaluates the broader aspects of the visitor economy. One that extends beyond desk-based assessments, using mixed methodologies such as surveys, interviews, and additional tourism data to understand the key strengths and vulnerabilities of the visitor economy.

7.8.7.10 ESC is sufficiently concerned about the possible inter-project cumulative effects of development locally that it is commissioning data driven tools to assess the following:

1. Visitor Perception
2. Visitor Experience
3. Accommodation Studies
4. Retail Spend Data

7.8.7.11 This is in addition to existing platforms for monitoring footfall in town centres and car parking across the district.

7.8.7.12 Tourism is one of the largest business sectors in East Suffolk, generating approximately £700 million per year and supporting over 11,000 FTE jobs and accounting for 15% of all local employment.

7.8.7.13 ESC is determined to ensure that the visitor economy continues to evolve positively and sustainably, offering a high-quality experience for visitors and providing well-paid, skilled jobs for residents, encouraging new businesses and new investment to the sector, building resilience and innovation into small businesses, and developing pride and a better quality of life for East Suffolk residents.

7.8.7.14 ESC is committed to growing the visitor economy in a sustainable and high-quality way. The focus is on:

1. Enhancing visitor experiences
2. Creating well-paid, skilled jobs for residents
3. Attracting new businesses and investment
4. Supporting small business resilience and innovation
5. Fostering local pride and improving residents' quality of life

7.8.7.15 However, the continued success of the sector is dependent on its ongoing reputation as an excellent holiday destination and the overall experience offered to visitors.

7.8.7.16 The visitor experience is built around five key strengths:

1. A unique coastline and beaches
2. Historic towns and villages
3. Protected natural landscapes.
4. A vibrant cultural and events calendar
5. Rich heritage assets and tranquil settings

7.8.7.17 These qualities underpin both the economic value and emotional identity of East Suffolk. Any development that detracts from tranquillity, accessibility, or reputation risks damaging not just business turnover, but visitor loyalty, perception, and long-term demand.

7.8.7.18 The visitor economy is the sum of its component parts. Each connected and interdependent on each other. Visitors move from destination to destination, employees need access to their place of employment, and businesses need uninterrupted supply chains that can meet demand.

7.8.7.19 Should this project proceed, it is essential that the potential for negative impacts is appropriately considered, and sufficient mitigation is provided to support the continued success of the visitor economy.

7.8.8 Local Business Disruption and Infrastructure Proximity

7.8.8.1 The Suffolk Onshore Scheme is likely to affect numerous sensitive business premises located within 500m of the order limits. These include:

1. Visitor attractions
2. Small accommodation providers (B&Bs, inns)
3. Hospitality venues
4. Retail outlets, including units within Saxmundham's core shopping area.

7.8.8.2 These assets are critical to the viability and vibrancy of town centres and rural visitor destinations. The Suffolk Onshore Scheme infrastructure and associated access works, both permanent and temporary, are substantial in scale, and their proximity to businesses presents real risk of:

1. Reduced footfall and turnover
2. Visual intrusion and reputational harm
3. Decreased property and asset value.
4. Temporary or permanent operational disruption

7.8.8.3 The potential for long-term impacts on Saxmundham's high street economy is especially concerning, given the town's role as a local service centre and its alignment with ESC's ambitions for economic growth.

7.8.8.4 Saxmundham is a traditional rural market town with limited industrial development outside of an existing industrial estate located just north of the town. The proposed converter station is unprecedented in scale and visual impact and has the potential to transform the character of the town.

7.8.8.5 It is believed that the Converter Station, positioned in an elevated position, will be the highest building in the locality, eclipsed only by Sizewell B nuclear power station, visible as a local landmark for miles around, and a symbol of encroaching development in a traditionally rural setting.

7.8.8.6 Several retailers, including Waitrose, Tesco and Costa are located within 500m of the Suffolk Onshore Scheme Order Limits, and these, in turn, are adjacent to the main shopping thoroughfare.

7.8.8.7 High Street economies are fragile, and Saxmundham is dependent on local trade as well as an influx of visitors exploring the Suffolk Coast. Whilst Saxmundham may benefit from a temporary influx of workers during NSIP construction, there are concerns that the legacy for Saxmundham could be one of boom and bust and where the character of the town, its attraction, is permanently changed.

7.8.8.8 ESC needs to be reassured that sufficient effort will be made to mitigate the visual impacts of the Converter Station on Saxmundham, and that economic health of the town will be monitored

7.8.8.9 ESC remains committed to ensuring that the Suffolk Onshore Scheme suitably mitigates the potential impacts and provides suitable compensation where appropriate.

7.8.9 Socioeconomic Summary

7.8.9.1 ESC is deeply concerned about the potential for adverse socioeconomic impacts caused by the Suffolk Onshore Scheme, especially the potential for inter-project cumulative effects in combination with other NSIPs and developments locally.

7.8.9.2 Of particular concern is the effect on the visitor economy which encompasses a broad swathe of interdependent destinations, local attractions, and businesses such as restaurants, cafes, and accommodation providers.

7.8.9.3 ESC needs to be reassured that the applicant recognises that the East Suffolk economy is increasingly dynamic, caused in part by NSIP development, but also by other thriving sectors such as food and drink.

7.8.9.4 Baselines change and the effects of NSIP development need ongoing monitoring to facilitate the development of appropriate strategies and plans to mitigate both identified and unexpected eventualities.

7.8.9.5 Monitoring can include:

1. A Tourism specific Economic Impact Assessment.
2. Ongoing mixed methodology assessments that include quantitative and qualitative research that helps understand visitor perception and experience, including the surveying of individual economic receptors that could include monitoring of accommodation capacity and occupancy, for example.

7.8.9.6 ESC is also mindful of the potential for beneficial socio-economic impacts and encourages the Applicant to support initiatives that support economic growth locally.

7.8.9.7 Initiatives could include:

1. An Employment and Skills Plan that supports outreach to schools, apprenticeships and local employment either directly or indirectly on the Suffolk Onshore Scheme.
2. A Supply Chain Plan that helps local businesses identify opportunities for gaining contracts within the supply chain during the construction, operation, and decommissioning phases of the Suffolk Onshore Scheme.

7.9 Cumulative Impacts

7.9.1 This area is environmentally sensitive and has a number of already consented DCOs coming forward. Sea Link is particularly important due to the co-location of projects all within the National Grid Group, meaning it can consider opportunities for impact reduction that are maybe more difficult with other projects. This is particularly important with regards to issues such as background

sound level creep from operational noise at Saxmundham. That said, cumulative impact across the board must be comprehensively considered to reduce overall impact to the residents of this district.

8. Draft Development Consent Order

8.1 ESC has reviewed the Applicant's submitted draft DCO [AS-087], having regard to the LPA's responsibilities for enforcing and discharging the requirements for the Sea Link project, should it be granted consent by the Secretary of State.

8.2 Detailed comments on the draft DCO will be provided in due course and ESC will participate in the relevant Issue Specific Hearing.

Appendix A: ESC Comments on Sea Link Outline Construction Noise and Vibration Management Plan (Outline CNVMP) – Suffolk [AS-131]

The following comments on the Outline Construction Noise and Vibration Management Plan - Suffolk [AS-131] are provided by ESC's Environmental Protection Team as an Appendix to the LIR, with the caveat that further comments may emerge over the course of examination.

Paragraph 2.5.1 – Construction working hours are not accepted. The full justification for this position has been stated in detail in previous responses and is also provided in Section 7.4.2 of ESC's LIR. For reasons of providing respite to residents, the "Weekday" hours of BS5228-1 'ABC' Methodology are deemed to be appropriate core working hours. This has been accepted by all other comparable projects in the district and will be the standard required by any others to follow. ESC will, however, reiterate that it accepts that there will be times that the project requires flexibility and needs to work outside consented hours and, as with other consented DCOs, ESC will accept a process whereby the project can request the ability to do so with justification of necessity for approval by ESC. This process works very well with other projects and there is no reason to believe it cannot do so here.

Paragraph 2.5.3 – The list of reasons that outside consented hours work appears generally reasonable, with the exception of those delayed by weather – this should be a situation that uses a request to work outside consented hours process in order to show that it cannot be achieved another way within consented hours.

Paragraphs 2.5.4 and 2.5.5 – Time limitations for percussive piling and deliveries make no mention of Sundays. The CNVMP will need to reference whether these activities are included or excluded on Sundays. For reference, ESC's preference in line with its broader requirement for working hours is that they are excluded.

Section 2.5 – As a general comment and regardless of the specific examples above, it is suggested that the Applicant include a mechanism to request and agree outside consented hours works to provide flexibility. This is particularly important given ESC's position on core working hours but would allow for the possibility of these activities taking place outside of the circumstances given in the CNVMP.

Paragraph 4.1.2 – This makes provision for contractor-led noise and vibration assessments and updates to the CNVMP but does not make reference to the role of ESC. These assessments and updates should be provided to ESC for information and agreement.

Section 4.2 – The commitment to the general control measures of BS 5228-1, BS 5228-2, and Best Practicable Means (BPM) is welcomed. However, it should be made clear in this section that the stated examples of BPM are not exhaustive, and all reasonable measures will be considered. ESC suggests that a more comprehensive table of possible BPM should be added to ensure that all parties can see the scope of BPM, but it would also request that provision for a BPM review process be made so that in the event of a complaint or upon a reasonable request from ESC, this may be reviewed to ensure that BPM is being implemented for a piece of work and to identify opportunities for further mitigation or better methodology in response.

Section 4.3 – This section refers to “Specific Mitigation Measures”, but the examples listed not only reflect Section 4.2 of the Outline CNVMP but are in fact just examples of BPM. For example, if screening can be reasonably used then that is BPM, if quieter plant is available and it can reasonably be used then that is BPM, and if better alternative construction methods are available and can reasonably be used then that is also BPM. This does not appear to reflect specific mitigation measures but what is the general expectation for projects of this nature and the CNVMP should reflect that.

Table 4.1 – This table refers to “temporal restrictions”. As discussed in Section 7.4.8 – Mitigation of ESC’s LIR, ESC notes that these ‘temporal restrictions’ have been relied on heavily in other documents to reduce adverse impact, and considers further detail is required. If this means avoiding triggering the number of days of noise in a number of calendar days, then this is a guidance/standard compliance measure and whilst is accepted that these standards and guidance are designed to categorise impact, simply reducing the number of days of that impact in a period of time does not in itself reflect real world mitigation. ESC accepts that it is a vital part of defining the impact on Noise Sensitive Receptors (NSRs), but this should not be at the expense of practical noise reduction measures which should form the primary mitigation for noise and vibration.

Paragraph 4.3.7 – As with noise, further vibration assessments should be shared with ESC. Although damage caused by vibration is not specifically within ESC’s remit, ESC suggests to the Applicant that where significant vibration levels are predicted, pre-commencement property condition surveys should be carried out for the benefit of all parties to ensure that allegations of damage have a baseline and it is clear whether or not the project is or is not responsible.

Table 4.2 – This lists several reasonable and sensible mitigation measures for vibration. Consideration should be given to calculation of standoff distances for the startup of vibratory rollers which are often one of the most significant contributors to vibration issues. Impact is usually more significant at startup as opposed to ‘steady state’ running of vibratory rollers, and consideration of this can form useful mitigation.

Section 4.4 – Section 61 Control of Pollution Act (CoPA) is accepted as a suitable means to provide ongoing regulatory oversight and input into construction and is used as such on EA1N and EA2 with success. That said, although one of the reasons for using S.61 in this instance is to work outside core hours, it may still be useful to have a separate process for outside consented hours working as with the other projects. In reality, one of the conditions of a S.61 for a DCO consented project will be that full compliance with the CNVMP is required – this closes the circle between the DCO and S.61 and intrinsically links the two. If outside consented hours works are required but, in a timescale, quicker than the 28 days allowed for a S.61, or the need becomes apparent after the grant of a S.61, a separate process under the CNVMP can be used more expediently than a S.61 application whilst also working with S.61 if appropriate.

Paragraph 4.6.1 – As routine noise and vibration monitoring is not proposed, it is vital that it forms part of any S.61 applications. There should be a mechanism for ESC to reasonably request monitoring in the event that compliance with the levels of the BS 5228-1 ABC methodology needs to be established outside of the S.61 process, or in the event that complaints are received.

Paragraph 4.6.9 – The threshold for general vibration or 1 mm/s PPV is accepted as appropriate, being the level where complaints are likely.

Paragraph 4.6.11 – ESC is concerned with the adoption of 12.5 mm/s PPV as an upper threshold in respect to building. Whilst this is acceptable with respect to being below the 15-50 mm/s PPV (dependent on frequency) thresholds where cosmetic damage may be possible in domestic structures, it is above the level of tolerability. The adoption of the 1 mm/s PPV in Paragraph 4.6.9 should be the primary threshold of compliance.

Section 5.6 – This section should include a review process that can be requested by ESC, acting reasonably, to ensure that the CNVMP and its contents may be reviewed and amended by agreement as a result of a significant complaint or new information in respect to the works and areas in which it is taking place.